

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 regimes. Our concerns arise from a detailed review of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects.

The location of the proposed development off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and rich cultural heritage, raises fundamental questions about the compatibility of this large-scale project with established statutory requirements and principles of sustainable development. The proximity of the proposed large turbines to the shoreline amplifies worries regarding landscape capacity and visual impact, which are critical in this near-pristine environment.

Inadequate evidence supporting the application is a core issue. Missing critical environmental data, inconsistent baseline information, and undefined aspects of the proposal hinder a comprehensive understanding of its potential effects. The flexible design framework complicates the assessment of significant impacts, while unspecified mitigation measures leave their effectiveness unquantifiable. Consequently, the documentation does not provide a complete understanding of the environmental, cultural, or community consequences, undermining claims of negligible effects that lack substantial evidence.

Moreover, the application reveals notable conflicts with existing policies. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, cultural heritage, and health and wellbeing. The failure to demonstrate compliance with national requirements for biodiversity protection and environmental integrity raises serious concerns.

Overall, the unprecedented scale of this proposal, coupled with insufficient information and evident policy non-compliance, indicates that the application is incomplete and unable to support a lawful determination. In light of these issues, it is imperative that the precautionary principle be observed.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a comprehensive, clear, or dependable account of the anticipated environmental effects

of the proposal. The application employs a flexible Project Design Envelope that lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders a consistent application of a worst-case scenario. Consequently, the integrity of the assessment is compromised, making it impossible for the public and the competent authority to grasp the true extent of environmental impacts.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent under the premise that environmental harm will be addressed later hampers any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of essential information to post-consent stages is procedurally unsound and contradicts the intent of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation measures are clearly established prior to decision-making.

There are also significant gaps in the evidence provided, including shortcomings in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. These deficiencies result in uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not satisfy the evidential threshold mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, as it does not establish that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the deficiencies in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is fundamentally inadequate and fails to satisfy the statutory requirements of the Environmental Impact Assessment regime. The application does not provide a structured and reasoned comparison of realistic alternatives based on environmental effects; instead, it offers a narrative of project evolution. This method does not demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Furthermore, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining impact mean that the absence of such an analysis precludes any conclusion that the proposed siting is the least damaging option.

These shortcomings also extend to cable routing and landfall assessment, with insufficient evidence that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that mitigation by design has not been implemented, relying instead on post-design measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a neglect of the established mitigation hierarchy, which prevents the competent authority from determining whether less harmful and more suitable alternatives are available. Without a thorough 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, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species related to the West Lewis coastal environment is insufficient, lacking a complete understanding of the ecological receptors in this biologically active marine system. The baseline data presented is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to offer a reliable evidential basis for evaluating potential impacts.

A notable shortfall in the assessment is its treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise or assess otters' active use of coastal areas for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the assessment overlooks the potential impacts of construction-related disturbance, noise, and increased activity, thereby undermining the conclusions drawn about the absence of significant effects on this species.

Additionally, there are significant deficiencies in the assessment of basking sharks. The

reliance on aerial surveys leads to considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate a frequent presence in these waters. The failure to properly incorporate such critical data results in an incomplete baseline, which in turn diminishes the reliability of the conclusions reached.

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

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime or the requirements set out in National Planning Framework 4, as the proper identification and assessment of protected species are lacking. The uncertainty generated by these deficiencies prevents any conclusion about adverse effects being made beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In light of these issues, it is clear that consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment related to the proposed development is profoundly inadequate, exhibiting numerous internal inconsistencies and significant evidence gaps that undermine its findings. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to convincingly demonstrate that these species will not suffer adverse effects. This development is situated in key foraging areas and migratory paths, yet the assessment does not thoroughly explore the implications of displacement, collision risk, or habitat loss.

A striking contradiction arises within the application itself, where the developer claims that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. Such inconsistencies cast doubt on the reliability of the assessment, suggesting that the conclusions drawn are not supported by adequate evidence. Furthermore, the assessment lacks sufficient proof that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The critical importance of these feeding grounds has not been fully recognised, and the reliance on

modelling techniques introduces further uncertainty, particularly concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially when baseline data is incomplete and the behavioural responses of the species are not well understood.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is seriously lacking. It does not acknowledge the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are closely interconnected. Instead, the application simplifies heritage, viewing it as a collection of isolated, unchanging assets. This perspective ignores the ongoing social, cultural, and spiritual functions these elements have within the community.

A significant shortcoming is the handling of culturally significant sites like the cemeteries at Dalmore, Bragar, and Barvas. These places are active sites of burial and spiritual practice; however, the assessment wrongly categorises them as static features. It fails to take into account their continued use and the impact of development on their surroundings. Such mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance to community life.

Moreover, intangible cultural heritage is overlooked. Elements such as the Gaelic language, local traditions, and the enduring relationship between the community and

the coastal environment are vital to the area's identity yet are entirely absent from the assessment. This gap means the cultural impact of the proposed development cannot be fully understood.

Community rights and engagement also raise concerns. The Gaelic-speaking population embodies a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's validity and disregards established principles of participation in decisions affecting cultural and environmental interests.

Furthermore, there is a critical procedural failure, as a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018, has not been conducted. Without this assessment, the competent authority cannot legally evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination of the proposal unlawful.

From a policy standpoint, these failures conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and to recognise living cultural practices marks a clear deviation from policy requirements.

When viewed collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development remain unassessed, and the application does not offer a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposal is fundamentally inadequate and lacks the necessary transparency for a lawful assessment. While the developer commissioned a Social Impact Assessment that included focus group discussions with local residents, the full report has not been made available. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the complete range of social risks identified by the developer's own research.

Residents have reported experiencing noticeable levels of stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts stem directly from local engagement and are therefore grounded in reality rather than speculation. However, the inability to access the comprehensive assessment restricts the opportunity for proper scrutiny of the findings, consequently limiting the capacity to ascertain their relevance in the decision-making process.

Furthermore, there are indications that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite the

seriousness of these implications, they have not been adequately incorporated into the main application or given the necessary weight. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs of the development.

The lack of transparency has detrimental effects on the Environmental Impact Assessment process. A thorough understanding of social, economic, and health repercussions is crucial for developments of this magnitude, especially where community character and functionality may be impacted. By not providing the entire dataset, the application fails to deliver a comprehensive evidential basis for evaluating the balance of benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm, yet available evidence suggests existing adverse effects that have not been fully disclosed. In the absence of the full assessment, it cannot be shown that compliance with this policy is achieved.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health assessment without the complete Social Impact Assessment. This constitutes a significant omission within the application and indicates a failure to meet the evidential standards set by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with the evidence of current negative impacts, leads to an incomplete and unreliable evaluation. This hinders a lawful determination and strengthens the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and dominant industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, failing to adequately reflect the scale of change or the sensitivity of the receiving environment.

The proposal does not accurately represent the magnitude of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts within such a sensitive landscape.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully encapsulate the most sensitive receptors or worst-case scenarios, especially concerning key cultural

heritage sites and high-value landscapes. This raises the risk that the magnitude of visual impact has been understated, undermining the assessment's reliability.

A critical deficiency exists in the failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting interlinked by visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets as isolated entities rather than recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

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

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

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines ensure their presence would be dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, unable to be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The lack of comprehensive detail in the assessment of construction and pollution risks is alarming, as it fails to provide the necessary information to evaluate potential environmental effects. The proposal involves significant seabed preparation and installation activities within a high-energy Atlantic setting, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are set to be formulated after consent is granted, which obstructs any meaningful evaluation of their potential adequacy or effectiveness.

This approach is particularly troubling given the sensitive nature 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 the possibility of

accidental chemical or oil spills, it falls short of providing adequate detail on preventive, control, or monitoring measures.

Further compounding these issues is the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without rigorous modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Moreover, the absence of detailed emergency response procedures intensifies these concerns. By postponing contingency planning until after consent has been granted, the application inhibits a proper evaluation of whether sufficient safeguards are in place to handle pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent; when such information is absent, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

Collectively, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts culminate 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 assessment regarding fisheries and marine life is inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a varied marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these important habitats and uses will be safeguarded without substantial disruption.

A notable concern is the presumption that fishing activity can be displaced without repercussions. There is no evidence provided that indicates alternative fishing grounds are available, easily accessible, or capable of withstanding additional pressures. This absence of information is critical, as such displacement poses risks of overfishing in other areas and could result in broader economic consequences for the local fishing fleet. Without a detailed and evidence-based analysis, understanding the impacts on fisheries and local livelihoods remains elusive.

Furthermore, the proposal presents considerable risks to marine species, particularly

due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to create disturbances across extensive areas, affecting species like dolphins. The potential disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. Nevertheless, the application minimises the significance of these effects without adequate supporting evidence.

There exists a contradiction within the application, wherein the requirement for licences to permit harm to European Protected Species is acknowledged, yet the impacts are described as negligible. This inconsistency undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a fragmented assessment of onshore infrastructure, failing to acknowledge the interconnected nature of the offshore turbines and onshore works. This separation obscures the complete environmental and socio-economic impacts that arise from what is fundamentally a single integrated project. The onshore components involve significant activities, including cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure through sensitive landscapes. Notably, excavation will occur in areas of deep peat, particularly within Barvas Moor, which is a critical carbon store and ecologically sensitive habitat. The current application lacks a thorough examination of these effects, leading to an incomplete understanding of the overall environmental footprint of the project.

By choosing to exclude or delay the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered together.

However, the disjointed treatment of offshore and onshore elements means that the combined implications for peatlands, habitats, and local communities remain unclear.

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which enjoy policy protection. The application does not sufficiently demonstrate that impacts on these vital ecosystems have been adequately assessed or that effective avoidance measures have been put in place, revealing a significant gap in evidence concerning biodiversity protection.

Concerns are also raised regarding the carbon balance associated with the proposal. The disturbance of peatland releases stored carbon, which could result in a carbon debt that contradicts the renewable energy development objectives. The application fails to address this matter adequately or to show that the overall carbon balance is indeed beneficial.

The routing of infrastructure through active croft land introduces further potential conflicts with established land use and legal rights. There is no evidence presented that the requisite consents or processes have been initiated, casting doubt on both the deliverability and lawful implementation of the project.

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

In summary, the division of project components, absence of thorough assessment, and lack of evidence concerning environmental and land use impacts culminate in an application that is incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment of the West Lewis coastline, which is characterised by exceptionally dark skies. These dark skies are vital to the area's environmental quality, cultural identity, and tourism value, yet the Environmental Impact Assessment completely omits any consideration of dark skies and nocturnal wildlife.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experience of residents and visitors, despite the significant importance of dark skies to local identity and emerging tourism sectors, including astro-tourism. This lack of assessment creates a clear gap in the overall landscape and environmental evaluation.

Moreover, the assessment does not address the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased collision risk. The application lacks a lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting could affect these species or raise mortality rates.

This omission is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been examined. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without a proper assessment of nocturnal impacts, it cannot be determined whether protected species or designated sites would suffer adverse effects. The necessary evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which engages the precautionary principle and prevents lawful determination.

From a policy standpoint, this omission is at odds with 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 night-time is an integral aspect of the environment.

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

TOURISM

The application proposes large-scale offshore infrastructure, yet it lacks a thorough assessment of the tourism impacts, which are crucial for the Isle of Lewis economy. Tourism relies heavily on the area's natural attributes, including its wild coastline, nearly unspoiled landscapes, dark skies, and the feeling of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantifiable evaluation of how this infrastructure would affect visitor numbers, behaviours, or the overall economic contribution of tourism.

Since 2017, tourism has seen remarkable growth, rising from £65 million 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 model how the industrialisation of the seascape and degradation of environmental quality could impact Tourism Gross Value Added or the wider economic resilience of the area. Without this crucial analysis, it remains impossible to ascertain whether the development would offer a net economic benefit or potentially jeopardise an important and expanding sector.

Moreover, the application neglects to consider the significance of environmental quality for tourism, particularly the value of unspoiled landscapes and dark skies for the visitor experience. This oversight extends to emerging markets such as nature-based tourism and astro-tourism, compounded by the absence of a Dark Skies Assessment that would clarify impacts on a significant part of the local economy. In a community with limited economic diversity, this failure to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that economic vulnerabilities have not been adequately assessed, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not sufficiently demonstrate compliance with National Planning Framework 4 regarding economic impact and the necessity of showing a net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and does not provide the evidence necessary for the competent authority to evaluate the economic ramifications of the proposal. Collectively, these shortcomings in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and acknowledging the island's economic dependency result in a substantial evidential gap. This gap hinders a thorough evaluation of the economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary requirements for sustainable development. It does not align with statutory duties, national policy, or evidential standards. This proposal repeats the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the extent of industrialisation. Although the current application is presented under a stronger policy framework, it still does not adequately address biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical gaps in the evidential basis for determination. The application lacks complete baseline data, relies on an undefined design envelope, and specifies mitigation measures that have not been fully articulated. It omits essential impact pathways concerning nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and does not provide a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural failures are evident. The absence of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018. Furthermore, not disclosing the complete Social Impact Assessment is a significant omission. These deficiencies hinder the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal remain unclear and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

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

Additional Comments

[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: 1FA05295

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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.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based assessment of alternatives, which is crucial under the Environmental Impact Assessment regime. Rather than presenting a reasoned comparison of viable alternatives based on their environmental impacts, it offers a narrative focused on the project's development. This

narrative does not sufficiently show that the developer has adequately identified and evaluated less harmful options in favour of those that are more damaging.

There is a lack of transparent analysis concerning alternative offshore locations, various scales of development, and potential design configurations. Notably, the application does not indicate that the developer has genuinely considered placing the turbines further offshore, an action that could mitigate visual, ecological, and coastal effects. Considering the sensitivity of the West Lewis coastline, the failure to address the importance of distance from shore in assessing impacts prevents a determination that the proposed site is the least damaging option available.

Moreover, the shortcomings extend to the routing of cables and the assessment of landfall sites, where there is inadequate evidence that alternative routes have been thoroughly examined to lessen impacts on sensitive receptors, including areas of cultural significance such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest a failure to apply mitigation by design, relying instead on post-design measures that may not be effective.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout planning, and infrastructure routing. This indicates a disregard for the established mitigation hierarchy, leaving the competent authority unable to ascertain whether there are more appropriate and less harmful alternatives. Without a comprehensive assessment of alternatives, it is impossible to assert that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment represents a significant omission, contributing to the overarching conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The current assessment of marine ecology and protected species is significantly inadequate and fails to deliver a comprehensive or reliable understanding of ecological receptors within the coastal environment of West Lewis. This area is a sensitive and biologically active marine system, yet it is characterised by incomplete baseline data and methodologies that do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a sound evidential basis for the evaluation of potential impacts.

One notable deficiency concerns otters, classified as a European Protected Species. The application does not adequately recognise or assess their active use of coastal regions for foraging and movement. By neglecting to account for their core foraging range and behavioural patterns, the assessment falls short in evaluating the potential

impacts of construction disturbance, noise, and increased human activity. This gap undermines any conclusions drawn regarding the absence of significant effects on this particular species.

Moreover, there are further shortcomings in the assessment of basking sharks, as the reliance on aerial surveys introduces a substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of these animals, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to incorporate or adequately consider such relevant data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

The methodological shortcomings lead to conclusions regarding negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty about the actual scale of risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment framework and National Planning Framework 4, as there has been insufficient identification and assessment of protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies inhibit a robust evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application lacks an adequate evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant gaps in evidence and internal inconsistencies, rendering its conclusions unreliable. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to meet the necessary evidential standards to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located near the proposed development, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss.

There exists a fundamental contradiction within the application, as the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that

the conclusions drawn are not substantiated by the evidence provided. The assessment lacks sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been thoroughly considered, and the reliance on modelling approaches adds uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies used likely underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor introduces additional risks, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term effects of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to conclude that there would be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle and inhibits a lawful conclusion in favour of consent. Furthermore, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal directly at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity related to the proposed development is insufficient and fails to acknowledge the West Lewis coastline as a dynamic cultural landscape, where environment, language, tradition, and community are interconnected. The application adopts a simplified viewpoint, regarding heritage as merely a collection of isolated, unchanging assets, rather than recognising their active social, cultural, and spiritual significance within the community.

A significant oversight is evident in the assessment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active locations for burial and spiritual activities, yet the assessment classifies them as static elements, neglecting their ongoing utilisation, significance, and the potential effects of development on their surroundings. This erroneous classification leads to an inadequate appraisal of cultural impacts, omitting their relevance to community life.

Moreover, the assessment fails to encompass intangible cultural heritage, including the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These aspects are fundamental to the identity of the region but have been entirely overlooked in the assessment, constituting a substantial omission. The absence of consideration for these elements hinders a proper understanding of the development's cultural impact.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population possesses a unique cultural identity that is recognised as characteristic of an Indigenous People. However, no process of Free, Prior and Informed Consent has been conducted. This lack of meaningful engagement calls into question the validity of the assessment and does not align with established participatory principles in decisions that affect cultural and environmental matters.

A notable procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic repercussions on the island community. This singular omission is sufficient to obstruct a lawful determination.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and sites. The failure to address both tangible and intangible heritage, along with the disregard for ongoing cultural practices, represents a clear violation of policy standards.

In conclusion, the neglect to assess living heritage, intangible cultural values, community rights, and statutory duties culminates in a considerable evidential void. The cultural impacts of the development have not been adequately analysed, and the application does not furnish a reliable foundation for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's Social Impact Assessment, which included focus groups with local residents, has not been fully published. This lack of transparency creates a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified by the developer.

Summaries suggest that residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct community engagement, not speculation. However, without access to the complete assessment, proper scrutiny of the findings is not possible, which limits the assessment of their significance in the decision-making process.

Additionally, there is evidence that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, the

impacts have not been adequately included in the main application or given the necessary weight. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function could be affected. By not providing the complete dataset, the application lacks a solid evidential basis to weigh the benefits against potential harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments should foster positive health outcomes and avoid harm, yet existing adverse effects indicated by available evidence have not been fully disclosed. Consequently, without the full assessment, compliance with this policy remains unproven.

The procedural ramifications are significant. The competent authority cannot conduct a comprehensive socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing negative impacts, renders the assessment incomplete and unreliable. This hinders a lawful determination and underlines the inadequacy of the information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts lacks depth and does not adequately capture the significant changes expected nor the sensitivity of the surrounding environment. The coastline of West Lewis features an expansive Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The proposed installation of large turbines near the shoreline would create an overwhelming industrial presence that would fundamentally alter this landscape, leading to a permanent change.

Moreover, the application does not fully convey the extent of this visual alteration. The size and location of the turbines would dominate views from residential properties, historical sites, and popular coastal areas, affecting visual amenity and detracting from the qualities of naturalness and remoteness. The assessment does not effectively demonstrate the impact's significance within such a sensitive landscape.

There are concerns regarding how visual viewpoints were chosen and presented. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning important cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been underestimated, questioning the assessment's reliability.

Another significant shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape connected to the Atlantic horizon through visual and spatial relationships. The assessment regards these sites as separate entities rather than acknowledging their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural value.

The industrialisation of the seascape would disrupt these relationships, altering how heritage sites are perceived and severing their connection to the natural horizon. This results in both visual and broader cultural harm that has not been adequately evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The level of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any argument for compliance with policy.

It is also evident that the identified impacts cannot be sufficiently mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resulting change is therefore substantial and enduring, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the extent of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal does not align with the protection of this 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 a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life within the application is insufficient, lacking a robust evaluation of both ecological and socio-economic impacts. It fails to demonstrate that existing uses and habitats can be protected or maintained without significant disruption.

A major concern is the assumption that fishing activity can be displaced without consequences. The application does not provide evidence that alternative fishing grounds are available or capable of supporting increased pressure. This is a critical oversight, as the risk of overfishing elsewhere could have wider economic repercussions for the local fishing fleet. Without a clear and evidence-based assessment, the impacts on fisheries and local livelihoods remain inadequately understood.

Additionally, the proposal introduces substantial risks to marine species, particularly due to the underwater noise generated during construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over large distances, including species such as dolphins. The anticipated impact on a significant portion of

the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without adequate supporting evidence.

There is an 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 undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where potential harm necessitates legal authorisation.

Furthermore, the assessment neglects to consider cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive 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 does not demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal embodies sustainable development.

The lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment collectively render it incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is incomplete and fails to capture the full range of impacts associated with what constitutes a single integrated project. The onshore and offshore components, including the construction of a substation near Stornoway and cabling across protected moorland, are linked. However, they are currently assessed separately, which leads to a fragmented understanding of the true environmental and socio-economic consequences.

Significant ecological risks arise from the proposed works, particularly due to excavation in areas of deep peat on Barvas Moor, which is both a vital carbon store and an ecologically sensitive area. The application does not adequately address or assess these impacts, leading to an incomplete picture of the project's overall environmental footprint. Additionally, sensitive habitats, such as machair systems and peatland environments, are protected under policy, yet the application does not show that impacts on these areas have been thoroughly evaluated or that suitable avoidance measures are in place, resulting in a notable gap in evidence regarding biodiversity protection.

The proposal further raises alarm over carbon balance. Disturbing peatland has the potential to release stored carbon, thus creating a carbon debt that undermines the

objectives of renewable energy initiatives. The application inadequately tackles this issue, failing to demonstrate that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights, as the application does not provide evidence of having initiated the necessary consents or processes. This absence raises concerns about the feasibility and legality of the project's implementation.

On a policy level, the disjointed assessment of the project and the lack of demonstrated protection for peatlands, habitats, and land use interests conflict with established frameworks, including the National Marine Plan and National Planning Framework 4. The failure to show that impacts can be avoided or mitigated further weakens the application.

In summary, the combination of separating project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts results in a substantial shortfall in the application, rendering it incomplete and unreliable. This compromises the possibility of a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment notably lacks any examination of dark skies and nocturnal wildlife, which is a serious omission. The West Lewis coastline is renowned for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that will be visible over considerable distances, creating an intrusive "wall of light" effect along the western horizon and fundamentally changing the night-time landscape.

Furthermore, the application fails to evaluate how this lighting will impact visual amenity, landscape character, or the experience of both residents and visitors. This is particularly significant considering the crucial role dark skies play in the local identity and the growth of tourism sectors such as astro-tourism. The neglect of these issues indicates a clear deficit in the overall landscape and environmental evaluation.

More concerning is the lack of analysis 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, which can cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a study on phototaxis means there is no consideration of how aviation lighting could impact these species or heighten mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activities or associated dangers. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this potential threat has not been evaluated. The lack of site-specific night-time data results in a significant gap in

understanding the ecological implications.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 regarding the protection of natural environments and the preservation of environmental quality. Additionally, they weaken the overall assessment of landscape and seascape impacts since the character of night-time environments is a vital aspect of the ecological landscape.

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

TOURISM

The assessment of tourism impacts associated with the proposed development is fundamentally inadequate, particularly regarding its implications for a critical component of the Isle of Lewis economy. Tourism relies heavily on the area's natural attributes, including its wild coastline, near-pristine landscapes, dark skies, and the overall sense of remoteness. The application acknowledges that a substantial 86% of visitors are attracted by the scenic beauty; however, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism on the Isle of Lewis has seen considerable growth, with revenues increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for approximately 16% of the island's economy. Despite this positive trend, the application neglects to model the potential impact of the industrialisation of the seascape and the consequent degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without a thorough analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and expanding sector.

Additionally, the assessment overlooks the vital role of environmental quality in sustaining tourism, particularly 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 exacerbates this oversight, creating a notable gap in understanding the potential impacts on this recognised and growing segment of the local economy. In a context where the island community faces limited economic diversification, this failure to evaluate tourism impacts has far-reaching consequences for employment, local businesses, and community sustainability. The

omission of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been adequately addressed, contrary to the requirements set forth under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not sufficiently demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to illustrate a net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector and fails to provide the necessary evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, assessing the environmental factors that influence visitor behaviour, and considering the island's economic dependencies culminate in a significant evidential gap. This deficiency obstructs a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed, failing to meet the requirements of sustainable development as assessed against statutory duties, national policy, and evidential standards. It echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short.

There are significant gaps in the evidential basis for the proposal. The use of an undefined design envelope, unspecified mitigation measures, and critical omissions regarding impact pathways—including nocturnal wildlife, complete onshore infrastructure, and tourism effects—render the Environmental Impact Assessment inadequate. This incompleteness prevents a comprehensive understanding of likely significant effects and residual impacts.

The proposal also suffers from procedural deficiencies, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duties established by the Islands (Scotland) Act 2018. Furthermore, the failure to provide a full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thus deeming the application unfit for determination.

In addition, the proposal conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, and cultural heritage. The application fails to confirm that health and wellbeing impacts are acceptable and lacks tourism impact modelling, preventing it from evidencing a net economic benefit. The assessment of cumulative impacts from both offshore and onshore elements has not been conducted properly, obscuring potential effects on

peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially severe. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs any lawful and evidence-based decision-making. It is essential for the competent authority to either refuse consent on these grounds or to invoke the appropriate regulatory provisions to demand the submission of the necessary missing information.

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

Additional Comments

The impact on the environment and economy will be devastating and irreversible and alternatives must be considered. Local need must be at the forefront and not for export.

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: 961A177D

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with marine licensing and Environmental Impact Assessment regulations. It is based on an analysis of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. This proposed development is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing shores, near-pristine environment, and rich cultural heritage. Concerns about the scale, design, and proximity of the project raise serious questions about its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful decision. Important environmental data is absent, baseline information is sparse and inconsistent, and critical elements of the proposal remain unclear. The adoption of a flexible design framework inhibits a precise assessment of potential significant effects, while reliance on unspecified mitigation measures prevents evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community implications, and assertions of negligible or non-significant effects are not substantiated by adequate evidence.

There are evident and substantial conflicts with policy. The proposal does not seem to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not illustrate that it can satisfy national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies are critical to the statutory tests required for consent and weaken the ability of the competent authority to determine the development's acceptability according to policy.

The scale of this proposal is unprecedented for the region, with large turbines planned in close proximity to the shoreline, raising serious issues regarding landscape capacity, visual impact, and environmental consequences. In summary, the combination of insufficient information, reliance on undefined mitigation measures, evidential gaps, and clear policy non-compliance indicates that the application is incomplete and cannot sustain a lawful decision. Therefore, the precautionary principle should be applied in this situation.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application does not provide a structured, evidence-based assessment of alternatives as required by the Environmental Impact Assessment regime. Instead, it presents a narrative of project evolution, lacking a reasoned comparison of realistic

alternatives based on environmental effects. This failure to identify, assess, and prefer less harmful options over more damaging solutions is a significant oversight.

There is also no transparent examination of alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has seriously considered positioning turbines further offshore, where there would likely be a reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the crucial role of proximity to shore in determining impact, means that the lack of this analysis prevents a conclusion that the proposed site is indeed the least damaging option.

The deficiencies extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy, alongside a lack of comparative analysis, suggests that mitigation by design has not been employed, leading to reliance on post-design mitigation measures instead.

Consequently, the application fails to show that environmental harm has been minimised through proper site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. Without a thorough assessment of alternatives, it cannot be determined that the proposal is a sustainable or compliant solution in line with policy requirements.

From a policy standpoint, this deficiency calls into question 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 is a material omission that contributes to the conclusion that the application has not been properly evaluated and cannot justify a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns regarding the assessment of marine ecology and protected species, which is notably deficient and fails to deliver a comprehensive or reliable understanding of the ecological receptors present in the West Lewis coastal environment. This marine system is recognised as being highly sensitive and biologically active, yet the baseline data gathered is inadequate, and the methodologies employed do not effectively capture essential information on species presence, behaviour, and habitat utilisation. Consequently, the assessment does not provide a solid evidential foundation for evaluating potential impacts.

A critical shortfall in the assessment relates to otters, a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means that the assessment does not adequately consider the

potential impacts of construction disturbance, noise, and increased activity. This lack of thorough analysis compromises the conclusions drawn regarding the absence of significant effects on this species.

Moreover, there are further shortcomings in the assessment of basking sharks, particularly due to an overreliance on aerial surveys, which creates significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of basking sharks when compared to established land-based observations that indicate these waters are used frequently. The failure to incorporate or properly consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings result in claims of negligible or non-significant effects being founded on assumptions rather than solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty about the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set by the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced prevents the clear exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these factors, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and lacks the rigorous evidence needed to support its conclusions. It overlooks the critical fact that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. The application fails to provide adequate assurance that these species will not be adversely affected, particularly given that the development is situated within vital foraging areas and migratory pathways. The assessment does not thoroughly consider the risks of displacement, collision, or habitat loss that may arise from the project.

Moreover, there is a glaring contradiction in the application, as the developer asserts that no significant adverse effects will occur while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the credibility of the assessment and raises

doubts about the validity of its findings. The evidence presented does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical feeding grounds for these birds are not adequately evaluated, and the reliance on modelling raises significant uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially where baseline data is lacking and the behavioural responses of the species are not fully understood.

The placement of turbines within a recognised migratory corridor presents an additional risk by creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of sustained mortality within this corridor or the potential impact on species with limited global populations. From a regulatory standpoint, the application does not meet the necessary evidential standards to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data gaps, and limitations in modelling all contribute to a failure to achieve the standard of beyond reasonable scientific doubt. This situation engages the precautionary principle and undermines the legal basis for granting consent.

In addition, the identified deficiencies demonstrate non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not suffer adverse effects places this proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. Such shortcomings impede a thorough evaluation of potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely deficient, neglecting the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic perspective, reducing heritage to a collection of isolated, unchanging features instead of recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet the assessment inaccurately describes them as static entities, overlooking their ongoing significance, usage, and the development's effects on their surroundings. This misunderstanding results in an incomplete cultural evaluation and fails to account for their importance to community life.

Moreover, the assessment disregards intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These critical aspects of identity are entirely omitted, representing a substantial gap in the evaluation. Without acknowledging these factors, the true cultural impact of the proposed development cannot be fully grasped.

Concerns regarding community rights and engagement also arise. The Gaelic-speaking population embodies a unique cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement significantly undermines the assessment's credibility and fails to adhere to established participatory principles in cultural and environmental decision-making.

Additionally, there is a notable procedural oversight in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority is unable to meet its legal obligation to assess the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and locations. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, clearly violates policy expectations.

In summary, the neglect to adequately evaluate living heritage, intangible cultural significance, community rights, and statutory duties results in a substantial evidential void. The cultural ramifications of the development have not been properly examined, and the application fails to provide a solid foundation for assessing the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment which included focus groups with local residents; however, the full report has not been published. This absence represents a significant evidential gap and inhibits both the public and the competent authority from fully understanding the 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 proposal. These impacts arise from direct engagement and are thus not speculative in nature. Nonetheless, the non-disclosure of the complete assessment limits scrutiny of the findings and restricts the ability to determine their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been fully incorporated into the main application nor given the appropriate weight they merit. Withholding the complete Social Impact Assessment obscures the true human and social cost associated with

the development.

The lack of transparency undermines the Environmental Impact Assessment process. For developments of this scale, a comprehensive understanding of social, economic, and health impacts is crucial, particularly when community character and functioning may be affected. By failing to provide the complete dataset, the application does not offer a robust evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development must promote positive health outcomes and mitigate harm, yet the evidence available indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy cannot be confirmed.

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

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This situation hinders lawful determination and further supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal significantly undermines the assessment of seascape, landscape, and visual impacts, failing to adequately capture the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its expansive Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large turbines near the shoreline would establish a persistent industrial presence, fundamentally transforming this character and resulting in a permanent alteration of the landscape.

The application does not sufficiently illustrate the extent of this visual change. The turbines' scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately reflects this level of impact or its significance within such a sensitive landscape.

Methodological issues arise regarding the selection and representation of visual viewpoints. There is evidence indicating that the viewpoints chosen may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been understated, which compromises the reliability of the assessment.

Furthermore, there is a failure to evaluate the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, visually and spatially linked to the Atlantic horizon. The assessment treats these important assets in isolation, neglecting their interdependence and leading to an incomplete evaluation of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and 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 thoroughly assessed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural environments and historic assets. The 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 thorough worst-case assessment further diminishes any assertion of policy compliance.

It is evident that the impacts noted cannot be effectively mitigated. Due to the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. The resulting transformation is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

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

The sensitivity of the receiving environment heightens the concerns associated with this reliance on undefined future measures. The West Lewis coastline is home to clean coastal waters and critical habitats that are particularly vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

There is further uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also extends to potential effects on sensitive marine species and habitats identified in the broader assessment.

Additionally, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards will be established to respond effectively to pollution events. This situation introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of crucial environmental safeguards conflicts with the requirements set forth by the Environmental Impact Assessment regime. It is essential that likely significant effects and their mitigation are assessed prior to consent; without such information, a lawful determination cannot be achieved. The application also falls short in demonstrating compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, detailed management plans, and the uncertainty regarding potential impacts culminate in 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 the proposed development's impact on fisheries and marine life is severely lacking, leading to significant concerns about ecological and socio-economic consequences. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not adequately demonstrate how these vital resources can be safeguarded without causing major disruptions.

A critical flaw in the application is the assumption that fishing activities can simply be displaced without any repercussions. There is no evidence presented to suggest that alternative fishing grounds exist or that they could support the additional pressure created by such displacement. This gap is crucial, as it poses risks of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a detailed and evidence-based assessment, the effects on fisheries and the livelihoods they support remain inadequately understood.

The proposal also raises significant risks for marine species, particularly due to the underwater noise generated during the construction phase. Extended periods of high-energy hammer piling are expected to cause disturbances across extensive areas,

adversely affecting species such as dolphins. The application downplays the potential impact on a significant proportion of the local bottlenose dolphin population, raising serious concerns, yet it lacks sufficient evidence to support these minimal assessments.

Moreover, there is an evident inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This contradiction undermines the reliability of the assessment and raises questions about adherence to the Habitats Regulations, especially when harm is expected to the extent that it requires legal permission.

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

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

In conclusion, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions found within the application collectively render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a comprehensive assessment of the onshore infrastructure, which is materially incomplete. It neglects to consider the full scope of impacts resulting from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically connected; however, their separate assessments lead to a fragmented understanding that obscures the true scale of environmental and socio-economic effects.

Among the onshore components are cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and associated access infrastructure that traverses sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, an area recognised for its ecological sensitivity and as a significant carbon store. The absence of a thorough evaluation of these impacts inhibits a complete understanding of the overall environmental footprint of the project.

By omitting or delaying the assessment of onshore impacts, the application hinders an

appropriate evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are considered in conjunction. However, the distinct treatment of offshore and onshore elements results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities.

The proposal also raises significant concerns regarding sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, thus highlighting a substantial evidential gap in relation to biodiversity protection.

Additionally, the routing of infrastructure through active croft land introduces potential conflicts with established land use and legal rights. There is a lack of evidence indicating that the necessary consents or processes have been initiated, which raises concerns about the deliverability and lawful execution of the project.

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

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of substantiated evidence concerning environmental and land use impacts render this portion of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an assessment of dark skies and nocturnal wildlife, which constitutes a significant omission. The coastline of West Lewis is characterised by its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism appeal. The proposed introduction of permanent red aviation lighting, which would be visible over extensive distances, is anticipated to create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

There is no consideration of how this lighting may impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly significant given the critical role of dark skies in the local identity and the growing sectors of astro-tourism. The failure to evaluate these impacts highlights a considerable gap in the overall assessment of the landscape and environment.

Equally concerning is the absence of an evaluation concerning nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit a high sensitivity to artificial lighting due to phototaxis, which can result in

disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to address how the proposed aviation lighting could affect these species or contribute to increased mortality rates.

This shortfall is exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The failure to provide site-specific night-time data creates a crucial gap in the understanding of ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites might face adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt remains unfulfilled, necessitating the application of the precautionary principle and precluding a lawful determination.

From a policy standpoint, these omissions contravene the National Planning Framework 4 in terms of protecting natural environments and ensuring environmental quality. Furthermore, this lack of assessment undermines the comprehensive evaluation of landscape and seascape impacts, given that the character of the night-time environment is a vital aspect of the overall ecosystem.

In summary, the failure to assess dark skies and nocturnal wildlife creates a substantial evidential gap. The application is incomplete, lacking essential baseline data, impact modelling, and species-specific analyses, rendering it inadequate for supporting a lawful determination.

TOURISM

The assessment of tourism impacts within the application is critically inadequate, neglecting to analyse the economic and social ramifications for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are key to tourism, which is predominantly driven by these factors. Despite the application acknowledging that 86% of visitors are attracted by the scenery, it does not provide any quantified evaluation of how large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Tourism on the Isle of Lewis has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the local economy. However, the application falls short by not modelling the potential impact of seascape industrialisation and a decline in environmental quality on Tourism Gross Value Added or the broader economic resilience of the island. Without this analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise a significant and expanding sector.

Additionally, the assessment overlooks the critical role that environmental quality plays in supporting tourism. Unspoiled landscapes and dark skies are essential for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this gap, leaving a significant void in understanding the implications for this recognised and growing aspect of the local economy.

In a community such as this island, which has limited economic diversification, the neglect to evaluate tourism impacts carries broader consequences for local employment, businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been scrutinised as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate alignment with National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector, lacking the necessary evidence for the competent authority to thoroughly assess the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, consider the environmental factors that drive visitor behaviour, and acknowledge the island's economic dependencies leads to a significant evidential shortcoming. This inadequacy obstructs a comprehensive evaluation of the economic effects and supports the view that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant shortfall in meeting sustainable development criteria when evaluated against statutory obligations, national policy, and evidential requirements. It echoes the principal concerns that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Presenting the application under a more stringent policy framework, it fails to adequately address issues such as biodiversity, peatland safeguarding, landscape preservation, and community wellbeing.

There is a notable absence of a complete and reliable evidential basis for consideration of this application. Gaps in baseline data are critical, compounded by the continued reliance on an unspecified design envelope and mitigation measures that lack detail. Furthermore, key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have not been addressed. As a result, the Environmental Impact Assessment is incomplete, inhibiting a comprehensive understanding of potential significant effects and residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties established under the Islands (Scotland) Act 2018. Additionally, the failure to provide a comprehensive Social Impact Assessment represents 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 unfit for determination.

In direct contradiction to National Planning Framework 4, the proposal fails to protect biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact analysis. The failure to properly assess the cumulative impact of both offshore and onshore components obscures the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially considerable. The evaluations regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and preventing a lawful determination that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The combination of substantial information deficiencies, conflicts with policy, and unresolved environmental risks inhibits a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or utilise the relevant regulatory mechanisms to require the submission of the outstanding information.

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

Additional Comments

There are no benefits to our community that will outweigh the damage and destruction of our landscapes and sea scapes

Will every island home receive free electricity? Will they even receive a discount?

We are an island of natural beauty and extreme fuel poverty
Everything about this project and its impact is a disgrace

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: FEBF45FA

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The grounds for this objection arise from an examination of the Environmental Impact Assessment Report and its associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural relevance, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, nearly unspoiled environment, and rich cultural heritage. The design, scale, and proximity of this proposal raise serious questions about its alignment with statutory standards, national policy, and sustainable development principles.

The application is lacking a sufficient evidential foundation necessary for a lawful decision. There are notable omissions of critical environmental data, while the existing baseline information is not only limited but also inconsistent. Key elements of the proposal remain vague and unclarified. The flexibility of the design framework obstructs a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the provided documentation does not facilitate a comprehensive or informed assessment of the potential impacts on the environment, culture, or community. Assertions of negligible or non-significant effects are unsubstantiated by reliable evidence.

Moreover, there are explicit and serious conflicts with existing policy frameworks. The proposal seems misaligned with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and community health and well-being. It fails to demonstrate compliance with national obligations to safeguard biodiversity, climate concerns, and environmental integrity. These discrepancies directly challenge the statutory requirements for consent, undermining the capability of the competent authority to deem the development acceptable within policy parameters.

The scale of this proposal is without precedent in this area, with large turbines situated in very close proximity to the shoreline, which raises significant apprehensions about landscape capacity, visual impact, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and evident policy conflicts illustrate that the application is incomplete and does not support a lawful decision-making process. Under these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a comprehensive, transparent, or dependable account of the anticipated environmental impacts of the proposal. The absence of commitment to specific turbine dimensions, layouts, or configurations due to the use of a flexible Project Design Envelope introduces considerable uncertainty. This lack of clarity undermines the integrity of the assessment and prevents both the public and the competent authority from comprehending the true extent of environmental effects, as the impacts presented may not correspond to the final development.

The application places substantial reliance on mitigation measures, monitoring strategies, and management plans that are not yet clearly defined. As a result, consent is sought with the premise that any environmental harm will be mitigated at a later stage, which hinders any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of essential information to post-consent stages is procedurally unacceptable and runs counter to the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

Significant evidential gaps exist, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This creates uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory obligations.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or if appropriate 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 shortcomings preclude 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 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 proposed development poses serious concerns regarding its impact on marine ecology and protected species within the West Lewis coastal environment, a sensitive and biologically rich area. The assessment provided is significantly lacking, as it fails to deliver a comprehensive and reliable understanding of the ecological receptors present. The baseline data is incomplete, and the methodologies employed are insufficient to accurately capture the presence, behaviour, and habitat use of vital species.

A particularly troubling oversight is the inadequate recognition of otters, classified as a European Protected Species. The application does not appropriately assess their active utilisation of coastal areas for foraging and movement. Without a thorough

consideration of their core foraging range and behavioural patterns, the potential impacts from construction-related disturbance, noise, and increased human activity remain unexamined. This gap severely undermines any assertions regarding the lack of significant effects on this species.

Moreover, the assessment of basking sharks suffers from significant shortcomings, primarily due to the reliance on aerial surveys that introduce a considerable detection bias, especially in challenging Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, particularly when juxtaposed with established land-based observations that indicate their frequent use of these waters. The omission of such pertinent data contributes to an incomplete baseline and diminishes the credibility of the findings presented.

These methodological flaws mean that any conclusions indicating negligible or non-significant effects rely more on assumptions than on substantial evidence. The insufficient baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. Consequently, there is considerable uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess protected species. This level of uncertainty prevents the ability to rule out adverse effects beyond reasonable scientific doubt, thereby necessitating the application of 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 renders the assessment unreliable. These significant deficiencies hinder a thorough evaluation of the impacts on marine ecology and protected species and lead to the overall conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises serious concerns due to significant deficiencies in the ornithological assessment that challenge its credibility. The application does not adequately demonstrate that internationally important seabird populations, which are already declining, will not face adverse effects. Specifically, the west coast of the Isle of Lewis, known for its key foraging areas and migratory pathways, is threatened, yet the assessment lacks a thorough evaluation of potential displacement, collision risks, and habitat loss.

A critical inconsistency within the application is evident: the developer asserts that no significant adverse effects will occur, while simultaneously proposing a Habitats Regulations derogation, which is only warranted when significant harm is anticipated. This contradiction raises doubts about the reliability of the assessment and casts doubt

on the conclusions drawn from it.

Moreover, the assessment fails to provide convincing evidence regarding the impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding areas is not fully acknowledged, and the dependence on modelling approaches introduces additional uncertainty, particularly concerning vulnerable species like Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor poses further risks, creating a barrier along a primary flight path that species rely on for travel between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately addressed, nor are the potential impacts on species with limited global populations.

From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to ascertain that there will be no adverse effects on the integrity of protected sites. The contradictory conclusions, alongside data gaps and limitations in modelling, indicate that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and obstructs a lawful conclusion in favour of consent.

Additionally, the identified deficiencies constitute a failure to comply with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to prove that internationally important seabird populations will remain unaffected directly contradicts national policy.

In conclusion, the assessment's internal inconsistencies, methodological flaws, and lack of sufficient evidence render it unreliable. These inadequacies hinder a comprehensive evaluation of impacts and lead to the overall determination that the application does not satisfy the statutory criteria required for approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development application significantly underestimates the importance of cultural heritage and community identity along the West Lewis coastline, neglecting to recognise it as a dynamic cultural landscape where the environment, language, tradition, and community are deeply intertwined. It adopts a simplistic view, regarding heritage merely as a collection of separate, static features, while failing to appreciate their vital social, cultural, and spiritual roles within the community.

A notable shortcoming is evident in the handling of culturally significant locations such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual rituals, yet they are described in the assessment as fixed elements, overlooking their ongoing significance, usage, and the potential repercussions of development on their surroundings. This incorrect categorisation

leads to an inadequate evaluation of cultural implications and neglects their integral role in community existence.

Moreover, the assessment does not account for intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely omitted from the evaluation, which represents a considerable gap. Without incorporating these aspects, the cultural consequences of the development cannot be accurately assessed.

Concerns also arise regarding the rights of the community and their engagement in this process. The Gaelic-speaking population, embodying distinct cultural characteristics akin to those of an Indigenous People, has not been afforded the opportunity for Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the credibility of the assessment and fails to adhere to established participation principles regarding decisions that influence cultural and environmental matters.

A crucial procedural flaw lies in the absence of a compliant Island Communities Impact Assessment, as mandated by the Islands (Scotland) Act 2018. Without this necessary evaluation, the competent authority is unable to meet its legal obligations to assess the social, cultural, and economic effects on the island community. This omission, in itself, renders the determination of the application unlawful.

From a policy standpoint, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, especially concerning the safeguarding of historic assets and locations. The neglect to consider both tangible and intangible heritage, as well as to recognise ongoing cultural practices, clearly contravenes policy requirements.

In summary, the failure to evaluate living heritage, intangible cultural values, community rights, and necessary statutory assessments culminates in a substantial evidential void. The cultural effects of the development have not been adequately appraised, and the application falls short in providing a foundation for understanding the true cultural implications of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The overall evaluation of social impacts, health, and wellbeing associated with the proposed development is insufficient and lacks the necessary transparency for a lawful assessment. Although the developer engaged local residents through a Social Impact Assessment and conducted focus groups, the complete report remains unpublished. This omission creates a significant gap in evidence, hindering both public understanding and the ability of the competent authority to grasp the full extent of social risks identified by the developer's research.

Available summaries reveal that local residents are experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposal. These reported

impacts stem from direct engagement and should not be regarded as speculative. However, without access to the complete assessment, proper scrutiny of these findings is impeded, limiting the capacity to ascertain their relevance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings indicating a risk of "cultural loss." Despite this, such impacts have not been adequately incorporated into the main application or given the attention they warrant. The failure to disclose the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A thorough understanding of social, economic, and health consequences is vital for developments of this magnitude, particularly when community character and functionality may be at stake. The application's inability to present the full dataset results in an incomplete evidential basis for weighing benefits against potential harm.

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

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

In conclusion, the non-disclosure of the full Social Impact Assessment, along with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and supports the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts lacks comprehensiveness and does not fully capture the extent of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed large-scale turbines near the shoreline would introduce a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

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

and popular coastal locations. This dominance would negatively affect visual amenity and diminish the defining qualities of naturalness and remoteness. The assessment does not effectively convey the significance of these impacts within such a sensitive landscape.

Methodological issues arise regarding the chosen visual viewpoints. There is evidence that the viewpoints may not represent the most sensitive receptors or extreme scenarios, particularly concerning important cultural heritage sites and valuable landscapes. This raises concerns that the visual impact may have been underestimated, compromising the assessment's reliability.

Additionally, the assessment does not account for the interconnectedness of landscape, seascape, and cultural heritage. Notably, sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape connected visually and spatially to the Atlantic horizon. Treating these sites as separate entities ignores their interdependence and results in an inadequate analysis of the impacts on their cultural significance and setting.

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

From a policy standpoint, the proposal contradicts the National Planning Framework 4, particularly in terms of protecting natural areas and historical assets. The magnitude of change is at odds with the need to preserve landscape character, visual amenity, and the contexts of culturally important sites. The lack of a thorough worst-case scenario assessment further weakens any claims of adherence to policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, unable to be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment related to construction and pollution risks is inadequate, failing to deliver the necessary detail for a thorough evaluation of potential environmental effects. The proposed project entails significant seabed preparation and installation activities in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to

be developed after consent, thereby inhibiting any meaningful assessment of their potential effectiveness or sufficiency.

This reliance on undefined future measures raises particular concerns, especially 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. Although the application acknowledges risks such as sediment mobilisation and possible chemical or oil spills, it fails to specify how these risks will be prevented, controlled, or monitored effectively.

Uncertainties also exist regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it becomes impossible to assess the extent, duration, or ecological impacts of these issues. This uncertainty applies to potential effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

Further 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 adequate safeguards are in place to address potential pollution incidents. This creates procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant likely effects and mitigation strategies must be evaluated prior to granting consent, and in the absence of such information, a lawful determination cannot be achieved. The application also falls short of demonstrating compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainties about potential impacts render the assessment significantly deficient. These inadequacies impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal lacks a robust assessment of fisheries and marine life, failing to adequately evaluate the ecological and socio-economic impacts associated with the development. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a functioning fishing industry; however, the application does not provide assurance that these habitats and uses will be protected or maintained without significant disruption.

A critical flaw lies in the assumption that fishing activities can be displaced without repercussions. The application offers no evidence that alternative fishing grounds are

available or capable of sustaining the additional pressure resulting from such displacement. This oversight is particularly concerning, as it poses a risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species, primarily due to underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended period is likely to cause disturbance across considerable distances, thereby affecting species including dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population raises critical concerns, yet the application minimises these effects without sufficient supporting evidence.

Additionally, the application demonstrates a clear inconsistency by acknowledging the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, particularly where harm is anticipated to the extent requiring legal authorisation.

Moreover, the assessment does not take into account the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not take into account the full extent of impacts from a single integrated project. The offshore turbines and onshore works are connected, but they have been assessed separately. This approach does not reveal the true scale of environmental and socio-economic effects.

The onshore works involve cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive

landscapes. These activities include excavation in areas of deep peat, particularly in Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, limiting understanding of the project's overall environmental footprint.

By not assessing onshore impacts, the application fails to evaluate cumulative effects properly. The Environmental Impact Assessment process mandates that all aspects of a project be considered together. However, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

Sensitive habitats, such as machair systems and peatland environments, are at significant risk and are subject to policy protection. The application does not show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This highlights a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland releases stored carbon, potentially creating a carbon debt that contradicts renewable energy development goals. The application does not sufficiently address this matter or prove that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been started, raising concerns about deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project as a whole 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 demonstrate that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks any consideration of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is notable for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposed development would install permanent red aviation lighting that would create an intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There has been no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark

skies to the local identity and to the developing sector of astro-tourism, this omission is particularly concerning. The lack of consideration for these factors highlights a clear gap in the overall assessment of landscape and environmental impacts.

Furthermore, the proposal does not address the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting, which can cause disorientation and increase the risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species, and the associated mortality risk, have not been evaluated.

Compounding this issue, the ornithological assessment relies solely on daytime survey data, failing to account for nocturnal activity and related risks. Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data results in a critical deficiency in understanding the ecological impacts of the proposal.

Without an evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing a lawful determination of the application.

From a policy standpoint, this omission contradicts the aims of National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. It also detracts from the overall assessment of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the ecosystem.

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

TOURISM

The application lacks a thorough assessment of tourism impacts, failing to address the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While it is noted that 86% of visitors are attracted by the scenery, the application does not provide any quantified assessment regarding how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the Isle of Lewis has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs. It accounts for as much as 16% of the island's economy. However, the application fails to model the potential impacts of seascape industrialisation and the associated loss of

environmental quality on Tourism Gross Value Added or overall economic resilience. Without such analysis, it remains unclear if the development could yield a net economic benefit or jeopardise an established and flourishing sector.

Moreover, the assessment neglects to consider the critical role of environmental quality in enhancing tourism, including the significance of unspoiled landscapes and dark skies in shaping visitor experiences and supporting emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a substantial gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the necessity to show 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 evaluate the economic ramifications of the proposal.

In summary, the lack of quantification regarding tourism impacts, the failure to assess environmental influences on visitor behaviour, and the neglect of the island's economic reliance culminate in a significant evidential gap. This ultimately obstructs a rigorous evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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.

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: 195E6745

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application. The application has been submitted under the marine licensing and Environmental Impact Assessment frameworks. It is located off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly pristine environment, and strong cultural identity. Upon reviewing the Environmental Impact Assessment Report and accompanying documents, several planning, environmental, cultural, and procedural issues have been identified.

The application lacks an adequate evidential basis for a lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a proper understanding of its impacts. The use of a flexible design framework creates ambiguity about significant effects, while the unspecified mitigation measures prevent any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

Furthermore, there are significant policy conflicts. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national standards for protecting biodiversity, climate interests, and environmental integrity. These discrepancies undermine the statutory tests required for consent and affect the competent authority's ability to deem the development acceptable in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a thorough and transparent account of the potential environmental consequences associated with the proposal. The incorporation of a flexible Project Design Envelope, which lacks commitment to defined turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders a consistent worst-case scenario analysis, thereby compromising the integrity of the

assessment. As a result, the reported impacts may not accurately reflect the final development, leaving both the public and the competent authority uninformed about the true environmental implications.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent on the premise that environmental harm will be managed in the future, the opportunity for a meaningful evaluation of effectiveness or assessment of residual impacts is severely limited. Deferring crucial information to post-consent stages is not procedurally acceptable and contradicts the purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation must be clearly established before any determination can be made.

Furthermore, there are critical evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty about the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear comprehension of cumulative and worst-case impacts, fostering scientific uncertainty that fails to align with statutory obligations.

Consequently, the application does not meet the evidential criteria stipulated under the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate alignment with National Planning Framework 4, including stipulations related to biodiversity preservation and environmental integrity, as it has not been shown that impacts have been comprehensively assessed or that proper safeguards are in place.

When considered collectively, the reliance on an ambiguous design envelope, the absence of specified mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report untrustworthy and incomplete. These flaws preclude a lawful and thorough assessment of environmental effects, meaning that the competent authority cannot justifiably determine the application based on the information currently provided.

ASSESSMENT OF ALTERNATIVES

The proposal lacks a thorough assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a coherent and reasoned comparison of feasible alternatives based on their environmental consequences, the application offers a narrative that recounts the project's development. This method does not establish that less harmful options have been adequately identified, evaluated, and favoured over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons of different

offshore sites, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, where the potential visual, ecological, and coastal impacts could be reduced. Given the sensitivity of the West Lewis coastline and the critical role of proximity to the shore in assessing impact, the lack of such analysis means that one cannot ascertain whether the proposed siting is indeed the least damaging option available.

These shortcomings are also evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis suggest that mitigation by design has not been considered, leading to an over-reliance on measures that come into play after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through the processes of site selection, layout, and routing of infrastructure. This oversight represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a rigorous assessment of alternatives, it is impossible to conclude that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this shortcoming undermines alignment with National Planning Framework 4, especially concerning the preservation of natural areas, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a significant omission, contributing to the overarching conclusion that the application has not been adequately evaluated and cannot be deemed lawful.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is characterised as a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is significantly lacking, providing neither a complete nor a reliable understanding of the ecological receptors present. The methodologies employed do not adequately capture species presence, behaviour, or habitat use, leading to an incomplete baseline data set that undermines the evidential basis for evaluating impacts.

One notable shortcoming is the failure to properly assess otters, a European Protected Species. The application neglects to recognise their active use of coastal areas for foraging and movement. Consequently, the assessment does not address their core foraging range or behavioural patterns, resulting in an insufficient evaluation of potential effects from construction disturbance, noise, and increased activity. This lack of consideration undermines any claims regarding the absence of significant effects on

this species.

Additionally, there are critical deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. Established land-based observations indicate frequent usage of these waters, yet such data has not been adequately incorporated or considered. The methodological limitations inherent in the assessment mean that conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. Furthermore, the absence of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating uncertainty around the actual risks to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4, as it does not properly identify or assess protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In light of these circumstances, granting consent would not be lawful.

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

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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the landscape, seascape, and cultural heritage is profoundly inadequate, failing to capture the extent of change and the sensitivity of the environment. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a notable sense of remoteness. The proposed large-scale turbines situated near the shoreline would impose a continuous industrial presence, fundamentally altering the character of the area and resulting in a permanent and irreversible transformation of the landscape.

This application does not accurately depict the scale of the visual change that would occur. The turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the severity of this impact or its significance within such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to reflect the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage

sites and valuable landscapes. This raises the possibility that the visual impact has been understated, which compromises the credibility of the assessment.

Additionally, the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage is a serious shortcoming. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked by visual and spatial relationships to the Atlantic horizon. The assessment neglects this interdependence, treating these assets as isolated, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital connections, altering the context in which heritage assets are experienced and disrupting their relationship with the natural horizon. This represents a visual impact alongside a broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the 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 comprehensive worst-case assessment further challenges any assertion of compliance with policy.

Moreover, it is evident that the identified impacts cannot be adequately mitigated. Given the scale, height, and proximity of the turbines, their presence would be a dominant and unavoidable feature. The resulting change is, therefore, fundamental and permanent, not something that can be reduced to an acceptable level through mitigation.

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and emphasise that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The lack of comprehensive detail in the assessment of construction and pollution risks is alarming, as it fails to provide the necessary information to evaluate potential environmental effects. The proposal involves significant seabed preparation and installation activities within a high-energy Atlantic setting, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are set to be formulated after consent is granted, which obstructs any meaningful evaluation of their potential adequacy or effectiveness.

This approach is particularly troubling given the sensitive nature 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 the possibility of accidental chemical or oil spills, it falls short of providing adequate detail on preventive, control, or monitoring measures.

Further compounding these issues is the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without rigorous modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Moreover, the absence of detailed emergency response procedures intensifies these concerns. By postponing contingency planning until after consent has been granted, the application inhibits a proper evaluation of whether sufficient safeguards are in place to handle pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent; when such information is absent, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

One of the major concerns is the presumption that displacing fishing activity can occur without repercussions. The application lacks any substantiation regarding the availability or accessibility of alternative fishing grounds that could absorb the additional pressure. This lack of evidence is critical, as displacement could lead to overfishing in other areas, with potential adverse economic impacts for the local fishing fleet. The absence of a detailed and evidence-based assessment means that the consequences for fisheries and local livelihoods remain unclear.

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

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

Furthermore, the assessment does not adequately account for cumulative impacts stemming from multiple stressors, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to ascertain the overall implications for marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure associated with this project is significantly deficient and does not adequately consider the comprehensive impacts of what constitutes a single integrated project. The offshore turbines and the onshore works are inherently interconnected, yet they are evaluated independently. This fragmented assessment obscures the true magnitude of environmental and socio-economic consequences.

Onshore elements encompass cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a critical carbon store and ecologically sensitive environment. The application lacks a thorough assessment of these impacts, which hinders a full understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs an appropriate analysis of cumulative effects. The Environmental Impact Assessment process stipulates that all components of a project must be considered collectively. However, the disconnection between offshore and onshore elements results in a failure to fully grasp the combined effects on peatlands, habitats, and local communities.

There are also notable risks to vulnerable habitats, including machair systems and peatland environments that are subject to policy protections. The application does not substantiate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant evidential gap in relation to biodiversity conservation.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that is at odds with the goals of renewable energy development. The application fails to sufficiently address this matter or to demonstrate that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through active croft land presents potential conflicts with established land use and legal rights. The application does not provide adequate evidence that the requisite consents or procedures have been initiated, which raises serious concerns regarding the feasibility and lawful execution of the project.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the criteria for sustainable development, as it does not align with statutory duties, national policy, or evidential standards. It mirrors the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application comes under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There is a concerning lack of a comprehensive and reliable evidential basis for the application. Key data is missing, the design envelope remains undefined, and

unspecified mitigation measures rely on assumptions rather than concrete plans. Furthermore, vital impact pathways, such as effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have not been addressed. Consequently, the Environmental Impact Assessment is inadequate, failing to elucidate the likely significant effects or residual impacts.

The process surrounding this proposal is also flawed. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment is a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for approval.

In addition, the proposal contradicts National Planning Framework 4 by not adequately protecting biodiversity, natural areas, or cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, leaving uncertainties regarding impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain ambiguous and potentially substantial. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and at times inconsistent. The evidence provided does not meet the threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and complicating any lawful conclusion regarding acceptable impacts.

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

In summary, the application is fundamentally flawed both procedurally and substantively, with significant deficiencies in information, conflicts with policy, and unresolved environmental risks. These factors hinder the ability to make a lawful, evidence-based decision. The competent authority is urged to refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or to invoke regulatory provisions to obtain the missing information.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 3F146E96

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 is grounded in a thorough review of the Environmental Impact Assessment Report and related documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The project is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. Concerns arise regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks a sufficient evidential basis for a lawful determination. Critical environmental data is missing, baseline information is inadequate and inconsistent, and essential elements of the proposal remain undefined. The adoption of a flexible design framework complicates the understanding of likely significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unassessed. Consequently, the documentation does not provide a comprehensive or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are clear conflicts with established policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact, as large turbines are planned to be located in close proximity to the shoreline. Collectively, the lack of adequate information, reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and insufficient for lawful determination. In light of these issues, the precautionary principle should be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment fails to provide a comprehensive and reliable understanding of ecological receptors within the West Lewis coastal environment, which is a biologically active and highly sensitive marine system. Key deficiencies include the incomplete baseline data and inadequate methodologies applied, which do not effectively capture the presence, behaviour, and habitat use of marine species.

Otters, classified as a European Protected Species, are notably overlooked in this assessment. There is a failure to adequately recognise and assess their use of coastal areas for foraging and movement, which leads to insufficient consideration of their core foraging range and behavioural patterns. Consequently, the potential impacts of construction disturbance, noise, and increased activity on this species have not been properly evaluated, undermining conclusions regarding the absence of significant effects.

Additionally, the evaluation of basking sharks is compromised by the reliance on aerial surveys, which introduce significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when juxtaposed with established land-based observations that indicate frequent usage of these waters. The omission of such critical data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

The limitations in methodology lead to conclusions about negligible or non-significant effects being based on assumptions rather than robust evidence. The absence of adequate baseline data further obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty about the actual risk to marine species and habitats.

From a regulatory viewpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as there has been insufficient identification or assessment of protected species. The uncertainty introduced necessitates the engagement of the precautionary principle, which indicates that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises serious concerns regarding the adequacy of the ornithological assessment, which is fundamentally flawed, revealing substantial gaps in evidence and internal inconsistencies that compromise its conclusions. The site is situated on the west coast of the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not be adversely

affected, as required by the evidential standard.

Within the assessment, there exists a significant contradiction. The developer asserts that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which should only be necessary if significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and indicates that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment fails to sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The critical nature of these feeding grounds is insufficiently acknowledged, and the reliance on modelling approaches introduces a degree of uncertainty, particularly for species facing severe decline, including Kittiwakes and Fulmars. The methodologies utilised may underestimate mortality rates, particularly in situations where baseline data is lacking and the behavioural responses of the species are not comprehensively understood.

The placement of turbines within a designated migratory corridor presents an additional risk, as it effectively creates a barrier along 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 have the potential impacts on species that possess relatively small global populations been considered.

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, together with data deficiencies and limitations inherent in the modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering the ability to lawfully support a conclusion in favour of consent.

Moreover, the identified deficiencies represent a breach of the requirements set forth in the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct opposition to national policy.

In summary, the assessment is unreliable owing to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These failings hinder a thorough evaluation of the potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements needed to support a determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage associated with the West Lewis coastline is critically flawed. It fails to acknowledge this area as a dynamic cultural landscape where the environment, language, tradition, and community are

deeply intertwined. Instead, the application reduces heritage to a series of static assets, neglecting their continuing social, cultural, and spiritual significance for the local community.

A notable shortcoming in the assessment pertains to culturally important sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual significance; however, the application inaccurately categorises them as static features without recognising their ongoing relevance and the potential impacts of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural implications and overlooks their vital role in community life.

Furthermore, the application disregards the intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the community's historical relationship with the coastal environment. These elements are essential to the area's identity and are entirely omitted from the assessment, which represents a substantial gap. Neglecting these factors severely hampers a comprehensive understanding of the cultural impacts associated with the proposed development.

Additional concerns arise regarding the rights of the community and their engagement in this process. The Gaelic-speaking population, embodying distinct cultural traits akin to those of Indigenous Peoples, has not been afforded the Free, Prior and Informed Consent process. This lack of genuine engagement undermines the credibility of the assessment and fails to adhere to established participatory principles in matters that impact cultural and environmental interests.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory requirement stipulated by the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to legally assess the social, cultural, and economic implications for the island community. The absence of this assessment alone precludes a lawful determination of the proposal.

From a policy standpoint, these shortcomings place the development proposal in clear opposition to the National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The failure to evaluate both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a significant deviation from policy expectations.

When considered collectively, the inadequacies in assessing living heritage, intangible cultural value, community rights, and adherence to statutory duties create a substantial evidential gap. The cultural impacts of the development remain inadequately addressed, and the application fails to establish a solid foundation for assessing the genuine cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and seascape impacts surrounding the proposal is fundamentally inadequate and does not properly account for the scale of change or the sensitivity of the environment in question. The West Lewis coastline is characterised by its unspoiled Atlantic horizon, a largely undeveloped nature, and a profound sense of remoteness. Should large-scale turbines be introduced near the shoreline, their presence would create an overwhelming industrial landscape, irrevocably changing the character of the area and leading to a permanent transformation of the landscape.

Moreover, the application fails to accurately depict the extent of the visual alterations anticipated. The size and proximity of the turbines would dominate vistas from residential locales, historic sites, and popular coastal areas, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of these impacts within the context of such a sensitive environment.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence suggests that certain viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This risk implies that the visual impact may have been understated, casting doubt on the reliability of the assessment.

Another notable shortcoming is the lack of an evaluation of the interconnected nature of landscape, seascape, and cultural heritage. Key sites, including the Calanais Standing Stones and other Scheduled Monuments, are intrinsically linked to their wider landscape through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape would disrupt these connections, thereby altering how heritage assets are perceived and diminishing their ties to the natural horizon. This signifies not just a visual concern, but a broader cultural and spatial detriment that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 regarding the protection of natural environments and historic assets. The anticipated changes contradict the imperative to preserve landscape character, visual amenity, and the contextual integrity of culturally significant sites. The failure to conduct a comprehensive worst-case assessment further undermines any assertion of policy compliance.

Additionally, it is evident that the identified impacts cannot be adequately mitigated. Given the scale, height, and proximity of the turbines, their presence would be both prominent and inescapable. The resulting transformation is consequently fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment does not accurately reflect the magnitude of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is significantly lacking in detail, which is essential for evaluating potential environmental effects. The planned activities include extensive seabed preparation and installation works in a challenging high-energy Atlantic environment. However, the application does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be developed after consent is granted, hindering any meaningful assessment of their adequacy or effectiveness.

The lack of defined future measures is especially troubling in light of the sensitivity of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and critical habitats that are susceptible to both sediment disturbance and contamination. While the application acknowledges risks related to sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate details on how these issues will be prevented, controlled, or monitored.

Moreover, there remains uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also affects potential consequences for marine species and habitats that have already been identified as sensitive within the broader assessment.

The lack of specific emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether appropriate measures are in place to manage pollution incidents. This deferral introduces procedural risks and undermines the ability of the competent authority to assess the necessary environmental protection measures at the time of decision-making.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent, and without this information, a lawful determination cannot be made. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts culminate in an

assessment that is materially deficient. These deficiencies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal fails to provide a thorough evaluation of the ecological and socio-economic impacts on fisheries and marine life, despite the waters off the West Lewis coast hosting both a vibrant marine ecosystem and a significant fishing industry. The application does not convincingly demonstrate how these critical uses and habitats will be preserved without substantial disruption.

A major concern is the assumption that fishing activity can be relocated without consequences. There is no evidence presented that alternative fishing grounds are available, accessible, or suitable to accommodate increased pressure. This lack of information is critical, as such displacement poses a risk of overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, understanding the implications for fisheries and local livelihoods becomes impossible.

The application also introduces considerable risks to marine species due to the anticipated underwater noise from construction activities. The use of high-energy hammer piling over an extended timeframe is expected to cause disturbances that reach large distances, thereby impacting species like dolphins. Concerns arise from the predicted disturbance to a significant portion of the local bottlenose dolphin population, yet the application diminishes the importance of these effects and does so without adequate supporting evidence.

There exists a notable contradiction within the application, where the need for licenses to permit harm to European Protected Species is recognised while simultaneously describing the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises significant concerns regarding adherence to the Habitats Regulations, especially when harm is anticipated at a level that necessitates legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these collective effects is essential, as it directly influences our ability to gauge the overall impact on marine ecosystems and socio-economic conditions.

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

In conclusion, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a proper evaluation of the effects 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 West Lewis coastline is notable for its exceptionally dark skies, which play a crucial role in the environmental quality, cultural identity, and tourism value of the area. However, the proposal introduces permanent red aviation lighting that would be visible over extensive distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally disrupt the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the area's identity and the emerging sector of astro-tourism, this omission is particularly concerning and highlights a clear gap in the overall landscape and environmental assessment.

Moreover, the application does not evaluate the effects of artificial lighting on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species are vulnerable to disorientation caused by phototaxis, which can increase their risk of collision. The absence of any lighting impact assessment or phototaxis study means that the proposal neglects to consider how aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data within the ornithological assessment exacerbates this issue, as it fails to capture nocturnal activity and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding the potential ecological impacts.

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

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

In summary, the complete lack of assessment regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The deficiencies in baseline data,

impact modelling, and species-specific analysis render the application incomplete and unable to support a lawful determination.

TOURISM

The application acknowledges that 86% of visitors are attracted by the area's scenery. However, it does not quantify how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution from tourism. The assessment of tourism impacts is inadequate and overlooks the economic and social consequences for a vital sector of the Isle of Lewis economy.

Tourism has seen significant growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and comprising up to 16% of the island's economy. Despite this growth, 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 broader economic resilience of the area. Without this analysis, it remains unclear whether the proposed development would bring a net economic benefit or harm an established and expanding sector.

The assessment neglects to evaluate the critical role of environmental quality in sustaining tourism, including the value of unspoiled landscapes and dark skies to the visitor experience and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the impact on a recognised and growing part of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show net benefit. It contradicts strategic objectives that identify tourism as a key growth sector and lacks sufficient evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the failure to quantify the impacts on tourism, evaluate environmental factors influencing visitor behaviour, and consider the island's economic reliance leads to a significant evidential gap. This results in an incomplete application and hinders a thorough evaluation of the economic effects.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development when evaluated against statutory

duties, national policy, and evidential standards. This proposal brings forth the same core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. It is now presented under an enhanced policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidence provided for determination. The application lacks a complete baseline data set, utilises an undefined design envelope, and depends on unspecified mitigation measures. Key impact pathways, such as nocturnal wildlife, full onshore infrastructure, and tourism effects, are omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects and residual impacts.

Moreover, procedural shortcomings are evident. The failure to conduct a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment constitutes a material omission. These deficiencies impede the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Conflicts with the National Planning Framework 4 are apparent in the proposal. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Health and wellbeing impacts are not shown to be acceptable, and the absence of tourism impact modelling precludes any evidence of a net economic benefit. The cumulative impact of both offshore and onshore elements has not been assessed properly, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

There are uncertainties surrounding environmental risks that could prove significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and impeding a lawful conclusion on the acceptability of impacts.

The proposal would lead to considerable and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and impacts on tourism would yield permanent consequences that cannot be mitigated to an acceptable standard.

In summary, the application is procedurally and substantively inadequate for determination. The vast information deficiencies, combined with 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 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.

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: AE8C9B71

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.

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured, reasoned comparison of realistic alternatives based on environmental effects. This approach is materially inadequate and does not meet the statutory requirements of the Environmental Impact Assessment regime. Consequently, it fails to demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is a significant lack of transparent or evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered positioning turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical importance of proximity to shore in determining impact highlight that the absence of such an analysis obstructs any conclusion about whether the proposed siting is the least damaging option available.

Deficiencies are evident in the assessment of cable routing and landfall, as well, where insufficient evidence indicates that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been implemented, resulting in an overreliance on post-design mitigation measures.

As a result of these shortcomings, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy inhibits the competent authority's ability to ascertain whether there are less harmful and more appropriate alternatives. Without a comprehensive assessment of alternatives, the proposal cannot be deemed a sustainable or policy-compliant solution.

From a policy perspective, these inadequacies jeopardise compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission that significantly contributes to the conclusion that the application has not been adequately assessed, preventing lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage along the West Lewis coastline is a vital aspect of community identity, yet the assessment of this development disregards it as a dynamic cultural landscape, merging environment, language, tradition, and community. Instead, it treats heritage as mere static assets, neglecting their significant social, cultural, and spiritual roles within the community.

There is a notable shortfall in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are characterised. These sites are active burial grounds

and places of spiritual significance, but the assessment simplistically categorises them as unchanging features. This failure to recognise their ongoing use and meaning, along with the potential impact of the development on their surroundings, leads to an incomplete understanding of the cultural ramifications and overlooks their significance in community life.

Moreover, the assessment neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely omitted from the evaluation, representing a serious oversight. Understanding the cultural impact of the development is impossible without these considerations.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity, with characteristics that align with those of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established participatory principles in decisions impacting cultural and environmental interests.

A significant procedural oversight is the non-compliance with the statutory requirement for an Island Communities Impact Assessment under the Islands (Scotland) Act 2018. The absence of this assessment obstructs the competent authority's ability to legally assess the social, cultural, and economic implications for the island community. This omission alone invalidates the determination process.

From a policy standpoint, these inadequacies put the proposal in direct opposition to National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect of both tangible and intangible heritage, alongside the disregard for living cultural practices, signifies a clear departure from policy standards.

In summary, the failure to adequately consider living heritage, intangible cultural values, community rights, and statutory requirements results in a considerable evidential gap. The cultural implications of the development remain unassessed, and the application does not furnish a robust foundation for understanding the genuine cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment related to seascape, landscape, and visual impacts is insufficient and does not capture the true scale of change or the vulnerability of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create a persistent industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately conveys the extent of this visual alteration.

The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal spots. This would negatively affect visual amenity and detract from the essential qualities of naturalness and remoteness. The assessment does not accurately depict this level of impact or its significance within such a delicate landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. There is evidence that these viewpoints do not fully capture the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This creates a risk that the visual impact's magnitude has been downplayed, compromising the assessment's reliability.

Another shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as separate entities, failing to acknowledge their interdependence and resulting in an incomplete analysis of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is at odds with the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertions of policy compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism, particularly in relation to emerging sectors like astro-tourism. The

introduction of permanent red aviation lighting, visible over long distances, would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application does not address 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, this absence represents a serious gap in the overall landscape and environmental evaluation. Moreover, there is no analysis of the potential 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 their sensitivity to phototaxis, which can cause disorientation and increase the risk of collisions. The lack of any lighting impact assessment or phototaxis study means that potential effects on these species remain unexamined.

This situation is further exacerbated by reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding ecological impacts, making it impossible to ascertain whether protected species or designated sites might face adverse effects. The evidential standard required to exclude these potential adverse effects cannot be met, thereby engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which emphasizes the protection of natural areas and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the ecological framework. Collectively, the absence of assessments related to dark skies and nocturnal wildlife creates a significant evidential gap, resulting in an incomplete application that cannot support a lawful determination.

TOURISM

The application does not adequately assess the impacts of tourism, which is a crucial sector for the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Notably, 86% of visitors are attracted by the scenery, yet there is no quantified evaluation of how large-scale offshore infrastructure could potentially alter visitor numbers, their behaviour, or the overall economic contribution of tourism.

The tourism sector has seen substantial growth, with its value rising from £65 million in 2017 to over £81.5 million. This growth supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application fails to model the impact that the industrialisation of the seascape and the consequent loss of environmental quality would have on Tourism Gross Value Added and the wider economic resilience. Without this critical analysis, it remains unclear whether the

development would provide a net economic benefit or harm an established and expanding sector.

Furthermore, the assessment neglects to consider how environmental quality underpins tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experience and emerging sectors like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the impacts on this increasingly important part of the local economy.

In an island community that has limited economic diversification, the lack of an assessment of tourism impacts bears wider implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, contrary to requirements set out under the Islands (Scotland) Act 2018.

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

Collectively, these deficiencies in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and considering the island's economic dependency create a substantial evidential gap. This situation hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

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

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

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

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

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

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

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

Additional Comments

I am not from Lewis but I've been a regular visitor for a long time. The west coast is stunning and can be described as one of the few places in the Highlands and Islands which has remain unspoiled and I, like many others, wish it to remain so. One of the wonderful things about the area is its darkness. At night one can look to the skies and, I polluted by daylight, see the heavens. There are so few places left in the world where man's interference hasn't changed how we can view our environment. This development, a development which does not provide power for the local community,

which will not benefit the local community, but rather benefit the population of cities far from Lewis by providing them with cheaper electricity than people in Lewis pay, will destroy the darkness. It will destroy the seabed, the beautiful view of the ocean will be gone, and gone for ever.

The influx of workforce will change the culture of the area forever. I was brought up near Nigg and the Invergordon smelter. The arriving workforce changed the area significant and culturally, much was lost - language change, dialectal use of language diminished, accents changed... this many people arriving in such a rural area will change it irreparably.

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: D79A4295

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and robust cultural identity. The scale and design of this proposal, along with its proximity to the shoreline, give rise to significant concerns regarding its compatibility with statutory requirements and national policy, particularly in relation to sustainable development principles.

A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly evaluated. Consequently, the documentation falls short of providing a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible effects lack robust supporting evidence.

Policy conflicts are evident and substantive. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy discrepancies directly impact the statutory tests necessary for consent and challenge the ability of the competent authority to conclude that the development aligns with policy standards.

The unprecedented scale of the proposal, involving large turbines 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, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary depth and transparency, failing to provide a comprehensive view of the environmental effects related to the proposed development. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces a considerable degree of uncertainty, undermining the integrity of the assessment and obscuring the true environmental impacts from both the public and the relevant authority. As a result, the actual consequences of the development may not align with what has been presented, preventing a clear understanding of its environmental ramifications.

Moreover, the application depends significantly on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Seeking consent based on the promise of addressing environmental harm later is procedurally inappropriate. This approach undermines the core purpose of the Environmental Impact Assessment regime, which mandates that potential significant effects and necessary mitigation should be thoroughly established prior to any determination.

The report is further compromised by substantial evidential deficiencies, including a lack of baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. These gaps lead to uncertainty about the magnitude and significance of impacts, particularly when claims of negligible or non-significant effects are made without adequate supporting data. The insufficiency of information impedes a thorough understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that is incompatible with statutory obligations.

Consequently, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation necessitates the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly evaluated or that adequate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough assessment of alternatives, failing to meet the requirements set by the Environmental Impact Assessment regime. Instead of offering a clear and reasoned comparison of realistic alternatives based on their environmental impacts, it provides a narrative of the project's development. This method does not show that less harmful options have been adequately considered, evaluated, and

chosen over more damaging ones.

There is no clear or evidence-based evaluation of different offshore locations, development scales, or design configurations. Notably, the developer has not shown that they have seriously contemplated placing turbines further offshore, where impacts on visual, ecological, and coastal aspects would likely be lessened. Given the sensitivity of the West Lewis coastline, the significance of proximity to the shore in assessing impacts means that the lack of such analysis makes it impossible to conclude that the proposed siting is the least damaging option available.

The shortcomings also relate to cable routing and landfall assessment. There is insufficient evidence to suggest that alternative routes have been adequately investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The failure to establish a clear avoidance strategy and the absence of comparative analysis show that mitigation by design has not been employed, with an over-reliance on measures taken after design completion.

Consequently, the application does not prove that environmental harm has been minimised through decisions about site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy and inhibits the competent authority from determining whether more suitable and less harmful alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is sustainable or in compliance with policy requirements.

This lack of assessment undermines adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community well-being. The failure to provide a structured and comparative assessment is a significant oversight that contributes to the conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is inadequate, resulting in an unreliable understanding of the ecological receptors present. This coastal area is known for its sensitivity and biological activity; however, the baseline data provided is incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, or habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A significant oversight concerns otters, which are classified as a European Protected Species. The application does not appropriately recognise or assess their active use of coastal zones for foraging and movement. By failing to consider their core foraging range and behavioural patterns, the assessment does not adequately evaluate the potential impacts of construction disturbances, noise, and increased activity, thereby

undermining any conclusions about the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks. The reliance on aerial surveys has introduced notable detection bias, particularly in challenging Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that suggest frequent use of these waters. The omission of this relevant data leads to an incomplete baseline, further undermining the reliability of the conclusions drawn.

These methodological flaws result in conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the requirements outlined in the Environmental Impact Assessment regime and the National Planning Framework 4. The assessment has not properly identified or evaluated protected species, leading to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt. As such, the precautionary principle is engaged, making it unlawful to grant consent in these circumstances.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposal involves the development of turbines within a designated migratory corridor on the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment does not adequately demonstrate, to the required evidential standard, that these species will not be adversely affected. It fails to robustly evaluate critical factors such as displacement, collision risk, or habitat loss associated with the proposed development, particularly given its location within key foraging areas and migratory pathways.

A fundamental contradiction is evident in the application. While the developer claims there will be no significant adverse effects, it simultaneously puts forth a Habitats Regulations derogation case, which is necessitated only in scenarios where significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that its conclusions lack proper support from the underlying evidence. The assessment inadequately addresses the potential effects on

seabirds linked to protected sites such as the Lewis Peatlands and St Kilda, failing to fully account for the significance of these feeding grounds. The reliance on modelling approaches introduces a layer of uncertainty, particularly for species that are already experiencing severe declines, like Kittiwakes and Fulmars. Consequently, the methodologies used may underestimate mortality rates, especially in light of incomplete baseline data and a lack of understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor introduces significant risks, effectively obstructing a primary flight path that species utilise when travelling between the United Kingdom and Iceland. The assessment does not sufficiently analyse the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. Regulatory concerns arise from the application's failure to meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the assessment has not satisfied the standard of beyond reasonable scientific doubt. This scenario invokes the precautionary principle, which hampers the ability to reach a lawful conclusion in favour of granting consent.

The identified deficiencies also suggest a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected 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 evidence. Such flaws hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for a positive determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Additionally, the assessment overlooks intangible cultural heritage, including the Gaelic language and local traditions, which are integral to the area's identity. The

absence of these elements signifies a critical omission, as understanding the cultural impact of the development requires consideration of these intangible factors.

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

Furthermore, there is a significant procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately evaluate the social, cultural, and economic implications for the island community, rendering a lawful determination unachievable.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The overall evaluation of social impacts, health, and wellbeing associated with the proposed development is insufficient and lacks the necessary transparency for a lawful assessment. Although the developer engaged local residents through a Social Impact Assessment and conducted focus groups, the complete report remains unpublished. This omission creates a significant gap in evidence, hindering both public understanding and the ability of the competent authority to grasp the full extent of social risks identified by the developer's research.

Available summaries reveal that local residents are experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct engagement and should not be regarded as speculative. However, without access to the complete assessment, proper scrutiny of these findings is impeded, limiting the capacity to ascertain their relevance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings indicating a risk of "cultural loss." Despite this, such impacts have not been adequately incorporated into

the main application or given the attention they warrant. The failure to disclose the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A thorough understanding of social, economic, and health consequences is vital for developments of this magnitude, particularly when community character and functionality may be at stake. The application's inability to present the full dataset results in an incomplete evidential basis for weighing benefits against potential harm.

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

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

In conclusion, the non-disclosure of the full Social Impact Assessment, along with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and supports the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a dominant industrial presence, fundamentally transforming this character and causing a permanent alteration to the landscape. The assessment presented fails to represent the scale of this visual change adequately, as the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, adversely impacting visual amenity and eroding the naturalness and remoteness of the area.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not effectively capture the most sensitive receptors or potential worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, thereby undermining the assessment's reliability.

Moreover, the relationship between landscape, seascape, and cultural heritage has not been sufficiently explored. Notably, sites such as the Calanais Standing Stones and

other Scheduled Monuments are integral to a broader landscape context, which is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated assets, the assessment neglects their interdependence, leading to an incomplete evaluation of their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connections to the natural horizon. This not only represents a visual impact but also inflicts broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change threatens the safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a rigorous worst-case assessment calls into question any claims of policy compliance.

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

Overall, the assessment is inadequate in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns due to the incomplete assessment of construction and pollution risks, which lacks the necessary detail to evaluate the potential environmental effects. The extensive seabed preparation and installation works within the high-energy Atlantic environment are not accompanied by fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be devised after consent is granted, hindering any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures is particularly alarming, considering the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it falls short of providing adequate detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling

and clearly defined management strategies means that it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats, which 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 to a post-consent phase, the application obstructs the assessment of whether suitable safeguards are in place to handle pollution incidents. This situation introduces procedural risks and diminishes the competent authority's ability to evaluate environmental protection measures effectively at the point of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are assessed prior to consent; without this information, a lawful determination cannot be achieved. The application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty regarding potential impacts render the assessment materially deficient. These shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast support a diverse marine ecosystem and an active fishing industry. However, the application presents an assessment of fisheries and marine life that is insufficient, failing to provide a robust evaluation of ecological or socio-economic impacts. A significant concern arises from the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This omission is critical, as displacement could lead to overfishing in other areas and may result in wider economic repercussions for the local fleet. Consequently, without a clear and evidence-based assessment, the impacts on fisheries and livelihoods remain inadequately understood.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling, expected to occur over an extended duration, is likely to disturb marine life across considerable distances, notably impacting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns; yet the application diminishes the significance of these effects, lacking sufficient supporting evidence.

Inconsistencies within the application further exacerbate the situation. While it acknowledges the need for licences to permit harm to European Protected Species, it

simultaneously describes the anticipated impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that requires legal authorisation.

The assessment also neglects to address cumulative impacts resulting from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Absent a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, the application fails to demonstrate compliance 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 that it will avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns regarding carbon balance. Disturbance of peatland areas releases stored carbon, which could create a carbon debt that undermines the aims of renewable energy development. The application fails to adequately tackle this issue or prove that the overall carbon balance remains positive.

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

The assessment of onshore infrastructure is materially incomplete, neglecting the full extent of impacts stemming from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically linked but are evaluated separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects. The onshore components include cabling across protected moorland, construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These works involve excavation across areas of deep peat, particularly within Barvas Moor, which is a critical carbon store and ecologically sensitive habitat. The application does not deliver a thorough assessment of these impacts, thus preventing a complete understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application obstructs proper evaluation of cumulative effects. The Environmental Impact Assessment

process necessitates that all elements of a project are considered collectively, yet the separation of offshore and onshore components means that the combined impacts on peatlands, habitats, and communities are not fully grasped.

There are notable risks to sensitive habitats, including machair systems and peatland environments that are subject to policy protection. The application does not show that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented. This signifies a clear evidential gap in the context of biodiversity protection.

From a policy standpoint, the failure to assess the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the reliability of the application. Collectively, the separation of project components, the lack of comprehensive assessment, and the absence of evidence regarding environmental and land use impacts make this aspect of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive “wall of light” effect along the western horizon. This change would significantly alter the night-time environment, yet the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the crucial role of dark skies in the local identity and the emerging tourism sectors, such as astro-tourism, this omission represents a significant gap in the overall landscape and environmental assessment.

Furthermore, there has been no consideration of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The application lacks a lighting impact assessment or a phototaxis study, failing to address how the proposed aviation lighting might affect these species or lead to increased mortality.

The reliance on daytime survey data within the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this vulnerability has also gone unassessed. The absence of site-specific night-time data creates a critical void in understanding the ecological impacts of the proposal.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether

protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thereby engaging the precautionary principle and hindering a lawful determination.

From a policy perspective, the omissions present in the application contradict National Planning Framework 4, particularly regarding the protection of natural places and environmental quality. This lack of consideration also undermines the broader evaluation of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall ecosystem.

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 incapable of supporting a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm embodies a significant failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. This current proposal is now presented under a policy framework that should place even greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are considerable gaps in the baseline data provided, alongside the use of an undefined design envelope and reliance on unspecified mitigation measures. Important impact pathways have been omitted, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is deficient and does not allow for a comprehensive understanding of likely significant effects or residual impacts.

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

In terms of compliance with National Planning Framework 4, the proposal is fundamentally at odds with requirements. It does not adequately protect biodiversity, natural places, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore components have not been sufficiently assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties remain around environmental risks, which could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful determination that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority is urged to refuse consent for this application or to invoke relevant regulatory provisions to compel the submission of the necessary information.

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

Additional Comments

I was raised in the Scottish Highlands, a place that has a deep significance for me. Beyond this personal connection, the Highlands and Islands represent one of the most distinctive and valued landscapes in Scotland and the wider United Kingdom, recognised for their exceptional natural beauty, cultural heritage, and ecological importance.

The Highlands and Islands are widely regarded as an area of outstanding natural value and beauty supporting some of the most important and sensitive wildlife species in the UK. These landscapes and marine areas provide vital habitats that are increasingly rare and fragile.

There is a clear responsibility to safeguard the physical environment and the biodiversity it supports, particularly in areas that have remained largely undeveloped and retain a strong sense of wildness and remoteness, such as The Highlands and Islands!

One of my primary concerns is the industrial impact on what is currently a predominantly rural and natural landscape. The Highlands & Islands are defined by their open, undeveloped character, and many people choose to visit, live and relocate to the area specifically because of this quality. The introduction of large-scale wind turbines, associated infrastructure, and the access required would fundamentally alter the area, replacing a sense of natural openness with industrial elements that are out of scale with their surroundings.

Once landscapes are altered, they cannot be restored to their original condition. The loss of undeveloped rural areas is irreversible, and this proposal would contribute to a gradual but permanent erosion of distinctive character. The impact on the landscape would be unacceptable. The construction phase alone would require extensive works, access and installation activity, all of which would cause significant disruption to the land, local communities, wildlife habitats and marine activity. Over 25% of the world's whale and dolphin species can be seen around Scottish Islands, particularly the Hebrides!

These impacts would not be short-term but long-lasting changes to the environment and those who live in local communities. For these reasons, I strongly believe that the proposed development would result in substantial and unjustified harm to the landscape, heritage, and ecological value and these strongly outweigh any results.

These impacts must be given significant weight in the decision-making process, and every effort should be made to protect this irreplaceable environment for current and future generations.

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: BE510FB5

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 proposal for the development is underpinned by an Environmental Impact Assessment Report that is fundamentally flawed, failing to deliver a full, transparent, or reliable account of the potential environmental impacts. The introduction of a flexible Project Design Envelope, which lacks defined turbine dimensions, layouts, or

configurations, leads to considerable uncertainty. This ambiguity hampers the ability to apply a consistent worst-case scenario, thereby compromising the integrity of the assessment and obscuring the true environmental effects. Consequently, both the public and the competent authority are left without a clear understanding of the possible impacts from the development ultimately constructed.

Furthermore, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent on the basis that environmental harm will be mitigated later undermines the potential for a meaningful evaluation of effectiveness and leaves residual impacts unassessed. This deferment of essential information to post-consent phases is procedurally improper and contradicts the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures must be clearly established prior to any determination.

There are substantial evidential shortcomings within the assessment, including gaps in baseline data and methodological limitations. The reliance on assumptions rather than site-specific evidence leads to uncertainty regarding the extent and significance of impacts. This is particularly concerning when conclusions regarding negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information inhibits a thorough understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential standards outlined in the Habitats Regulations necessary to rule out adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially in relation to protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that adequate safeguards are in place.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the existing gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of the environmental effects, leaving the competent authority unable to make an informed determination based on the information currently available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is critically flawed and fails to provide a comprehensive or reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data presented is insufficient, and the methodologies employed do not adequately identify species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation

necessary for evaluating potential impacts.

A significant shortcoming pertains to otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that the potential impacts of construction activities, noise, and increased human presence have not been thoroughly assessed. This oversight compromises any assertions regarding the absence of significant effects on this species.

Further issues arise in the evaluation of basking sharks, where reliance on aerial surveys introduces considerable detection bias, especially in Atlantic conditions. This approach is prone to underestimating the presence of these sharks, particularly when compared to established land-based observations that demonstrate frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline and undermines the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than on robust evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an inadequate identification and assessment of protected species. The uncertainty created by these deficiencies inhibits the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, the grant of consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and lacks the rigorous evidence needed to support its conclusions. It overlooks the critical fact that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. The application fails to provide adequate assurance that these species will not be adversely affected, particularly given that the development is situated within vital foraging areas and migratory pathways. The assessment does not thoroughly consider the risks of displacement, collision, or habitat loss that may arise from the project.

Moreover, there is a glaring contradiction in the application, as the developer asserts that no significant adverse effects will occur while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the credibility of the assessment and raises doubts about the validity of its findings. The evidence presented does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical feeding grounds for these birds are not adequately evaluated, and the reliance on modelling raises significant uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially where baseline data is lacking and the behavioural responses of the species are not fully understood.

The placement of turbines within a recognised migratory corridor presents an additional risk by creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of sustained mortality within this corridor or the potential impact on species with limited global populations. From a regulatory standpoint, the application does not meet the necessary evidential standards to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data gaps, and limitations in modelling all contribute to a failure to achieve the standard of beyond reasonable scientific doubt. This situation engages the precautionary principle and undermines the legal basis for granting consent.

In addition, the identified deficiencies demonstrate non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not suffer adverse effects places this proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. Such shortcomings impede a thorough evaluation of potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impact assessment associated with the development is significantly lacking in transparency, making it impossible to conduct a lawful evaluation. Although the developer conducted a Social Impact Assessment and engaged with local residents through focus groups, the full report has not been made available. This creates a major evidential gap, which hampers both public understanding and the competent authority's ability to gauge the social risks outlined by the developer's research.

Residents are reportedly experiencing stress, anxiety, and concern due to the scale and proximity of the proposal, based on direct engagement rather than speculation. However, the absence of the complete assessment restricts the ability to scrutinise

these findings fully and diminishes their significance in the decision-making process.

Moreover, there are indications that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been adequately incorporated into the main application or given the necessary consideration. The lack of transparency regarding the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This deficiency compromises the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application cannot provide a thorough evidential basis for assessing the trade-offs between benefits and detriments.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence available points to current adverse effects that have not been fully disclosed. Therefore, without the complete assessment, it is impossible to demonstrate compliance with this policy.

The implications of this situation are considerable. The competent authority cannot perform a comprehensive socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential standards set by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly inadequate. It does not capture the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, a lack of development, and a strong sense of remoteness. Introducing large turbines near the shoreline would create a continuous industrial presence, which would fundamentally change this character and lead to a permanent transformation of the landscape.

The application does not effectively convey the magnitude of the visual changes expected. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly affect visual amenity and diminish the naturalness and sense of remoteness that the area currently possesses. The assessment fails to articulate this impact or its

importance within such a sensitive landscape.

Methodological issues also arise concerning how visual viewpoints have been selected and presented. It appears that these viewpoints do not fully reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and valued landscapes. This oversight raises the possibility that the visual impact has been underestimated, thereby reducing the reliability of the assessment.

Moreover, there is a notable 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 linked visually and spatially to the Atlantic horizon. The assessment treats these as isolated features rather than recognising their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and diminishing their relationship with the natural horizon. This represents not only a visual effect but also broader cultural and spatial harm that the application has not adequately addressed.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The level of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario further weakens claims of policy adherence.

Additionally, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be prominent and unavoidable. The resultant change is therefore fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation.

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interrelatedness of landscape and heritage. These shortcomings hinder a reliable evaluation and strengthen the argument 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, rendering it materially incomplete. There is an absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans, which is particularly troubling given the high-energy Atlantic environment where substantial seabed preparation and installation works are planned. Instead, the application opts to rely on vague mitigation and contingency measures that are set to be determined after consent is granted, making it impossible to evaluate their sufficiency or effectiveness prior to that point.

The implications of this approach raise serious concerns due to the sensitivity of the West Lewis coastline, which is known for its clean coastal waters and vital habitats. These habitats are susceptible to disturbance from sediment and contamination, yet the application fails to provide adequate detail on preventing, controlling, or monitoring risks such as sediment mobilisation and potential chemical or oil spills.

Moreover, there is considerable uncertainty about the behaviour and scale of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and well-defined management strategies means it is impossible to ascertain the ecological effects or duration of these impacts. This uncertainty extends to identified marine species and habitats that are already deemed sensitive within the wider assessment framework.

The deficiencies are further exacerbated by the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the proposal undermines the ability to evaluate whether sufficient safeguards are established to address potential pollution events. This procedural risk complicates the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards goes against the principles of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be thoroughly assessed before consent, and the absence of this information renders a lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the overall inadequacy of defined mitigation measures, coupled with the lack of detailed management plans and the uncertainty surrounding potential impacts, leads to the conclusion that the assessment is fundamentally flawed. These issues hinder a rigorous evaluation of the construction and pollution risks associated with the proposal.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application under review presents an inadequate assessment of fisheries and marine life. It does not deliver a robust evaluation of either ecological or socio-economic impacts. A significant concern is the assumption that fishing activity can be displaced without consequences. The application lacks evidence supporting the availability, accessibility, or capability of alternative fishing grounds to handle additional pressure. This oversight is critical as it poses risks of overfishing in other areas and may lead to wider economic repercussions for the local fishing fleet. Without a thorough, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal raises considerable risks for marine species due to

underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended duration is likely to cause disturbances across large distances, significantly affecting species such as dolphins. The application suggests a likely disturbance to a considerable portion of the local bottlenose dolphin population, yet this is downplayed without adequate supporting evidence, which raises serious concerns.

There exists a notable inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is recognised, while impacts are concurrently described as negligible. This contradiction undermines the credibility of the assessment and calls into question compliance with the Habitats Regulations, especially where harm is anticipated to a level necessitating legal authorisation.

Additionally, the assessment fails to account for cumulative impacts stemming from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed excessively industrial. Presenting this application within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify the underlying deficiencies.

The evidential basis for the proposal is incomplete and unreliable. Critical gaps in baseline data are evident, as is the continued utilisation of an undefined design envelope. Furthermore, the reliance on unspecified mitigation measures and the omission of significant impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, contribute to an Environmental Impact Assessment that is fundamentally inadequate. This lack of thoroughness hinders a comprehensive understanding of the likely significant effects or residual impacts.

Procedural failures are also apparent. The absence of a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, while the failure to fully disclose the Social Impact Assessment constitutes a significant omission. Such deficiencies inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal is at odds with National Planning Framework 4. It does not adequately demonstrate protection of biodiversity, natural environments, or cultural heritage. The health and wellbeing impacts have not been shown to be acceptable, and there is a lack of evidence regarding net economic benefits, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project are uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals reveal inconsistencies. The evidential threshold required to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been satisfied, thereby engaging the precautionary principle and inhibiting lawful conclusions regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The numerous information deficiencies, compounded by conflicts with policy and unresolved environmental risks, prevent a lawful, evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the appropriate regulatory provisions to require the submission of the necessary missing information.

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

Additional Comments

Stop trying to destroy our Island!!

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: BB4BEA85

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, lacking a complete, transparent, and dependable account of the likely environmental effects associated with the proposed development. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This approach undermines the reliability of the assessment and leads to the potential misrepresentation of the impacts, as it prevents both the public and the competent authority from comprehending the true extent of environmental effects.

Consent is sought on the assumption that environmental harm will be mitigated through undefined measures and management plans in the future. This reliance on yet-to-be-determined strategies obstructs any meaningful evaluation of their effectiveness and the assessment of residual impacts. Such deferral of essential information to the stages following consent is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which demands that likely significant effects and mitigation are clearly established prior to determination.

Moreover, the application exhibits significant evidential shortcomings, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings contribute to uncertainty surrounding the scale and significance of impacts, especially when negligible or non-significant effects are suggested without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application fails to satisfy the evidential threshold outlined in the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully assessed or that suitable safeguards exist.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These inadequacies obstruct a lawful and rigorous assessment of environmental effects, meaning that the competent authority cannot justifiably determine the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned comparison of realistic alternatives in accordance with the statutory requirements of the Environmental Impact Assessment regime. Instead of a thorough assessment based on environmental effects, it offers a narrative of project evolution. This method does not adequately demonstrate that less harmful options have been identified, assessed, and preferred over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has seriously explored the possibility of siting turbines further offshore, where the impacts on visual aesthetics, ecology, and the coastal environment would likely be diminished. Considering the sensitivity of the West Lewis coastline and the critical importance of proximity to shore for assessing impacts, the lack of such analysis precludes any assertion that the proposed siting is the least damaging option available.

The shortcomings are evident in the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately considered to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and the failure to conduct comparative analysis indicate a neglect of mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more appropriate alternatives may exist. The deficiency in providing a robust alternatives assessment prevents a conclusion that the proposal is sustainable or compliant with policy.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species fails to provide a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the baseline data is incomplete. The methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not offer a sound basis for evaluating impacts.

One significant omission involves otters, a European Protected Species. The application does not appropriately recognise or assess their use of coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity are not properly assessed. This lack of assessment undermines any conclusions about the absence of significant effects on this species.

Additionally, there are deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This likely leads to an underestimation of their presence when compared to established land-based observations that show frequent use of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological limitations mean that any conclusions regarding 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 variation and broader ecosystem interactions. This generates uncertainty about the true scale of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant deficiencies regarding the ornithological assessment, raising serious concerns about its reliability. Key evidence gaps and internal inconsistencies challenge the conclusions drawn, particularly given the presence of internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing decline. The proposal does not adequately demonstrate that these species will not face adverse impacts, despite their crucial presence in key foraging areas and migratory pathways. The assessment fails to thoroughly evaluate critical aspects such as displacement, collision risk, and habitat loss.

Furthermore, a fundamental contradiction within the application arises from the developer's assertion of no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency undermines the assessment's reliability and suggests that the findings are not substantiated by the evidence provided. Specifically, the assessment lacks 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 comprehensively addressed, and the modelling techniques employed add an element of uncertainty, particularly concerning species such as Kittiwakes and Fulmars that are already in severe decline. The methodologies used appear likely to

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

The siting of turbines within a designated migratory corridor further elevates the associated risks, creating a barrier in a primary flight path that is utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term repercussions of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standard necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation activates the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

In addition, the identified deficiencies signify a lack of compliance with the National Planning Framework 4 concerning the protection of biodiversity and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted directly contravenes national policy.

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and lack of robust evidence. These inadequacies hinder a thorough evaluation of potential impacts and collectively support the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage along the West Lewis coastline is fundamentally flawed, failing to recognise this area as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic view of heritage, treating it as a collection of isolated, static assets instead of acknowledging their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming of the assessment is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not just static features; they serve as active places for burial and spiritual practice. The assessment's failure to consider their continued use and the impact of development on their surroundings leads to a limited understanding of cultural effects and neglects their vital role in community life.

Moreover, intangible cultural heritage, including the Gaelic language and local traditions, as well as the community's enduring relationship with the coastal environment, is not adequately addressed. These aspects are fundamental to the area's identity but are completely omitted from the assessment, representing a significant oversight. Without considering these essential factors, the full cultural

impact of the proposed development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies distinct characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The lack of meaningful engagement undermines the credibility of the assessment and does not adhere to established principles of participation for decisions that impact cultural and environmental interests.

A critical procedural lapse is evident in the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the assessment insufficient for lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly regarding the protection of historic assets and sites. The neglect of both tangible and intangible heritage, along with an absence of recognition for living cultural practices, represents a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently evaluated, leaving the application without a proper foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

development.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding seascape, landscape, and visual impacts falls significantly short of accurately capturing the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed large-scale turbines positioned near the shoreline would establish an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application does not sufficiently represent the extent of the visual transformation. Given their size and proximity, the turbines would dominate views from residential areas, historic locations, and popular coastal spots. This would detrimentally affect visual amenity and compromise the defining characteristics of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Concerns also arise from the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not fully reflect the most sensitive receptors or the most adverse scenarios, particularly concerning critical cultural heritage sites and valuable landscapes. This oversight raises the possibility

that the visual impact has been underestimated, thereby undermining the assessment's reliability.

Additionally, there is a notable failure to evaluate the interconnectedness between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones, alongside other Scheduled Monuments, form part of a broader landscape intricately linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as independent entities without acknowledging their interdependence, leading to an incomplete analysis of the impacts on their settings and cultural significance.

The industrialisation of the seascape would sever these vital connections, altering the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This represents not merely a visual concern but a wider cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4 regarding the protection of natural environments and historic assets. The magnitude of change is not compatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case scenario analysis further weakens any assertion of policy compliance.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Due to the turbines' scale, height, and proximity, their presence would be unavoidable and dominant. Consequently, the resulting transformation is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

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

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

mobilisation and potential accidental chemical or oil spills, it does not supply sufficient information on prevention, control, or monitoring strategies.

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

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

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

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

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries presented in the application is inadequate and does not deliver a thorough assessment of the ecological or socio-economic ramifications. The waters located off the West Lewis coast host a vibrant marine ecosystem and an operational fishing industry, yet the application does not sufficiently demonstrate the ability to protect or sustain these habitats and activities without substantial disruption.

A significant concern arises from the assumption that fishing operations can be relocated without repercussions. The application lacks evidence to substantiate the availability, accessibility, or capacity of alternative fishing grounds to accommodate increased pressure. This gap in information is critical, as such displacement could lead to overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

The proposed development also poses considerable risks to marine species,

particularly due to the underwater noise generated during construction. The anticipated use of high-energy hammer piling over an extended duration is likely to disturb marine life over considerable distances, particularly species like dolphins. Concerns regarding the predicted disturbance to a significant portion of the local bottlenose dolphin population are serious; however, the application tends to underestimate these effects and does so without adequate supporting evidence.

There exists a notable inconsistency within the application that acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously declaring these impacts as negligible. This contradiction calls into question the reliability of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment does not adequately address cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is necessary to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In conclusion, the absence of supporting evidence on fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment incomplete and untrustworthy. These shortcomings inhibit a rigorous evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore infrastructure assessment is incomplete and does not consider the full range of impacts associated with this integrated project. The offshore turbines and onshore works are connected, yet they are evaluated separately, leading to a fragmented understanding of the environmental and socio-economic effects.

Onshore elements include cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure in sensitive landscapes. These activities involve excavating 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 hampers understanding of the project's total environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment

process requires all project components to be considered together. The separation of onshore and offshore elements obscures the combined impacts on peatlands, habitats, and local communities.

Significant risks to sensitive habitats, including machair systems and peatland environments, are evident, with these areas receiving policy protection. The application does not adequately demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, highlighting a gap in biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that undermines renewable energy objectives. The application does not sufficiently address this issue or prove that the overall carbon balance is advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence of necessary consents or processes being initiated, creating uncertainties about deliverability and legal compliance.

From a policy standpoint, the failure to assess the project in its entirety and to 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 further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife represents a significant gap within the Environmental Impact Assessment. The exceptional darkness of the West Lewis coastline is a crucial aspect of its 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 an intrusive “wall of light” across the western horizon, fundamentally changing the night-time landscape.

Additionally, the application lacks any evaluation of how this lighting may impact visual amenity, landscape character, or the experiences of both residents and visitors. Given the essential role that dark skies play in the region’s identity and in emerging tourism sectors such as astro-tourism, this failure to address lighting impacts is particularly concerning. The resulting absence in the overall landscape and environmental assessment is marked.

Moreover, the proposal neglects to evaluate its effects on nocturnal wildlife. Species

including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to phototaxis, leading to potential disorientation and heightened risks of collision. The absence of a lighting impact assessment or a phototaxis study means the proposal does not properly consider how aviation lighting could adversely affect these species or contribute to increased mortality rates.

This lack of evaluation is exacerbated by reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal behaviours and the associated risks. Other species, such as Kittiwakes, which may forage or migrate during night hours, are equally susceptible to the disorienting effects of artificial lighting. Without site-specific data collected during night-time hours, there exists a critical gap in understanding the ecological impacts of the proposal.

It is impossible to ascertain whether any protected species or designated sites would suffer adverse effects in the absence of a thorough assessment of nocturnal impacts. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4, which emphasises the protection of natural environments and the maintenance of environmental quality. Furthermore, it diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is vital to the broader ecological context.

In summary, the complete lack of evaluation regarding dark skies and nocturnal wildlife leads to a substantial evidential deficiency. The omission of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of substantiating a lawful decision.

TOURISM

The assessment of tourism impacts is fundamentally inadequate, failing to address the economic and social ramifications for a crucial sector of the Isle of Lewis economy. This sector relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application notes that 86% of visitors are attracted by the scenery; however, it lacks a quantified evaluation of how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. In spite of this growth, the application does not consider how the proposed industrialisation of the seascape and the associated decline in environmental quality would affect Tourism Gross Value Added or broader economic resilience. In the absence of such analysis, it is impossible to ascertain whether the

proposed development would result in a net economic benefit or jeopardise an established and flourishing sector.

Furthermore, the assessment disregards the critical role of environmental quality in promoting tourism. It overlooks the significance of unspoiled landscapes and dark skies in shaping visitor experiences, particularly in relation to burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable void in understanding the impacts on a recognised and expanding segment of the local economy.

In an island community with limited economic diversification, the omission of tourism impact assessments carries broader consequences for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity of demonstrating net benefit. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Overall, the inability to quantify tourism impacts, assess the environmental factors driving visitor behaviours, and acknowledge the island's economic dependencies culminates in a substantial evidential deficiency. This gap hampers a thorough evaluation of the economic consequences, leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm stands as a clear failure to meet the standards of sustainable development, as established by statutory obligations, national policy, and evidential criteria. It mirrors the core 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 submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

A complete and reliable evidential basis for determining this application is lacking. There are significant gaps in baseline data, and the use of an undefined design envelope raises concerns. Additionally, the application relies on unspecified mitigation measures and fails to address critical impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a full understanding of likely significant effects and residual impacts.

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

Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment constitutes a material omission. These shortcomings inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal is in direct opposition to National Planning Framework 4, as it does not adequately protect biodiversity, natural environments, and cultural heritage. It has not demonstrated that health and wellbeing impacts are acceptable, nor can it prove a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

This proposal would also lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and adverse effects on tourism represent permanent changes that cannot be adequately 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, obstruct a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or utilise relevant regulatory provisions to require the submission of the necessary missing information.

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

Additional Comments

I am submitting this objection having considered the proposal and following much reading and discussion looking at both sides, for and against. I have come 100% to the conclusion that the proposed windfarm would be detrimental to the island, negatively impacting the community, the natural environment, wildlife and tourism. The size and scale of the proposed windfarm is horrific and considering it's size is far too near the coastline. With no fixed plan explaining how it would be decommissioned in the future the risk of it being abandoned and left to deteriorate is high. Any reassurances given that this would not be the case seem lacking in substance. Infact the proposal from the beginning has been high handed, driven by profit and with short-sightedness as to the

full impact of the development. Decisions and proposals made by people who will not have to pay the price of the negative impact of such large scale industrialization in their community. Whilst I agree that renewable energy should be pursued I would argue that to do so at any cost as highlighted in all 12 sections of the objection is counter productive. I come into agreement with every section in this objection. Personally as an Airbnb host I know that the attraction for many people to visit the island is it's unspoiled beauty. A beauty which will be scarred if the development were to proceed. Tourism and therefore my income would be negatively impacted as a result.

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: 819DD9B9

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 processes. The objection is based on a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental concerns, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic coastline, largely untouched environment, and strong cultural heritage. The size, location, and design of the project raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a valid decision. It is missing critical environmental data, and the baseline information is both limited and inconsistent. Furthermore, important components of the proposal remain unspecified. The use of a flexible design framework hinders a clear assessment of potential significant effects. Additionally, the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or insignificant effects lack strong supporting evidence.

There are notable and serious policy contradictions. The proposal seems to conflict with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national standards for protecting biodiversity, climate interests, and environmental integrity. These contradictions are critical to the statutory requirements for consent and weaken the competent authority's ability to determine that the development meets policy standards.

The scale of the proposal is unprecedented in this area, with large turbines positioned close to the shoreline, raising significant concerns about the capacity of the landscape, visual impact, and environmental effects. The combination of insufficient information, reliance on undefined mitigation strategies, evidential flaws, and clear policy non-compliance illustrates that the application is incomplete and unable to support a lawful decision. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not offer a transparent or reliable account of the potential environmental effects of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hampers the ability to consistently apply a worst-case scenario, compromising the integrity of the assessment. As a result, the impacts described may not accurately represent the actual development, which hinders both public understanding and the competent authority's evaluation of the true environmental effects.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet clearly defined. Seeking consent on the premise that environmental harm will be mitigated later prevents a thorough evaluation of effectiveness and residual impacts. Deferring essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which requires likely significant effects and mitigation to be established before determination.

There are also substantial evidential gaps, including missing baseline data, limitations in methodology, and 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 asserted without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot meet statutory requirements.

Consequently, the application does not satisfy the evidential standards set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it fails to show that impacts have been fully assessed or that proper safeguards are established.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data results in an unreliable and incomplete Environmental Impact Assessment Report. These issues impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, resulting in a lack of a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system, yet the methodologies employed and the baseline data provided are insufficient to capture the presence, behaviour, and habitat

use of the relevant species. Consequently, the assessment fails to establish a solid evidential basis for evaluating potential impacts.

Notably, there is a significant oversight regarding otters, which are classified as a European Protected Species. The application neglects to adequately acknowledge and evaluate their active utilisation of coastal areas for foraging and movement. The assessment does not consider their core foraging range or behavioural patterns, resulting in an inadequate appraisal of the potential effects stemming from construction disturbance, noise, and increased activity. This lack of analysis undermines any conclusions drawn about the absence of significant effects on the otter population.

The evaluation of basking sharks similarly suffers from methodological shortcomings, particularly due to an overreliance on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This approach is likely to underestimate the presence of basking sharks when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate relevant data further contributes to an incomplete baseline and diminishes the credibility of the conclusions reached.

These methodological deficiencies mean that the assertions of negligible or non-significant effects are predicated more on assumptions than on substantiated evidence. The lack of adequate baseline data also inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. As a result, there remains significant uncertainty about the true scale of risks posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, containing significant gaps in evidence and inconsistencies that undermine its conclusions. This raises serious concerns, particularly given that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in

decline. The application fails to meet the necessary evidential standard to demonstrate that these species will not be adversely affected. It is located within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

Moreover, a critical contradiction is present within the application itself. The developer asserts that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and highlights that the conclusions drawn are not substantiated by the evidence provided. Insufficient evidence is presented regarding the impact on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches injects uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. There is a strong likelihood that the methodologies employed underestimate mortality, especially given that baseline data is lacking and behavioural responses remain poorly understood.

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

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and limitations in the modelling means that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and precludes a lawful conclusion in support of consent. The deficiencies identified also represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and landscape changes presented in the application is fundamentally inadequate. It does not truly capture the scale of transformation nor the sensitivity of the environment affected. The West Lewis coastline, characterised by its expansive Atlantic horizon and an unspoiled, remote character, would face significant alterations with the introduction of large-scale turbines near the shoreline.

This would establish a constant industrial presence, leading to an irreversible and profound change in the landscape.

Moreover, the visual consequences of this proposal have not been accurately portrayed. The turbines, due to their size and closeness to residential areas, historic sites, and popular coastal regions, would dominate views, severely impacting visual amenity and diminishing the area's essential qualities of naturalness and remoteness. The assessment falls short of adequately expressing the significance of this impact in light of the area's sensitivity.

Concerns also arise regarding the methods employed in selecting and displaying visual viewpoints. Evidence indicates that these viewpoints may not represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This situation raises the possibility that the visual impact has been downplayed, thereby undermining the overall reliability of the assessment.

Additionally, there is a notable failure to evaluate the intertwined relationship between landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, are intricately linked to the wider landscape through visual and spatial connections to the Atlantic horizon. The assessment incorrectly treats these sites as isolated entities rather than acknowledging their interrelatedness, resulting in an incomplete understanding of how impacts affect their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not just a visual disruption but a broader cultural and spatial detriment that has not been sufficiently evaluated within the application.

From a policy standpoint, this proposal stands in direct conflict with the National Planning Framework 4, which seeks to protect both natural environments and historic assets. The magnitude of the proposed changes is not compatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment diminishes any assertion of compliance with relevant policy.

It is also evident that the identified impacts cannot be adequately mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelming and inescapable. Consequently, the change introduced by this development is both fundamental and permanent, rather than something that could be lessened to an acceptable degree through mitigation measures.

Overall, the assessment fails to convey the true scale of the impact, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings obstruct a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

There is also a lack of clarity about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty includes potential effects on marine species and habitats that have already been identified as sensitive in broader assessments.

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

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

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

FISHERIES AND MARINE LIFE

The application presents a concerning lack of thorough assessment regarding fisheries and marine life, failing to provide a robust evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast, which support a diverse marine ecosystem and a vital fishing industry, are not adequately considered in terms

of protection or maintenance from significant disruption.

A critical problem lies in the assumption that fishing activities can be displaced without any repercussions. The application offers no evidence supporting the availability or accessibility of alternative fishing grounds that could accommodate additional pressure. This notable omission carries substantial risk, as such displacement could lead to overfishing in other areas and may have far-reaching economic consequences for the local fishing fleet. The lack of a clear, evidence-based assessment obscures a proper understanding of the potential impacts on fisheries and livelihoods.

Moreover, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life across extensive distances, adversely affecting species like dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is alarming; however, the application minimizes the importance of these effects, lacking sufficient supporting evidence.

There exists a troubling inconsistency within the application, wherein the necessity for licences to authorise harm to European Protected Species is acknowledged, while simultaneously stating that the anticipated impacts are negligible. This contradiction severely undermines the credibility of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, especially in cases where anticipated harm would require legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project is fundamentally flawed due to the fragmented evaluation of its components. The offshore turbines and the onshore works are interconnected yet assessed in isolation, which obscures the comprehensive

understanding of their combined environmental and socio-economic impacts. This approach fails to account for the extensive ramifications that arise from what constitutes a single integrated project.

The onshore infrastructure entails significant works, including the installation of cabling across protected moorland and the construction of a substation in proximity to Stornoway. Furthermore, the associated access infrastructure will traverse sensitive landscapes. Notably, the excavation activities will occur in areas of deep peat, particularly within Barvas Moor, a site of considerable ecological sensitivity and a vital carbon store. The application lacks a thorough assessment of these impacts, thus hindering a complete understanding of the overall environmental footprint of the project.

By omitting or postponing the evaluation of onshore impacts, the application obstructs a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates a holistic consideration of all project components, yet the distinct treatment of offshore and onshore elements has resulted in a lack of clarity regarding the cumulative impacts on peatlands, habitats, and local communities.

Moreover, significant risks to sensitive habitats, such as machair systems and peatland environments protected under policy, remain unaddressed in the application. There is insufficient evidence to confirm that the effects on these habitats have been comprehensively evaluated or that effective avoidance measures have been put in place, highlighting a critical gap in biodiversity protection.

Concerns also arise regarding the carbon balance implications of the proposal. The disturbance of peatland can lead to the release of stored carbon, thus potentially creating a carbon debt that undermines the objectives of renewable energy development. The application has not sufficiently tackled this matter or shown that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence in the application indicating that the requisite consents or processes have been initiated, which raises concerns about the feasibility and lawful implementation of the project.

From a policy perspective, the failure to assess the entire project comprehensively, along with the inadequate demonstration of 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 weakens the application.

In summary, the disjunction between project components, the lack of a thorough assessment, and the absence of conclusive evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, precluding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, which constitutes a material omission. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to environmental quality, cultural identity, and tourism value. The proposed development includes the installation of permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment.

Additionally, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly significant given the importance of dark skies to the area's identity and the burgeoning astro-tourism sector. The failure to consider these impacts creates a notable gap in the overall landscape and environmental assessment.

More alarmingly, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application lacks any form of lighting impact assessment or phototaxis study, failing to explore how aviation lighting could affect these species or contribute to increased mortality.

This omission is further exacerbated by an overreliance on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or related risks. For instance, Kittiwakes, which may forage or migrate at night, are susceptible to disorientation from artificial lighting, yet this risk has been ignored. The absence of site-specific night-time data presents a significant gap in the understanding of ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The required evidential standard to exclude adverse impacts beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, it diminishes the broader evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment.

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

TOURISM

The assessment concerning the impacts on tourism is inadequate and does not fully consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantitative evaluation of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and making up to 16% of the island's economy. However, the application fails to model the potential impacts that the industrialisation of the seascape and a decline in environmental quality may have on Tourism Gross Value Added and the broader economic resilience of the area. In the absence of such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or potentially harm an established and expanding sector.

Moreover, the assessment neglects to address the critical role that environmental quality plays in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and fostering emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a considerable gap in understanding the impacts on a recognised and growing segment of the local economy.

Given the context of an island community with limited economic diversification, the failure to assess the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated in accordance with the Islands (Scotland) Act 2018.

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

In summary, the combined shortcomings in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and recognising the island's economic dependency result in a significant evidential gap. This limits the ability to conduct a thorough evaluation of the economic effects and supports the conclusion that the application is lacking in completeness.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the essential requirements for sustainable development when evaluated against statutory obligations, national policy, and necessary evidential standards. This proposal mirrors

the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being presented under a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant shortcomings in the evidential basis for this proposal. It lacks complete and reliable baseline data, relies on an ambiguous design envelope, and depends on unspecified mitigation measures. Furthermore, it omits critical impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is insufficient and fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment constitutes 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 unfit for determination.

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

Environmental risks remain uncertain and may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been fulfilled, necessitating the application of the precautionary principle and preventing a lawful assertion that impacts are acceptable.

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 connections, and the effects on tourism create permanent impacts that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unfit for determination. The volume of informational deficiencies, combined with policy contradictions and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or utilises the applicable 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.

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: 54A30A1D

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under marine licensing and Environmental Impact Assessment regimes. The proposal raises serious concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles. It is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks an adequate evidential basis for lawful determination, as it omits critical environmental data, and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures an understanding of likely significant effects. Furthermore, the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. This results in documentation that fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects unsupported by robust evidence.

There are also substantial policy conflicts to address. 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 for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests needed for consent and impede the competent authority's ability to deem the development acceptable in policy terms.

The proposal's scale is unprecedented for this region, with large turbines positioned close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impacts. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and does not support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, clear, or credible account of the anticipated environmental effects associated with the proposal. One significant issue is the introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This element creates substantial uncertainty and hinders the application of a consistent worst-case scenario, thereby compromising the integrity of

the assessment. As a result, the impacts outlined may not accurately represent the development that will ultimately be constructed, leaving both the public and the competent authority without a true understanding of the environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. The request for consent is predicated on the assumption that any environmental harm will be addressed subsequently, which obstructs any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contravenes the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly delineated prior to determination.

Additional evidential deficiencies are present, notably gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings result in uncertainty regarding the magnitude and significance of the impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information precludes a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory obligations.

As a result of these issues, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to meet the requirements related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that adequate safeguards are in place.

In conclusion, the combination of reliance on an undefined design envelope, lack of specified mitigation, 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, meaning that the competent authority cannot justifiably determine the application based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The application inadequately addresses the assessment of alternatives, failing to meet the requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on their environmental impacts, it offers merely a narrative of project evolution. This method does not prove that less harmful options have been properly identified or assessed in preference to more damaging solutions.

The lack of a transparent, evidence-based comparison regarding alternative offshore locations, development scales, or design configurations is evident. Particularly, there is no indication that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. The West Lewis coastline's sensitivity and the critical role that proximity to shore plays in determining impact highlight the shortcomings of this analysis. Consequently, one cannot conclude that the proposed siting represents the least damaging option.

These shortcomings also extend to cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been properly explored to avoid or reduce impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been employed, leading to a reliance on post-design mitigation measures instead.

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

From a policy standpoint, these deficiencies jeopardise compliance with National Planning Framework 4, especially concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that reinforces the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, particularly concerning the West Lewis coastal environment, which is a sensitive and biologically active marine system. The methodologies employed are inadequate for capturing the presence, behaviour, and habitat use of species, resulting in an insufficient evidential basis for evaluating impacts.

Significantly, the application does not adequately recognise or assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. The failure to consider their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been properly evaluated. This inadequacy compromises any conclusions drawn about the absence of significant effects on this species.

Furthermore, there are notable deficiencies in the assessment of basking sharks, where

the reliance on aerial surveys creates significant detection bias, particularly under Atlantic conditions. This methodology likely underestimates the presence of basking sharks when compared to established land-based observations that show frequent use of these waters. The omission of such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological flaws lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the real scale of risk to marine species and habitats.

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

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

FISHERIES AND MARINE LIFE

The proposal's assessment of marine life and fisheries is fundamentally inadequate, failing to provide a thorough examination of both ecological and socio-economic implications. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the application does not adequately ensure that these vital habitats and activities will remain protected and maintained without considerable disruption.

A notable concern is the unsubstantiated assumption that fishing activities can be displaced without repercussions. There is a lack of evidence indicating that alternative fishing grounds are available, accessible, or able to accommodate any increased pressure from displaced fishing. This absence of information is critical, as such displacement could lead to overfishing in other areas and may result in broader economic ramifications for the local fishing fleet. Without a detailed and evidence-based evaluation, the implications for fisheries and local livelihoods are not fully understood.

Moreover, the proposal poses significant threats to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is anticipated to cause disturbance across considerable distances, impacting species including dolphins. The forecasted

disturbance to a substantial portion of the local bottlenose dolphin population raises alarming concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

Inconsistencies within the application are evident, as it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction diminishes the credibility of the assessment and raises alarms regarding adherence to the Habitats Regulations, especially when harm is expected to an extent that warrants legal authorization.

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

From a policy standpoint, the application does not illustrate conformity with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or evade unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal is sustainable.

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

TOURISM

The application presents significant deficiencies in its assessment of tourism impacts, neglecting to evaluate both the economic and social consequences for a crucial sector of the Isle of Lewis economy. It is vital to recognise that tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution from tourism.

Tourism on the Isle of Lewis has experienced substantial growth, with its value 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. Despite this positive trend, the application does not adequately model the potential impact of industrialising the seascape or the loss of environmental quality on Tourism Gross Value Added and overall economic resilience. Without this crucial analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Furthermore, the assessment overlooks the critical role that environmental quality

plays in bolstering tourism. It fails to consider the significance of unspoiled landscapes and dark skies for the visitor experience, particularly for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this inadequacy, leaving a considerable gap in understanding the impact on a recognised and expanding segment of the local economy.

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

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

In summary, the deficiencies in quantifying tourism impacts, assessing environmental factors that influence visitor behaviour, and considering the island's economic dependency result in a significant evidential gap. This lack of thorough analysis obstructs a comprehensive evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is procedurally and substantively unfit for determination, necessitating its refusal in its entirety. There are considerable gaps in the evidential basis necessary for a reliable assessment. The reliance on an undefined design envelope, unspecified mitigation measures, and a lack of comprehensive baseline data contribute to this deficiency. Key impact pathways, particularly those concerning nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. As a result, the Environmental Impact Assessment fails to provide a complete understanding of the likely significant effects and residual impacts.

Furthermore, the proposal directly conflicts with National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. It also falls short of showing that health and wellbeing impacts are acceptable and fails to evidence a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

The absence of a compliant Island Communities Impact Assessment represents a breach of 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's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also, in some instances, internally inconsistent. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been met, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal would instigate substantial and irreversible change to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, and disruption of cultural and visual relationships will have permanent effects that cannot be mitigated to an acceptable level. Collectively, the significant information deficiencies, policy conflicts, and unresolved environmental risks render the application unfit for determination. Thus, it is imperative that the competent authority refuse consent on these grounds or invoke the necessary regulatory provisions to obtain the missing information.

Additional Comments

I am a frequent visitor to this area and love the beauty of the island. We have enough wind power we do not need more.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 49D4759F

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 regulations. The objection is grounded in a detailed review of the Environmental Impact Assessment Report alongside other supporting documents, highlighting several material deficiencies related to planning, environmental factors, cultural concerns, and procedural aspects. Situated off the west side of the Isle of Lewis, the proposed development area is characterized by its Atlantic-facing coastline, a near-pristine environment, and a significant cultural identity. The size, proximity, and design of the wind farm raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks sufficient evidence for a lawful determination. There are substantial gaps in critical environmental data, with baseline information that is both limited and inconsistent, and many elements of the proposal remain undefined. The flexible design framework employed obscures an understanding of likely significant effects, and the dependence on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the supporting documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects are not backed by robust evidence.

There are evident policy conflicts within the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially concerning biodiversity, natural areas, cultural heritage, and public health and wellbeing. The application fails to establish that it can meet national standards for protecting biodiversity, climate interests, and environmental integrity. These discrepancies are crucial as they pertain to the statutory tests necessary for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposed wind farm is unprecedented for this location, with large turbines set very close to the shoreline, which raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential deficiencies, and clear non-compliance with policy indicate that the application is incomplete and unable to facilitate a lawful decision. In light of these issues, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and does not provide a clear or accurate account of the likely environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hinders a consistent application of a worst-case scenario, compromising the integrity of the assessment and obscuring the true extent of environmental effects from both the public and the competent authority.

Furthermore, the application depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent based on the premise that environmental harm will be managed later obstructs a meaningful evaluation of effectiveness and the assessment of residual impacts. Deferring crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established before any determination is made.

In addition, there are substantial evidential gaps, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects lack robust supporting data. The failure to provide adequate information prevents a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential standards set by the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it has not been established that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative account of project evolution. This deficiency indicates that the developer has not properly identified, assessed, or selected less harmful options over more damaging ones.

There is a notable absence of transparent comparisons regarding alternative offshore locations, development scales, or design configurations. The application does not convincingly show that the developer has considered positioning the turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. The West Lewis coastline is particularly sensitive, and the significance of proximity to shore in determining impact makes the lack of such analysis a critical flaw. Consequently, it is impossible to ascertain that the proposed siting is indeed the least damaging option.

Moreover, the shortcomings extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive receptors. This oversight includes regions of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy or comparative analysis suggests that mitigation by design has not been adequately applied, relying instead on measures that come into play after the design phase.

As a result, the application does not demonstrate that environmental harm has been effectively minimised through site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy, leaving the competent authority without a clear understanding of whether less harmful and more appropriate alternatives are available. Without a robust assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with policy.

From a policy standpoint, this lack of thoroughness undermines adherence to National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, leading to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is significantly lacking and fails to offer a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of species within this marine system. Consequently, the assessment does not present a robust evidential basis for evaluating potential impacts.

A notable shortcoming involves otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their active utilisation of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that the possible effects of construction disturbance, noise, and increased activity have not been sufficiently assessed. This oversight undermines any conclusions made about the absence of significant effects on this species.

Further issues are evident in the evaluation of basking sharks. The reliance on aerial surveys creates significant detection bias, particularly in the Atlantic conditions, likely leading to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate regular use of these waters. The failure to integrate or adequately consider such data culminates in an incomplete baseline, which diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. Additionally, the lack of adequate baseline data obstructs any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual level of risk posed 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 not properly identified or assessed protected species. The degree of uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions ultimately renders the assessment unreliable. These shortcomings inhibit a comprehensive evaluation of impacts on marine ecology and protected species, reinforcing the assertion that the application is lacking a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented is fundamentally flawed, with numerous gaps in evidence and contradictions that seriously undermine its conclusions. It fails to provide adequate assurance that the internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing decline, will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the development, yet the implications of displacement, collision risk, and habitat loss are not thoroughly examined.

A critical inconsistency arises within the application itself. The developer claims there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which should only occur if significant harm is anticipated. This contradiction raises serious doubts regarding the credibility of the assessment, suggesting that its conclusions lack support from the underlying evidence.

The assessment does not convincingly demonstrate that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these vital feeding grounds is inadequately considered, and reliance on modelling

techniques introduces a degree of uncertainty, particularly concerning declining species like Kittiwakes and Fulmars. The methodologies used appear to underestimate mortality rates, especially given the absence of complete baseline data and a full understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor introduces a substantial risk, effectively creating an obstacle in a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to conduct a thorough assessment of the long-term effects of sustained mortality in this corridor or the potential repercussions for species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, coupled with significant data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation necessitates the application of the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

Moreover, the identified deficiencies represent a breach of the National Planning Framework 4, particularly concerning the protection of biodiversity and the safeguarding of natural assets. The inability to substantiate that internationally important seabird populations will remain unaffected places the proposal in direct opposition to national policy.

In summary, the assessment's reliability is compromised due to its internal contradictions, methodological flaws, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Furthermore, the assessment overlooks intangible cultural heritage elements, such as the Gaelic language and local traditions, as well as the community's longstanding

relationship with the coastal environment. These factors are essential to the area's identity but are entirely missing from the evaluation, creating a significant gap in understanding the cultural impact of the proposed development.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. While the developer engaged with local residents through focus groups, the full report remains unpublished, creating a crucial evidential gap. This absence of information obstructs both public understanding and the competent authority's ability to gauge the extent of social risks identified through the developer's research.

Preliminary summaries reveal that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These issues stem from direct community engagement and are not based on speculation. Nonetheless, the withholding of the complete assessment restricts thorough scrutiny of the findings and hinders the determination of their significance in the decision-making process.

Moreover, there is recognition that the proposal poses a direct threat to community

identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately integrated into the main application or given the appropriate consideration. By not disclosing the entire Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency also undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health implications is crucial for developments of this scale. The application fails to present a complete evidential basis necessary for assessing the balance between benefits and potential harm by omitting the full dataset.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes while minimising harm, yet the available evidence highlights existing adverse effects that remain inadequately disclosed. Without access to the full assessment, demonstrating adherence to this policy is not feasible.

The procedural ramifications are substantial. 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 and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation hampers a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The application for large-scale turbines in close proximity to the shoreline would introduce a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient and does not sufficiently represent the scale of change or the sensitivity of the receiving environment.

There are significant concerns regarding the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially in relation to cultural heritage sites and valuable landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

The application also fails to examine the interconnected relationships between

landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting linked to the Atlantic horizon. The assessment treats these sites as isolated entities without acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

Furthermore, the industrialisation of the seascape would disrupt these relationships and alter the context in which heritage assets are experienced. This not only represents a visual impact but also entails broader cultural and spatial harm that has not been sufficiently evaluated within the application.

From a policy perspective, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. The absence of a robust worst-case assessment further weakens the claim of compliance with policy requirements.

Finally, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their dominant presence, making any change fundamentally permanent rather than reducible to an acceptable level through mitigation. Collectively, these deficiencies highlight the failure to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, reinforcing the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The 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 waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the current application presents an inadequate assessment of fisheries and marine life, failing to robustly evaluate ecological or socio-economic impacts. There is a significant concern regarding the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds are available or can absorb additional pressure, raising the risk of overfishing in other areas, which could have far-reaching economic consequences for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain poorly understood.

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project lacks completeness, particularly concerning the onshore infrastructure, which fails to fully account for the impacts of what constitutes a single integrated project. The separate evaluations of the offshore turbines and onshore works result in a fragmented understanding of the environmental and socio-economic effects, obscuring the true scale of the project's overall impact.

Onshore elements of the project involve significant activities, including cabling that traverses protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. Notably, these works include excavation in areas of deep peat, especially within Barvas Moor, which serves as a vital carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which prevents a comprehensive understanding of the project's environmental footprint.

The application's exclusion or deferral of onshore impact assessments hinders proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all project components must be evaluated collectively. However, the division between offshore and onshore assessments leads to an incomplete understanding of the combined impacts on peatlands, habitats, and surrounding communities.

Additionally, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not clearly demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate measures for avoidance have been implemented, resulting in a significant evidential gap regarding biodiversity protection.

Concerns also arise with respect to carbon balance. Disturbance of peatland has the potential to release stored carbon, leading to a carbon debt that may contradict the

aims of renewable energy development. The application does not adequately address this issue or provide evidence that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land may create conflicts with existing land use and legal rights. There is insufficient evidence within the application to confirm that the necessary consents or processes have been initiated, prompting questions about deliverability and lawful implementation.

From a policy standpoint, the lack of a holistic assessment of the project and failure to demonstrate adequate 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 undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation regarding nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. No assessment has been made concerning the impacts of artificial lighting on species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly sensitive to light. These species can experience disorientation due to phototaxis, leading to an increased risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, which means it fails to consider how the proposed aviation lighting could affect these species or potentially increase mortality rates.

Moreover, the assessment relies on daytime survey data, neglecting nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are similarly vulnerable to the effects of artificial lighting. This oversight creates a critical gap in understanding the ecological impacts that the proposal may have on local wildlife.

The introduction of permanent red aviation lighting is another significant concern. This lighting would be visible over long distances, creating an intrusive "wall of light" across the western horizon, which would fundamentally alter the night-time environment. The assessment does not address how this would impact visual amenity, landscape character, or the experience of residents and visitors, despite the importance of dark skies to the area's identity and its emerging tourism sectors, such as astro-tourism.

From a policy standpoint, these omissions conflict with National Planning Framework 4, which relates to the protection of natural places and environmental quality. The absence of an assessment of dark skies undermines the broader evaluation of landscape and seascape impacts, as the night-time character is an integral part of the

environment.

Overall, the failure to assess the impacts on dark skies and nocturnal wildlife constitutes a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination. Without a thorough assessment, it is impossible to ascertain whether protected species or designated sites would be adversely affected, which engages the precautionary principle and necessitates a more cautious approach.

TOURISM

The application presents a materially deficient assessment of tourism impacts, neglecting to evaluate the economic and social ramifications for a key sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment regarding how large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions.

Tourism on the island has seen substantial growth, with revenues increasing from £65 million in 2017 to over £81.5 million. This sector supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite this significance, the application does not evaluate how the industrialisation of the seascape and a potential decline in environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains uncertain whether the proposed development would yield a net economic benefit or threaten a vital and expanding sector.

Furthermore, the assessment inadequately addresses the critical role of environmental quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies to visitor experience. The importance of emerging markets, such as nature-based tourism and astro-tourism, is overlooked, and the absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a lack of understanding regarding impacts on a recognised and growing component of the local economy.

The implications extend beyond tourism, affecting employment, local businesses, and community sustainability within an island community that already experiences limited economic diversification. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4, particularly concerning economic impacts and the necessity of showing net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector, and fails to furnish adequate evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the inability to quantify tourism impacts, to evaluate the environmental factors influencing visitor behaviour, and to consider the economic dependency of the island culminates in a significant evidential gap. This gap obstructs a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development, as determined by statutory duties, national policy, and evidential standards. It mirrors the core issues of the 2008 Lewis Wind Power proposal refusal, where the degree of industrialisation was deemed unacceptable. This current application is presented within a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data undermine the evidential basis necessary for proper determination. The reliance on an undefined design envelope, unspecified mitigation measures, and the omission of key impact pathways, such as those related to nocturnal wildlife, full onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. This inadequacy obstructs a full understanding of the likely significant effects and residual impacts of the proposal.

There are also significant procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a comprehensive Social Impact Assessment represents a material omission. These deficiencies hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

In direct contradiction to National Planning Framework 4, the proposal does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. It fails to establish 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. Furthermore, the cumulative effects of both offshore and onshore components have not been adequately assessed, which obscures potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty remains regarding environmental risks, with incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals. The evidential threshold required to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

The proposal would lead to 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 adverse effects on tourism

constitute permanent impacts that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, alongside policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority is urged to either refuse consent on these grounds or utilise the relevant regulatory provisions to compel the submission of the outstanding information.

It is therefore 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: BE730F1C

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is founded on a thorough examination of the Environmental Impact Assessment Report and accompanying documentation, highlighting 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, a region characterised by its Atlantic-facing coastline, relatively untouched environment, and strong cultural identity. Concerns regarding the scale, proximity, and design of the project raise serious questions about its adherence to 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, with baseline information being limited and inconsistent, and significant components of the proposal remaining undefined. The flexible design framework used hinders a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures makes 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.

There are evident 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 environments, cultural heritage, and health and wellbeing. It does not demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to determine the acceptability of the development in policy terms.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the proposal is significantly lacking, failing to offer a thorough and dependable understanding of ecological receptors in the West Lewis coastal area. This marine system is both highly sensitive and biologically active, yet the existing baseline data remains incomplete, while the methodologies employed do not effectively capture essential aspects such as species presence, behaviour, and habitat utilisation. Consequently, the assessment does not furnish a sound evidential framework for assessing potential impacts.

One notable gap concerns otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active utilisation of coastal regions for foraging and movement. The oversight of their core foraging areas and behavioural patterns leads to an inadequate evaluation of the possible impacts stemming from construction activities, noise, and increased human activity. This deficiency undermines any assertions about the lack of significant effects on the otter population.

Moreover, the assessment of basking sharks exhibits further shortcomings, particularly due to reliance on aerial surveys that introduce considerable detection bias, especially under Atlantic weather conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate frequent usage of these waters. The exclusion or insufficient consideration of such data results in an incomplete baseline and diminishes the trustworthiness of the conclusions drawn.

These methodological flaws indicate that the assertions of negligible or non-significant effects rest more on presumptions than on solid evidence. The lack of comprehensive baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment framework and National Planning Framework 4, as there has been inadequate identification and assessment of protected species. The uncertainty introduced by these shortcomings means that it is impossible to rule out adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of 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 unsubstantiated conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, contributing to the overall determination that the application lacks a sufficient evidential basis.

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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks transparency regarding social impacts, health, and wellbeing, significantly undermining its evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, yet the full report remains unpublished. This absence creates an evidential gap that hinders both public understanding and the competent authority's ability to grasp the extent of social risks identified in the developer's research.

Residents have reported experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts stem from direct engagement with the community and are not based on speculation. However, the failure to release the complete assessment restricts proper scrutiny of its findings and limits the determination of their significance in the decision-making process.

Furthermore, there are indications that the proposal is viewed as a threat to community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Yet, these social impacts have not been fully integrated into the application or given due consideration. The withholding of the full Social Impact Assessment conceals the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functioning could be affected. Without the complete dataset, the application fails to provide a robust evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm, yet existing evidence points to adverse effects that have not been fully disclosed. Consequently, without 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 access to the entire Social Impact Assessment. This omission constitutes a material flaw in the application and a failure to satisfy the evidential requirements mandated by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, coupled with documented existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Concerns arise regarding the magnitude of visual change conveyed by the application. The scale and location of the turbines mean they would dominate the views from residential areas, historic sites, and popular coastal locations. Such dominance would adversely affect visual amenity and diminish the defining features of naturalness and remoteness. The assessment fails to adequately reflect the significance of this impact within the context of such a sensitive landscape.

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries associated with the proposed development is inadequate, failing to adequately address the ecological and socio-economic repercussions. The coastal waters off West Lewis are home to a diverse marine ecosystem and support a thriving fishing industry. However, the application does not convincingly demonstrate that these vital habitats and activities can be preserved or sustained without significant disruption.

A significant concern is the assumption that displacing fishing operations will not have repercussions. The documentation lacks evidence regarding the availability, accessibility, and capability of alternative fishing grounds to manage increased pressure. This gap is crucial as it raises the risk of overfishing in other areas, potentially leading to broader economic challenges for the local fishing fleet. Without a thorough and evidence-based evaluation, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended timeframe is likely to disrupt marine life across extensive distances, impacting species such as dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population is particularly concerning; however, the application diminishes the importance of these impacts without adequate supporting evidence.

There exists a notable inconsistency in the application, which acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises questions regarding adherence to the Habitats Regulations, especially in situations where harm is expected to reach a level that requires legal approval.

Additionally, the assessment does not adequately address the cumulative impacts resulting from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough analysis of these combined influences, it is impossible to ascertain the overall effects on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can harmonise with current marine users or evade unacceptable consequences for marine biodiversity, thus obstructing any assertion that the proposal

aligns with sustainable development principles.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is notably lacking in its evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, a crucial aspect of both environmental quality and cultural identity, as well as an important factor for tourism. The proposed installation of permanent red aviation lighting would create a continuous "wall of light" effect that could be seen from long distances, fundamentally changing the night-time landscape.

Furthermore, there is no consideration of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This omission is particularly concerning given the area's reliance on dark skies, which is vital for the growth of emerging tourism sectors, including astro-tourism. Consequently, this gap in the landscape and environmental assessment is glaring.

The application also fails to address the potential impacts on nocturnal wildlife, such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly susceptible to artificial lighting. This susceptibility can lead to disorientation and an increased risk of collision. Without a lighting impact assessment or a study on phototaxis, the proposal does not adequately consider how aviation lighting could affect these species or lead to increased mortality rates.

Additionally, the reliance on daytime survey data in the ornithological assessment is troubling, as it does not take into account nocturnal activity or the associated risks. Other species, such as Kittiwakes, may forage or migrate at night, yet their vulnerability to artificial lighting has not been evaluated. The lack of site-specific data regarding night-time activity creates a vital gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it remains unclear whether protected species or designated sites could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and calls into question the legality of the proposal.

From a policy standpoint, this lack of assessment contravenes National Planning Framework 4, which seeks to protect natural places and maintain environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts,

as the character of the night environment is a crucial component of the broader ecosystem.

In conclusion, the failure to assess dark skies and nocturnal wildlife represents a substantial evidential gap. The absence of baseline data, impact modelling, and specific analyses of affected species makes the application incomplete and unsuitable for lawful determination.

TOURISM

The application under consideration presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate both the economic and social ramifications for a vital sector of the Isle of Lewis economy. The economy of the island is heavily reliant on its wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is noted that 86% of visitors are attracted by the scenery, the application fails to provide any quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Tourism on the Isle of Lewis has experienced noteworthy growth, rising from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, accounting for up to 16% of the island's economy. However, there is no modelling of how the industrialisation of the seascape and the resulting decline in environmental quality would affect Tourism Gross Value Added or broader economic resilience. Without such an analysis, it remains unclear whether the proposed development would bring about a net economic benefit or harm an already established and expanding sector.

Another critical aspect overlooked in the assessment is the importance of environmental quality in sustaining tourism, particularly how unspoiled landscapes and dark skies enhance visitor experiences and cater to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment only exacerbates this issue, resulting in a substantial gap in understanding the potential effects on a recognised and thriving part of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate the impacts on tourism has broader implications, affecting employment, local businesses, and overall community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly addressed, contrary to the requirements set out in the Islands (Scotland) Act 2018.

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

Overall, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This gap hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential standards. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. It is now presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical gaps in the evidential basis provided for this application, including incomplete baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the absence of key impact pathways such as effects on nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to offer a comprehensive understanding of the likely significant effects or residual impacts.

Moreover, the application exhibits clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal is at odds with National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore components have not been properly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold required to affirm the absence of adverse effects beyond reasonable scientific doubt has not been fulfilled, necessitating the application of the precautionary principle and preventing any lawful conclusion that impacts can be deemed acceptable.

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

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

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

Additional Comments

The impact these turbines will have on our marine wildlife is significant, and devastating. The impact they'll have on people's mental health is worrying - these islands thrive on the natural beauty of them, their peace and quiet, their 'being back to nature' feeling - and the impact on tourism is undeniable. People come here for all of the above. Take that away and they stay away.

There are better, more suitable places to site such a farm, why not consider floating farms further offshore? Given the weather conditions on the west coast of Lewis, wave technology would be a better, safer and more economical solution. It doesn't appear as if the developers have seriously considered this application and the local council is just seeing money signs, which is understandable given the crunch on public finances but unforgivable when they are meant to represent the 'local' people - which they are not doing by declaring support for Spiorad Na Mara.

I, and over 80% of the population of Lewis, urge you to object to these plans.

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: E9E7AE9A

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

Dear Sir/Madam

This letter formally objects to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from an analysis of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies in planning, environmental matters, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. There are serious concerns about how the scale, design, and location of this project align with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation necessary for a lawful decision. Key environmental data is absent, baseline information is inconsistent and limited, and various elements of the proposal remain unclear. The reliance on a flexible design framework complicates the assessment of likely significant effects. Furthermore, the proposed mitigation measures have not been clearly defined, making 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 strong evidence.

There are evident policy inconsistencies with national frameworks. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, especially concerning biodiversity, cultural heritage, natural places, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity and environmental integrity. These inconsistencies challenge the statutory tests required for consent, compromising the competent authority's ability to deem the development acceptable from a policy perspective.

The size of the proposal is unprecedented for this area, with large turbines situated near the shoreline, which raises substantial concerns about landscape capacity, visual impact, and environmental consequences. In light of the insufficient information provided, the dependence on undefined mitigation strategies, evidential shortcomings, and clear policy conflicts, it is evident that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle must be applied in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to significant evidential deficiencies, including gaps in baseline data and limitations in methodology, which rely on assumptions rather than site-specific evidence. This creates uncertainty around the scale and significance of impacts, especially where conclusions suggest negligible or non-significant effects without adequate supporting data. Such inadequacies hinder a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that does not align with statutory requirements.

Moreover, the Environmental Impact Assessment Report is materially deficient, failing to provide a complete, transparent, or reliable overview of the likely environmental effects associated with the proposal. The implementation of a flexible Project Design Envelope, lacking firm commitments to specific turbine dimensions, layouts, or configurations, further complicates the situation by introducing uncertainty. This lack of clarity undermines the integrity of the assessment and means that the impacts described may not truly reflect the development that will be constructed, thereby preventing both the public and the competent authority from fully grasping the environmental implications.

Consent is sought on the basis that environmental harm will be mitigated at a later stage, which is procedurally unacceptable. This approach conflicts with the objective of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly defined before any determination is made. The absence of defined mitigation measures, monitoring strategies, and management plans further exacerbates the problem, leaving the assessment incomplete and unreliable.

Consequently, the application does not meet the evidential threshold set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding the protection of biodiversity and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation, and substantial gaps in baseline data leads to an Environmental Impact Assessment Report that is not only incomplete but also unreliable. These deficiencies obstruct a lawful and rigorous evaluation of environmental effects and place the competent authority in a position where it cannot appropriately determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned analysis of alternatives, which is essential for compliance with the statutory requirements of the Environmental Impact Assessment regime. Instead of a detailed comparison of feasible alternatives grounded in environmental considerations, the documentation offers merely a narrative of the project's development. This shortcoming indicates that less harmful options

have not been thoroughly identified, evaluated, or selected over more detrimental solutions.

There is a noticeable absence of transparent, evidence-based comparisons concerning different offshore locations, scales of development, or design configurations. Specifically, the application does not illustrate that the developer has meaningfully assessed the possibility of placing turbines further offshore, an action that could potentially mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining environmental effects, this lack of analysis prohibits any conclusion that the proposed siting is indeed the least damaging option.

The inadequacies extend to the assessment of cable routing and landfall, revealing insufficient evidence of the exploration of alternative routes aimed at avoiding or minimising impacts on sensitive receptors. This includes significant locations of cultural and spiritual relevance such as Barvas Cemetery. The failure to present a clear avoidance strategy, coupled with the absence of comparative analysis, suggests that mitigation by design has not been effectively implemented, relying instead on post-design measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a clear failure to adhere to the established mitigation hierarchy and inhibits the competent authority's ability to ascertain the existence of less harmful and more suitable alternatives. In the absence of a rigorous alternatives assessment, it cannot be affirmed that the proposal stands as a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency casts doubt on 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 constitutes a material omission that contributes to the overarching conclusion that the application has not been sufficiently evaluated and does not warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

Among the key issues is the failure to recognise and properly assess otters, a European Protected Species, and their active use of coastal areas for foraging and movement. The application does not take into account their core foraging range and behavioural

patterns, which means the assessment does not adequately consider the potential effects of construction disturbance, noise, and increased activity. Consequently, this undermines any conclusions drawn regarding the absence of significant effects on this species.

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

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

From a regulatory standpoint, the application does not meet the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4. Protected species have not been properly identified or assessed, and the level of uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is fundamentally flawed, suffering from significant evidence gaps and internal contradictions that severely compromise its conclusions. The site on the west coast of the Isle of Lewis is critical for internationally significant seabird populations, which are already experiencing declines. However, the application fails to adequately demonstrate, to the required evidential standard, that these species will not be adversely impacted. It is situated within vital foraging areas and migratory routes, yet the assessment inadequately addresses the potential consequences of displacement, collision risks, or habitat loss.

Contradictions are evident in the application as the developer claims there are no significant adverse effects while concurrently submitting a Habitats Regulations derogation case, necessitated only where significant harm is anticipated. This

inconsistency raises doubts about the assessment's reliability, suggesting that the conclusions drawn are not substantiated by the underlying evidence.

The assessment lacks sufficient proof that seabird species associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately considered, and the reliance on modelling methodologies introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. There is a high likelihood that mortality rates are underestimated due to incomplete baseline data and a lack of understanding regarding behavioural responses.

Additionally, the location of turbines within a recognised migratory corridor poses a considerable risk, potentially creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor and the impact on species with small global populations have not been thoroughly assessed.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory assertions, combined with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

Overall, the identified deficiencies highlight a failure to comply with the National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy. Collectively, these issues render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence, ultimately leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. Instead of appreciating heritage as an evolving entity with ongoing social, cultural, and spiritual significance, the application adopts a simplistic view that treats it as a collection of isolated, static assets.

There is a critical shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are approached. These sites are active areas for burial and spiritual observance, yet the assessment overlooks their current use, meaning, and the potential impacts of development on their environment. This misrepresentation leads to an incomplete understanding of cultural implications, neglecting their integral

role in community life.

Moreover, the assessment fails to address intangible cultural heritage elements, including the Gaelic language and traditions, as well as the long-standing relationship the community has with the coastal environment. These components are essential to the area's identity but are conspicuously absent from the evaluation, resulting in a significant gap. Without acknowledging these factors, the true cultural impact of the development remains obscured.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population embodies a unique cultural identity characteristic of Indigenous Peoples; however, there has been no process for Free, Prior and Informed Consent. This lack of meaningful engagement compromises the assessment's validity and disregards established principles of community involvement in matters affecting cultural and environmental interests.

Compounding these issues is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without such an assessment, the competent authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission is a significant barrier to lawful decision-making.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, clearly diverges from established policy requirements.

Ultimately, the absence of a thorough evaluation of living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a substantial evidential void. The cultural ramifications of the proposed development have not been adequately assessed, and the application fails to deliver a solid foundation for understanding the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current application raises significant concerns regarding the assessment of social impacts, health, and wellbeing, which is markedly deficient and lacks the necessary transparency for a lawful evaluation. While the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This creates a considerable evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's own research.

Summaries available indicate that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These reported impacts stem from direct community engagement, which underscores their legitimacy. Nevertheless, the absence of the complete assessment curtails proper scrutiny of the

findings and limits the determination of their significance within the decision-making process.

Furthermore, there is evidence suggesting that the proposal is seen as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Unfortunately, these significant impacts have not been properly integrated into the main application or given the weight they deserve. The withholding of the full Social Impact Assessment obscures the genuine human and social cost associated with the development.

This lack of transparency seriously undermines the Environmental Impact Assessment process, where a comprehensive understanding of social, economic, and health impacts is critical, especially for developments that could affect community character and functioning. The application fails to provide a complete evidential basis for assessing the balance between potential benefits and harms due to the absence of the full dataset.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the available evidence points to existing adverse effects that remain inadequately disclosed. Consequently, it cannot be established that the application complies with this policy without the full assessment.

The procedural ramifications of these shortcomings are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission is material within the application and represents a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, coupled with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This shortfall obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not reflect the sensitivity of the environment or the scale of change adequately. The West Lewis coastline, characterised by an open Atlantic horizon and an undeveloped character, offers a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create an overwhelming industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to accurately represent the extent of visual change. Given the scale and proximity of the turbines, they would dominate views from residential areas,

historic sites, and popular coastal locations. This would have a direct impact on visual amenity, eroding the essential qualities of naturalness and remoteness. The assessment does not properly convey the significance of this impact, especially within such a sensitive landscape.

Concerns arise over the selection and presentation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to significant cultural heritage sites and valuable landscapes. This raises the possibility that the magnitude of visual impact has been underestimated, which undermines the reliability of the assessment.

Moreover, the application fails to evaluate the interconnected relationship between landscape, seascape, and cultural heritage effectively. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated assets, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their link to the natural horizon. This represents not only a visual impact but also a broader cultural and spatial harm that has not been thoroughly evaluated within the application.

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 extent of change proposed is incompatible with the need to safeguard landscape character, visual amenity, and the context of culturally significant sites. The lack of a robust worst-case assessment further undermines the claim of compliance with policy.

Additionally, it is evident that the identified impacts cannot be effectively mitigated. The dominant and unavoidable presence of the turbines, due to their scale, height, and proximity, means that the resulting changes are fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails extensive seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking crucial detail, which is essential for evaluating potential environmental impacts. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included with the application, which instead relies on

unspecified mitigation and contingency measures that are to be prepared after consent is granted. This approach hampers any meaningful assessment of their adequacy or effectiveness.

The environment receiving these works is particularly sensitive, with the West Lewis coastline characterised by clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. While the application acknowledges certain risks, including sediment mobilisation and accidental chemical or oil spills, it falls short of providing adequate details on prevention, control, or monitoring measures.

Moreover, there remains uncertainty regarding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. Without comprehensive modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of such impacts. This uncertainty also encompasses potential effects on marine species and habitats, which are already identified as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether suitable safeguards are in place to address pollution events. This creates procedural risks and diminishes the ability of the competent authority to appraise the environmental protection measures during the decision-making process.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant likely effects and their corresponding mitigation must be evaluated prior to granting consent; therefore, the absence of such information makes a lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries associated with the proposed development is inadequate, failing to adequately address the ecological and socio-economic repercussions. The coastal waters off West Lewis are home to a diverse marine ecosystem and support a thriving fishing industry. However, the application does not convincingly demonstrate that these vital habitats and activities can be preserved or sustained without significant disruption.

A significant concern is the assumption that displacing fishing operations will not have repercussions. The documentation lacks evidence regarding the availability, accessibility, and capability of alternative fishing grounds to manage increased pressure. This gap is crucial as it raises the risk of overfishing in other areas, potentially leading to broader economic challenges for the local fishing fleet. Without a thorough and evidence-based evaluation, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended timeframe is likely to disrupt marine life across extensive distances, impacting species such as dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population is particularly concerning; however, the application diminishes the importance of these impacts without adequate supporting evidence.

There exists a notable inconsistency in the application, which acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises questions regarding adherence to the Habitats Regulations, especially in situations where harm is expected to reach a level that requires legal approval.

Additionally, the assessment does not adequately address the cumulative impacts resulting from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough analysis of these combined influences, it is impossible to ascertain the overall effects on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can harmonise with current marine users or evade unacceptable consequences for marine biodiversity, thus obstructing any assertion that the proposal aligns with sustainable development principles.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines and onshore works as part of a single integrated project is fundamentally flawed, as it neglects to consider the full range of impacts. The onshore elements, which include cabling across protected moorland and the construction of a substation near Stornoway, are inextricably linked to the offshore

components. However, by assessing these elements separately, the application presents a disjointed view that obscures the overall environmental and socio-economic consequences of the project.

The proposed infrastructure involves excavation across areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The failure to comprehensively assess these impacts leads to an incomplete understanding of the project's environmental footprint. Furthermore, by excluding or deferring the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project are considered collectively, but the current separation results in an inadequate understanding of the combined impacts on peatlands, habitats, and communities.

Additionally, the proposal poses considerable risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application lacks evidence that the potential impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures are in place, indicating a significant gap in biodiversity protection.

Concerns regarding carbon balance are also pertinent, as the disturbance of peatland may release stored carbon, thereby potentially incurring a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this aspect or demonstrate that the overall carbon balance is indeed beneficial.

The routing of the infrastructure through active croft land raises further issues, potentially conflicting with existing land use and legal rights. There is no evidence that the necessary consents or processes have been initiated, which raises questions about the project's deliverability and lawful execution.

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

In summary, the separation of project components, the lack of a comprehensive assessment, and the absence of substantiated evidence regarding environmental and land use impacts result in an incomplete and unreliable application, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application lacks a comprehensive assessment of dark skies and nocturnal wildlife, which is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which contribute greatly to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting visible over long distances

would create an intrusive "wall of light" effect on the western horizon, fundamentally changing the night-time environment.

There is no analysis of how this lighting will affect visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly concerning given the crucial role dark skies play in the area's identity and the growth of tourism sectors such as astro-tourism. The failure to examine these impacts represents a clear deficiency in the overall assessment of the landscape and environment.

The application also neglects to evaluate the effects on nocturnal wildlife. Species including 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 heighten collision risks. Without a lighting impact assessment or phototaxis study, the proposal fails to consider how aviation lighting could affect these species or increase mortality rates.

This shortcoming is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and related risks. Other species, such as Kittiwakes, may also forage or migrate at night and are susceptible to disorientation caused by artificial lighting. The lack of site-specific night-time data leads to a critical deficiency in understanding ecological impacts.

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

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

Overall, the failure to assess dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and specific analysis of affected species leaves the application incomplete and unable to support a lawful determination.

TOURISM

The evaluation of tourism impacts within the application is inadequate, neglecting to address the economic and social ramifications for a critical component of the Isle of Lewis economy. The island's tourism sector relies heavily on its scenic coastline, largely untouched landscapes, dark skies, and a sense of isolation. While the application notes that 86% of visitors are attracted by the scenery, it lacks a detailed quantitative analysis of how extensive offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution.

Tourism has experienced substantial growth, with revenue rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and representing up to 16% of the island's economy. Despite this progress, the application fails to explore how the potential industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added and the broader economic resilience. Without such an evaluation, it remains unclear if the development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the analysis does not consider the significance of environmental quality in bolstering tourism, particularly the value of pristine landscapes and dark skies for visitor experiences. This oversight, compounded by the absence of a Dark Skies Assessment, creates a notable gap in understanding the impact on an increasingly important segment of the local economy, including emerging markets like nature-based tourism and astro-tourism.

For an island community that exhibits limited economic diversification, the neglect of tourism impacts carries broader implications for employment, local enterprises, and the sustainability of the community. The failure to conduct a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been assessed in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not substantiate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to illustrate net benefit. Furthermore, it contradicts strategic objectives that designate tourism as a priority growth sector, lacking the necessary evidence for the competent authority to properly evaluate the economic ramifications of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental influences on visitor behaviour, and acknowledging the island's economic dependency create a significant evidential shortfall. This situation hinders a thorough appraisal of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally inadequate in meeting the criteria for sustainable development as set forth by statutory obligations, national policy, and evidential standards. It echoes the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current proposal, despite being under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to address these critical issues.

Furthermore, the application lacks a comprehensive and reliable evidential foundation for assessment. It presents significant deficiencies in baseline data, continues to utilise

an undefined design envelope, relies on unspecified mitigation measures, and neglects to consider important impact pathways related to nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, inhibiting a thorough understanding of the potential significant effects and residual impacts.

Procedural errors are also evident. The failure to provide a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as mandated by the Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment presents a material shortfall, obstructing the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for consideration.

The proposal contravenes the National Planning Framework 4 by not sufficiently demonstrating the protection of biodiversity, natural sites, and cultural heritage. It does not adequately assess health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, leaving potential effects on peatlands, carbon balance, habitats, and crofting land obscured.

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

Moreover, the proposal would lead to substantial and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual connections, and effects on tourism are permanent changes that cannot be mitigated to a satisfactory degree.

In summary, this application is procedurally and substantively unfit for determination. The multitude of information gaps, coupled with conflicts in policy and unresolved environmental uncertainties, impede a lawful and evidence-based decision. The competent authority must reject this application outright or utilise the applicable regulatory measures to require the submission of the necessary information.

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

Additional Comments

To whom it may concern, the very thought of such a huge industry monstrosity on the Westside of Lewis is a disgrace, not only will property prices crash, the area will

become disfigured. People will more than likely move away from here, myself and family included.

The Island is just holding on to its population. This horrendous development will have negative consequences for along time to come.

We have an aging population, many with dementia, the stress that could potentially be caused by them seeing these monstrous unsightly turbines. When they have spent a lifetime living and working on the crofts in an area of outstanding beauty.

The horrific destruction of beautiful unspoiled scenery. The negative impact on wildlife and marine ecosystems is unfathomable.

My mother is native to the island, and was the reason I bought a property and made a life here. I strongly object to this development for countless reasons.

Yet again the Island it's beautiful unspoiled waters and scenery is being used to benefit others, and we are supposed to just put up with it? It's going to be the modern version of the clearances .

The token gesture of a few million to a few community's is an insult. The Island is one of the areas with the highest levels of fuel poverty, the development that we are supposed agree with, will have no direct benefit to the people of Lewis.

[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: DBAB9FFF

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

Dear Sir/Madam

This objection is formally lodged against the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development's location off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity, raises significant issues. The scale, proximity, and design of the proposal present fundamental concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

An adequate evidential basis for a lawful determination is lacking, as critical environmental data is missing and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined. The flexible design framework utilised prevents a clear understanding of likely significant effects, and without specified mitigation measures, it is impossible to assess their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Substantive policy conflicts are evident, as the proposal seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests required for consent and weaken the competent authority's ability to conclude that the development is acceptable in policy terms.

Unprecedented in scale for this location, the proposal features large turbines positioned close to the shoreline, leading to serious concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the environmental effects of the proposal. It utilises a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations. This absence of

defined parameters introduces uncertainty and complicates the ability to apply a worst-case scenario consistently. Consequently, the impacts reported may not align with the development that is ultimately constructed, inhibiting both public understanding and the competent authority's ability to gauge the true environmental consequences.

Furthermore, the application is heavily contingent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed later impedes a thorough evaluation of effectiveness and an assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and runs counter to the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures be clearly identified prior to determination.

The assessment also suffers from notable evidential weaknesses, including inadequacies in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of impacts, especially when conclusions suggest negligible or non-significant effects without robust supporting data. The lack of sufficient information prevents a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that is incompatible with statutory obligations.

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

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

ASSESSMENT OF ALTERNATIVES

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

There is a notable absence of a transparent or evidence-based comparison regarding

alternative offshore locations, development scales, or design configurations. The application does not prove that the developer has thoroughly considered placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be lessened. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in determining impact, the failure to conduct such analysis stops any conclusion that the proposed siting is the least damaging option.

The shortcomings extend to the cable routing and landfall assessment as well, with insufficient evidence that alternative routes have been properly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation by design has not been applied; instead, there seems to be an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This is a clear deviation from the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, one cannot conclude that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency adversely affects adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is lacking in depth and fails to deliver a thorough understanding of ecological receptors in the West Lewis coastal area. This marine environment is known to be sensitive and biologically rich. However, the baseline data is incomplete, and the methods used do not adequately document species presence, behaviour, and habitat usage. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant gap pertains to otters, which are classified as a European Protected Species. The application does not sufficiently recognise or assess their use of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an inadequate evaluation of the impacts of construction disturbance, noise, and increased activity. This flaw undermines the findings regarding the absence of significant effects on this species.

There are also shortcomings in the assessment of basking sharks, as the reliance on aerial surveys introduces major detection bias, especially under Atlantic conditions. This method likely underrepresents their presence, in contrast to established land-

based observations that show frequent usage of these waters. Not considering such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that any assertions of negligible or non-significant effects are grounded in assumptions rather than strong evidence. The lack of adequate baseline data also obstructs a meaningful evaluation of cumulative and indirect impacts, which include seasonal changes and broader ecosystem interactions. This raises uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment framework and National Planning Framework 4. Protected species have not been correctly identified or assessed. The uncertainty created prevents the dismissal of adverse effects beyond reasonable scientific doubt, which necessitates adherence to the precautionary principle. Thus, in these circumstances, consent cannot be granted legally.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate that internationally important seabird populations along the west coast of the Isle of Lewis will not be adversely affected. This region supports many seabirds that are already in decline, and yet the ornithological assessment is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The siting of turbines within a recognised migratory corridor introduces considerable risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately consider the long-term implications of sustained mortality in this corridor or the potential effects on species with small global populations.

Moreover, there exists a fundamental contradiction within the application, as the developer concludes no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. Such a case is only required when significant harm is expected, which calls into question the reliability of the assessment. The assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is inadequately addressed, and the reliance on modelling approaches introduces uncertainty, particularly for species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially in instances where baseline data is incomplete and behavioural responses are not fully understood.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude 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 satisfied. This situation invokes the precautionary principle and prevents a lawful conclusion in support of consent. Furthermore, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. Ultimately, the assessment is deemed unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, which collectively hinder a robust evaluation of impacts and confirm that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

The absence of consideration for intangible cultural heritage, which encompasses the Gaelic language, traditions, and the community's enduring connection to the coastal environment, further compounds these issues. These aspects are vital to the area's identity yet are entirely overlooked in the assessment, representing a considerable gap. Without addressing these essential elements, the true cultural impact of the development remains misunderstood.

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

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

the island community, rendering a lawful determination impossible.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing represents a significant concern and undermines the lawful evaluation of the proposal. The developer commissioned a Social Impact Assessment, including focus groups with local residents, yet has not published the full report. This has resulted in a substantial evidential gap that prevents both the public and the competent authority from fully understanding the social risks identified in the developer's own research.

Residents are already reporting measurable stress, anxiety, and concern regarding the scale and proximity of the proposal, with these impacts arising from direct engagement rather than speculation. However, the inability to access the complete assessment hampers proper scrutiny of the findings and restricts the capacity to evaluate their significance within the decision-making process.

Moreover, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with references to "cultural loss" appearing in the developer's findings. Despite this, such impacts have not been adequately integrated into the main application or given the appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. It is crucial to obtain a complete understanding of social, economic, and health impacts for developments of this scale, particularly when community character and functioning may be at stake. The application fails to provide a complete evidential basis for assessing the balance between benefits and harms due to the absence of the full dataset.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm; however, the available evidence indicates existing adverse effects that have not been fully disclosed. Without the

complete assessment, demonstrating compliance with this policy is not possible.

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

In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The introduction of large-scale turbines near the shoreline would establish a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape. The assessment conducted does not accurately reflect the magnitude of this visual change, with the scale and proximity of the turbines set to dominate views from residential areas, historic sites, and popular coastal locations. This would have a detrimental impact on visual amenity, eroding the defining qualities of naturalness and remoteness, while failing to convey the significance of such impacts within this sensitive landscape context.

Concerns regarding the methodology used for selecting and presenting visual viewpoints are also evident. Evidence indicates that these viewpoints may inadequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which casts doubt on the assessment's reliability.

Moreover, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape, connected visually and spatially to the Atlantic horizon. By treating these assets in isolation, the assessment fails to recognise their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would disrupt these relationships, fundamentally altering the context in which these heritage assets are experienced and severing their connection to the natural horizon. This signifies not merely a visual impact but also a broader cultural and spatial harm that has not been properly considered in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of the proposed changes contradicts the requirement to protect landscape character, visual

amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further undermines claims of policy compliance.

Finally, it is apparent 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 changes are fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures. Overall, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage, thereby preventing a reliable evaluation and reinforcing the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to adequately assess construction and pollution risks, presenting significant concerns about potential environmental impacts. It entails extensive seabed preparation and installation within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application leans heavily on future mitigation and contingency measures that will be formulated post-consent, which hinders any meaningful evaluation of their potential effectiveness.

Given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and essential habitats susceptible to sediment disturbance and contamination, this approach raises serious alarms. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate information on prevention, control, or monitoring strategies.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. The absence of robust modelling and well-defined management strategies makes it impossible to ascertain the potential extent, duration, or ecological consequences of these impacts. This uncertainty extends to the possible effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

Compounding these issues is the failure to include detailed emergency response procedures. By postponing the development of contingency plans to a later stage, the application obstructs the evaluation of whether suitable safeguards will be in place for pollution events. This situation introduces procedural risks and hampers the competent authority's ability to assess the environmental protection measures prior to the final decision.

From a regulatory standpoint, the postponement of vital environmental safeguards is at odds with the requirements stipulated by the Environmental Impact Assessment regime. It is essential to assess likely significant effects and mitigation before consent is granted. The absence of such critical information means a lawful determination cannot be achieved. Moreover, the application does not demonstrate compliance with

existing policy requirements related to environmental protection and water quality.

In conclusion, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment fundamentally inadequate. These shortcomings prevent a thorough evaluation of construction and pollution risks, further corroborating the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application presents an inadequate assessment of fisheries and marine life. It fails to offer a robust evaluation of both ecological and socio-economic impacts, raising immediate concerns about the potential disruption to these critical uses and habitats.

A primary flaw lies in the assumption that fishing activity can be displaced without any consequences. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of withstanding additional pressure. This significant omission poses risks of overfishing in other areas and could lead to wider economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the implications for fisheries and local livelihoods remain obscure.

The proposal introduces serious risks to marine species, notably due to underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is likely to disrupt species such as dolphins across considerable distances. The projected impact on a notable portion of the local bottlenose dolphin population raises urgent concerns, yet the application downplays these effects, lacking sufficient supporting evidence.

There is a troubling inconsistency in the application that acknowledges the need for licences to permit harm to European Protected Species, while simultaneously characterising impacts as negligible. This contradiction undermines the credibility of the assessment and raises significant questions about compliance with the Habitats Regulations, especially where anticipated harm would require 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 is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not comply with the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any assertion that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly inadequate and does not take into account the full range of impacts resulting from what constitutes a single integrated project. The offshore turbines and the onshore works are inherently linked; however, they are evaluated separately. This results in a disjointed approach that conceals the actual magnitude of the environmental and socio-economic consequences.

Included in the onshore components are cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure traversing sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of the assessment of onshore impacts impedes a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be considered collectively; nevertheless, the division of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain poorly understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not indicate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, resulting in a clear evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this matter or demonstrate that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which brings into question the deliverability and lawful execution of the project.

From a policy standpoint, the inability to assess the project as a cohesive whole and demonstrate the protection of peatlands, habitats, and land use interests is at odds

with the National Marine Plan and National Planning Framework 4. The failure to prove that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The 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 application presents significant deficiencies in the assessment of tourism impacts, notably neglecting to analyse the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantified analysis regarding how the introduction of large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution from tourism.

Since 2017, tourism has experienced substantial growth, increasing from £65 million to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite this positive trend, the application fails to model the potential effects of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Such analysis is vital to determine whether the proposed development would result in a net economic benefit or jeopardise a thriving sector.

Moreover, the assessment overlooks the critical role of environmental quality in sustaining tourism, particularly how unspoiled landscapes and dark skies enhance visitor experiences and contribute to burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a notable void in understanding the potential impacts on this recognised and expanding segment of the local economy.

The implications of failing to assess tourism impacts extend beyond the immediate economic factors, affecting employment, local businesses, and community sustainability within a region that has limited economic diversification. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been thoroughly evaluated, which is a requirement under the Islands (Scotland) Act 2018.

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

In summary, the failure to quantify tourism impacts, to assess the environmental factors influencing visitor behaviour, and to acknowledge the island's economic dependency leads to a significant evidential gap. This gap undermines any robust evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the essential criteria for sustainable development as required by statutory duties, national policy, and evidential standards. It mirrors the fundamental concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. This current application, while submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still does not adequately address these issues.

There are significant shortcomings in the evidential basis for the application. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope and reliance on unspecified mitigation measures. Additionally, there are omissions concerning key impact pathways, including effects on nocturnal wildlife, the complete onshore infrastructure, and potential tourism implications. As a result, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of likely significant effects or any residual impacts.

The application also presents clear procedural failures. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a material omission. These deficiencies obstruct the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

This proposal contradicts the directives of National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. Furthermore, the absence of tourism impact modelling means that a net economic benefit cannot be evidenced. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and potentially significant. Assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The required evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for

determination. The extent of informational deficiencies, coupled with conflicts in policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. The competent authority is urged to either refuse consent based on these grounds or invoke relevant regulatory provisions to require the submission of the necessary information.

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

Additional Comments

I am originally from the Island of Lewis and consider it my “ home”. Most of my extended family still live there. There has been little consultation or ensuring that the impact on the area is fully understood. I wholly object to the blot and impact on the environment that the wind turbines and the infrastructure to maintain them is going to be. The lack of any form of remuneration to the island people is a travesty that cannot be tolerated. The cost of living for islanders is already enormous and if there is any question that these turbines or any part of their infrastructure will deplete house prices, affect tourism or the quality of life for islanders then islanders should be given assurances of how they will be compensated. The environmental impact for birds, migrating patterns, sea life is huge. I am already aware of the impact and damaging changes that wind farms have had on birds around our family Croft and it has been devastating. I wholeheartedly object to this project.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 303C31D9

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 appropriate marine licensing and Environmental Impact Assessment frameworks. The objection stems from a thorough review of the Environmental Impact Assessment Report and related documents, which reveal significant deficiencies across various domains including planning, environmental considerations, cultural implications, and procedural integrity. The development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The unprecedented scale and proximity of the proposed development raise serious questions regarding its alignment with statutory requirements, national policy, and the tenets of sustainable development. Central to this objection is the assertion that the application lacks a sufficient evidential basis necessary for lawful approval. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, several key aspects of the proposal remain undefined. The flexible design framework employed complicates the assessment of likely significant effects, and the proposed mitigation measures, which have not yet been specified, inhibit the evaluation of their potential effectiveness. Consequently, the available documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, thereby undermining claims of negligible or non-significant effects that lack robust evidential support.

There are evident and substantial conflicts with established policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not convincingly demonstrate compliance with national obligations to protect biodiversity, address climate considerations, and uphold environmental integrity. Such conflicts are critical to the statutory tests necessary for securing consent and impede the competent authority's ability to ascertain the development's acceptability within policy frameworks.

The scale of the proposed development is without precedent in this area, featuring large turbines located close to the shoreline. This raises significant concerns about landscape capacity, visual impact, and overall environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy violations illustrate that the application is fundamentally incomplete and incapable of supporting a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and lacks a comprehensive, transparent, and dependable account of the potential environmental impacts associated with the proposal. The adoption of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for turbines, introduces considerable uncertainty. This uncertainty hinders a consistent application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the projected impacts may not accurately reflect the development that is ultimately realised, which obstructs both public understanding and the ability of the competent authority to grasp the full extent of the environmental consequences.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be established. This approach seeks consent on the premise that any environmental harm will be rectified at a subsequent stage, which complicates a meaningful evaluation of their effectiveness and the assessment of residual impacts. Such a postponement of critical information to post-consent phases is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and their mitigation must be distinctly identified before a determination is made.

Significant evidential deficiencies also exist within the application, marked by gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than robust, site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially in instances where conclusions regarding negligible or non-significant effects are drawn without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot satisfy statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been comprehensively evaluated or that suitable safeguards are in place.

In summation, the reliance on an undefined design envelope, the absence of specific mitigation measures, and the notable gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects, leaving the competent authority incapable of making a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed application lacks a rigorous assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured comparison of realistic alternatives based on their environmental effects, it provides a narrative that reflects the project's evolution. This approach does not adequately show that less harmful options have been identified, assessed, and chosen over more damaging solutions.

Furthermore, there is an absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not convincingly show that the developer has seriously contemplated positioning turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. The West Lewis coastline's sensitivity and the critical nature of proximity to shore in assessing impact highlight the significance of this analysis. The lack of such investigation prevents any justification that the proposed siting represents the least damaging option.

The shortcomings also extend to cable routing and landfall assessments, where there is inadequate evidence that alternative routes have been thoroughly considered to minimise impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The failure to establish a clear avoidance strategy, coupled with the absence of comparative analysis, indicates that mitigation by design has not been implemented; rather, the application seems to rely on post-design mitigation measures. Consequently, the proposal does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a significant deviation from the established mitigation hierarchy, preventing the competent authority from assessing whether less harmful and more suitable alternatives are available.

From a policy standpoint, these inadequacies undermine compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, contributing to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly lacking, providing neither a complete nor a reliable understanding of ecological receptors within the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the baseline data is inadequate, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, this assessment does not deliver a sound evidential basis for assessing potential impacts.

A notable shortcoming is the assessment of otters, a European Protected Species. The application fails to properly acknowledge and evaluate their active use of coastal zones

for foraging and movement. The oversight of their core foraging range and behavioural patterns results in a failure to adequately assess the potential effects of construction disturbances, noise, and increased activity. This oversight undermines any conclusions regarding the absence of significant effects on the species.

Further concerns are raised regarding the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence. This is especially evident when compared to established land-based observations indicating frequent use of these waters. The omission of such critical data results in an incomplete baseline and further weakens the reliability of the conclusions drawn.

The methodological flaws highlighted mean that assertions of negligible or non-significant effects rely on assumptions rather than strong evidence. Additionally, the lack of adequate baseline data hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the actual level of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, characterised by significant gaps in evidence and inconsistencies that undermine its conclusions. Located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, where internationally important seabird populations are already in decline, the application fails to convincingly demonstrate that these species will remain unaffected. There is an evident lack of robust evaluation regarding the implications of displacement, collision risk, and habitat loss for these birds.

A notable contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is typically warranted only when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn lack adequate support from the underlying evidence.

The assessment does not sufficiently address the potential impacts on seabird species linked to protected sites, such as the Lewis Peatlands and St Kilda. The critical significance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches introduces considerable uncertainty, especially for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in instances where baseline data is insufficient and behavioural responses are inadequately understood.

The placement of turbines within a recognised migratory corridor poses an additional and serious risk, effectively creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. There is inadequate assessment of the long-term consequences of sustained mortality within this corridor, nor is there a thorough examination of the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential standards required to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This triggers the precautionary principle and precludes a lawful conclusion in support of consent.

Moreover, the identified deficiencies reflect a non-compliance with the 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 lacks reliability due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings inhibit a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development lacks a thorough assessment of cultural heritage and community identity, treating the West Lewis coastline merely as a collection of isolated, static assets. This view fails to acknowledge the area as a living cultural landscape where environment, language, tradition, and community are deeply intertwined.

In particular, the treatment of significant sites such as the cemeteries at Dalmore, Bragar, and Barvas is a major shortcoming. These sites are not merely historical features; they serve as active places of burial and spiritual practice. However, the assessment categorises them without considering their ongoing use and the implications of development on their surroundings. This misrepresentation results in an

incomplete evaluation of the cultural effects, neglecting their importance in community life.

Additionally, the assessment overlooks intangible cultural heritage, including the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity but are entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the development.

Moreover, there are notable concerns surrounding community rights and engagement. The Gaelic-speaking population, which embodies the distinct characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The absence of meaningful engagement compromises the validity of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

A critical procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community, preventing a lawful determination of the proposal.

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

Ultimately, the collective failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application lacks a sufficient foundation for determining the true cultural cost of the proposed development.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The inadequacy of the assessment concerning social impacts, health, and wellbeing is evident, particularly in terms of transparency necessary for a lawful evaluation. The developer has engaged in a Social Impact Assessment, which included focus groups with local residents, but the full report remains unpublished. This absence of information creates a considerable evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks highlighted in the developer's own research.

Summaries that are available suggest that residents are already facing quantifiable stress, anxiety, and concern linked to the scale and closeness of the proposed development. These effects are based on direct engagement, indicating they are not

mere speculation. However, without the full assessment, proper scrutiny of these findings is impossible, limiting the capacity to evaluate their significance during the decision-making process.

Moreover, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” specifically noted in the developer’s findings. Despite the recognition of these impacts, they have not been adequately incorporated into the primary application nor afforded the necessary consideration. The lack of disclosure surrounding the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency has further repercussions for the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this nature, especially where community character and functioning might be affected. By failing to provide the complete dataset, the application does not present a full evidential basis for weighing the benefits against the potential harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments are required to foster positive health outcomes and avoid detriment; however, the available evidence highlights existing negative effects that have not been fully revealed. Without access to the complete assessment, the application cannot prove compliance with this policy.

The procedural implications of this situation are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation due to the lack of access to the full Social Impact Assessment. This constitutes a material omission within the application, resulting in a failure to satisfy the evidential requirements stipulated by the Environmental Impact Assessment regime.

Collectively, the failure to disclose the complete Social Impact Assessment, alongside evidence of existing adverse effects, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines in proximity to the shoreline would impose a continuous and prominent industrial presence, leading to a fundamental change in this character and resulting in an irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts does not adequately represent the scale of this change or consider the sensitivity of the receiving environment.

The visual implications of the proposed turbines are significant, as their scale and

proximity would dominate views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not accurately convey the extent of this impact, nor its significance in the context of such a sensitive landscape.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This creates a risk that the visual impact has been understated, calling into question the reliability of the assessment.

Moreover, the assessment inadequately considers the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, interconnected through visual and spatial relationships with the Atlantic horizon. By treating these assets in isolation, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape threatens to sever these connections, altering the context in which these heritage assets are experienced and disrupting their link to the natural horizon. This not only poses a visual impact but also inflicts broader cultural and spatial harm that the application has not properly assessed.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which seeks to protect natural places and historic assets. The proposed scale of change is incompatible with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to adequately assess construction and pollution risks, presenting significant concerns about potential environmental impacts. It entails extensive seabed preparation and installation within a high-energy Atlantic

environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application leans heavily on future mitigation and contingency measures that will be formulated post-consent, which hinders any meaningful evaluation of their potential effectiveness.

Given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and essential habitats susceptible to sediment disturbance and contamination, this approach raises serious alarms. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate information on prevention, control, or monitoring strategies.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. The absence of robust modelling and well-defined management strategies makes it impossible to ascertain the potential extent, duration, or ecological consequences of these impacts. This uncertainty extends to the possible effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

Compounding these issues is the failure to include detailed emergency response procedures. By postponing the development of contingency plans to a later stage, the application obstructs the evaluation of whether suitable safeguards will be in place for pollution events. This situation introduces procedural risks and hampers the competent authority's ability to assess the environmental protection measures prior to the final decision.

From a regulatory standpoint, the postponement of vital environmental safeguards is at odds with the requirements stipulated by the Environmental Impact Assessment regime. It is essential to assess likely significant effects and mitigation before consent is granted. The absence of such critical information means a lawful determination cannot be achieved. Moreover, the application does not demonstrate compliance with existing policy requirements related to environmental protection and water quality.

In conclusion, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment fundamentally inadequate. These shortcomings prevent a thorough evaluation of construction and pollution risks, further corroborating the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

A critical flaw in the assessment is the assumption that fishing activities can simply be

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The failure to assess the project as a whole raises significant concerns regarding the impacts on land use and legal rights. The routing of infrastructure through active croft land introduces potential conflicts, and the application lacks evidence that necessary consents or processes have been initiated. This absence of documentation leads to questions about the deliverability and lawful implementation of the project.

Furthermore, the assessment of onshore infrastructure is materially incomplete, which

obscures the true scale of environmental and socio-economic effects. The offshore turbines and onshore works are intrinsically linked, yet they are assessed separately, resulting in a fragmented approach that fails to consider the cumulative effects of the project. By excluding or deferring the assessment of onshore impacts, a proper evaluation of cumulative effects on peatlands, habitats, and communities cannot be achieved.

The onshore elements involve construction activities such as cabling across protected moorland and the establishment of a substation near Stornoway. These works require excavation across deep peat areas, particularly within Barvas Moor, which is both a significant carbon store and an ecologically sensitive habitat. The application does not provide a comprehensive assessment of these impacts, preventing a full understanding of the project's overall environmental footprint.

There are also considerable risks to sensitive habitats, including machair systems and peatland environments, which are subject to policy protection. The application fails to demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been applied, creating a clear evidential gap regarding biodiversity protection.

Additionally, the proposal raises concerns about carbon balance. Disturbance of peatland releases stored carbon, potentially creating a carbon debt that contradicts the objectives of renewable energy development. The application does not adequately address this issue or demonstrate that the overall carbon balance remains beneficial.

From a policy perspective, the separation of project components and the inability to demonstrate protection of peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The lack of evidence to show that impacts can be avoided or mitigated undermines the application and highlights its incompleteness and unreliability, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

The application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This is a significant oversight, especially considering the increasing importance of dark skies to the region's identity and the growth of tourism sectors like astro-tourism. The failure to assess these impacts represents a clear gap in the overall landscape and environmental evaluation.

Furthermore, there is no consideration of how the proposed lighting will affect

nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and raise the risk of collisions. The application lacks any lighting impact assessment or phototaxis study, leaving unaddressed how aviation lighting may influence these species or contribute to increased mortality rates.

This issue is aggravated by the reliance on daytime survey data for the ornithological assessment, which fails to account for nocturnal activities or related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, but this concern has not been examined. The lack of site-specific night-time data results in a critical deficit in understanding the ecological impacts.

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

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

Overall, 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 unable to support 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 Spiorad na Mara Offshore Wind Farm proposal demonstrates significant shortcomings in its adherence to sustainable development principles as required by statutory duties, national policy, and evidential standards. The application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, specifically regarding the unacceptable scale of industrialisation. This current application is submitted under a more robust policy framework, which emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis presented in the application is neither complete nor reliable, featuring critical deficiencies in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the omission of significant impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks comprehensiveness, failing to provide a full understanding of likely significant effects or residual impacts.

Furthermore, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties established under the Islands (Scotland) Act 2018. In addition, the failure to present the complete Social Impact Assessment constitutes a significant omission, hindering the competent

authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, which in turn renders the application unsuitable for consideration.

In addition to these procedural issues, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, fails to validate 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 both offshore and onshore components has not been appropriately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks linked to the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and impeding any lawful conclusion regarding the acceptability of impacts.

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

Considering all these factors, the application is both procedurally and substantively inadequate for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is thus urged to either refuse consent based on these grounds or to invoke relevant regulatory provisions to require the submission of the missing information.

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

Additional Comments

I am 82 and do not currently have the energy to express my full objections in writing. I have read and digested much and have decided to include the maximum selections supplied for me. Please believe me I am 100% against this.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: D9D24358

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is grounded in a comprehensive review of the Environmental Impact Assessment Report and its associated documentation, which reveals significant deficiencies across material planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, characterised by an Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. The scale and design of the proposal, along with its proximity to the shoreline, raise fundamental issues regarding its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. It is noted that critical environmental data is absent, with baseline information being both limited and inconsistent. Key components of the proposal remain unclear, and the employment of a flexible design framework inhibits a precise understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive or informed understanding of the potential environmental, cultural, or community impacts. Assertions regarding negligible or non-significant effects are unsupported by adequate evidence.

There exist pronounced and substantial conflicts with policy. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory assessments required for consent and weaken the capacity of the competent authority to determine the acceptability of the development from a policy perspective.

The unprecedented scale of the proposal introduces large turbines in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental impact. In summary, the combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and does not offer a comprehensive or dependable account of the potential environmental effects associated with the proposal. The application's reliance on a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, introduces significant uncertainty. This ambiguity undermines the assessment's integrity and may lead to a misrepresentation of the actual impacts of the development, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of the environmental consequences.

Furthermore, the application places considerable emphasis on unestablished mitigation measures, monitoring strategies, and management plans. Seeking consent under the assumption that environmental harm will be resolved later obstructs meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly delineated before any determination is made.

Additionally, the report exhibits serious evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies result in uncertainty regarding the scale and significance of the impacts, particularly where negligible or non-significant effects are asserted without robust supporting evidence. The lack of adequate information hampers a thorough understanding of cumulative and worst-case impacts, generating scientific uncertainty that fails to align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, as it does not eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to National Planning Framework 4, including standards related to biodiversity protection and environmental integrity, since it cannot prove 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 significant gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in the assessment of alternatives, which is materially inadequate and fails 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, it offers

a narrative account of project evolution. This method does not prove that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

The lack of a transparent and evidence-based comparison extends to alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has seriously contemplated placing turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. Considering the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact, the failure to include this analysis prevents any determination that the proposed siting is the least damaging option.

Insufficient evidence also characterises the assessment of cable routing and landfall, where alternatives have not been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The absence of a clear avoidance strategy and a comparative analysis signifies that mitigation by design has not been effectively implemented, resulting in an overreliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This 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. In the absence of a thorough alternatives assessment, it is impossible to conclude that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy 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 assessment constitutes a material omission that contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is insufficient and fails to provide a reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is a sensitive and biologically active marine system. However, the baseline data is incomplete and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment does not offer a strong evidential basis for evaluating potential impacts.

The application notably overlooks otters, which are a European Protected Species, failing to recognise and assess their active use of coastal areas for foraging and movement. The lack of consideration for their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity have not been properly evaluated. This diminishes the validity of any

conclusions drawn about the absence of significant effects on otters.

Additionally, there are significant deficiencies in the assessment of basking sharks, as the reliance on aerial surveys introduces a notable detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of basking sharks when compared to established land-based observations that show frequent usage of these waters. The failure to incorporate or appropriately consider such data leads to an incomplete baseline and weakens the reliability of the conclusions provided.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. However, the ornithological assessment associated with the application is significantly flawed, presenting serious gaps in evidence and internal contradictions that undermine its findings. The development is sited within crucial foraging areas and migratory pathways, yet the assessment fails to adequately evaluate the risks of displacement, collision, or habitat loss for these species.

The application presents a fundamental contradiction, stating that there are no significant adverse effects while simultaneously making 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, suggesting that its conclusions lack proper support from the available evidence. Furthermore, the assessment does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It inadequately considers the significance of these feeding grounds and relies on modelling approaches that introduce uncertainty, particularly for severely declining species like

Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and behavioural responses remain poorly understood.

Moreover, the placement of turbines within a recognised migratory corridor poses an additional and serious risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality in this corridor, along with potential impacts on species with limited global populations, are not sufficiently assessed in the application.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and modelling constraints indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, thereby precluding a lawful conclusion in support of consent. The identified deficiencies also demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to prove that internationally important seabird populations will not face adverse effects places the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply interwoven. It adopts an overly simplistic view by treating cultural heritage merely as isolated and unchanging assets, rather than as dynamic elements with ongoing social, cultural, and spiritual significance within the community.

Cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites for burial and spiritual practices, are mischaracterised as static features. This oversight neglects their continuous use and meaning, as well as the potential effects of development on their surroundings. As a result, the evaluation of cultural impacts remains fundamentally incomplete and overlooks the vital role these sites play in community life.

Moreover, the absence of consideration for intangible cultural heritage, such as the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment, is a critical shortcoming. These elements are essential to the identity of the area but have been completely disregarded in the assessment, leading to a failure in understanding the true cultural implications of the development.

There are serious concerns regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been consulted through a Free, Prior and Informed Consent process. This lack of meaningful engagement raises questions about the legitimacy of the assessment and contradicts established principles that promote participation in decisions impacting cultural and environmental interests.

Additionally, there is a significant procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission means the competent authority cannot legally assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

These oversights also place the proposal at odds with the National Planning Framework 4, specifically concerning the protection of historic assets and spaces. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices clearly deviates from policy obligations.

Ultimately, the inability to adequately assess living heritage, intangible cultural value, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the proposed development remain improperly evaluated, and the application lacks a sound basis for determining the genuine cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is essential

for developments of this magnitude, especially when community character and functioning may be adversely affected. The omission of the full dataset results in an application that does not provide a complete evidential basis for weighing benefits against harm.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly lacking, failing to capture the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic views, undeveloped nature, and pronounced remoteness. The introduction of large-scale turbines near the shoreline would create an unbroken and prominent industrial presence, fundamentally changing this character and leading to a permanent alteration of the landscape.

Moreover, the application does not fully portray the magnitude of this visual change. Given the size and proximity of the turbines, they would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately articulate this level of impact or its importance within the context of such a delicate landscape.

There are also serious methodological issues regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the extent of visual impact has been underestimated, thereby compromising the reliability of the assessment.

Another significant shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such

as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment regards these as separate entities rather than acknowledging their interconnections, leading to an incomplete appraisal of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which pertains to the protection of natural environments and historic assets. The scale of proposed changes is inconsistent with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy adherence.

It is evident that the impacts identified cannot be effectively mitigated. The scale, height, and proximity of the turbines would render their presence 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 does not accurately depict the impact scale, the environment's sensitivity, or the interdependent nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks in this proposal is inadequate and lacks the necessary detail for a thorough assessment of potential environmental impacts. The project entails significant seabed preparation and installation activities in a dynamic Atlantic environment, yet it does not present well-developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on future mitigation and contingency measures that will be prepared after consent is granted, which hampers any meaningful assessment of their viability or effectiveness.

This reliance on unspecified future actions raises serious concerns, particularly considering the sensitivity of the environment at the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide adequate detail on how these risks will be managed, controlled, or monitored.

There remains a degree of uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disruption and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to

gauge the extent, duration, or ecological repercussions of these impacts. This uncertainty also pertains to possible effects on marine species and habitats previously identified as sensitive in the broader assessment.

Moreover, the lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the proposal restricts the evaluation of whether suitable measures are in place to address pollution incidents. This introduces procedural risks and diminishes the ability of the competent authority to assess environmental protection strategies before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation strategies be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. However, the application for development does not adequately evaluate the ecological or socio-economic impacts, particularly concerning these existing marine uses and habitats. It fails to demonstrate that they can be protected or maintained without significant disruption.

A major concern is the assumption that fishing activities can simply be displaced without any consequences. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to manage the additional pressure. This omission is critical because it raises the risk of overfishing in other areas and poses potential economic ramifications for the local fishing fleet. Without a thorough and evidence-based assessment, the impacts on fisheries and local livelihoods cannot be accurately understood.

Moreover, the proposal poses considerable risks to marine species, especially through the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended timeframe is likely to cause disturbances across large distances, adversely affecting marine life, including species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is particularly concerning, yet the application minimises the importance of these effects without providing sufficient supporting evidence.

There is a notable inconsistency within the application; while it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment does not consider the cumulative impacts that result from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a detailed evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents an incomplete assessment of onshore infrastructure, failing to consider the full scope of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are interlinked; however, the assessment treats them separately, which results in a fragmented analysis that obscures the overall environmental and socio-economic effects.

Significant risks are posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application has not adequately demonstrated that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating an evidential gap regarding biodiversity protection.

Moreover, the onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure that traverses sensitive landscapes. These works involve excavation in areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The failure to provide a comprehensive assessment of these impacts inhibits a complete understanding of the project's overall environmental footprint.

The lack of consideration for cumulative effects is evident, as the application has either excluded or deferred assessment of onshore impacts. The Environmental Impact

Assessment process necessitates that all components of a project be evaluated collectively. The fragmented treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain unclear.

Concerns are also raised regarding the carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application has not sufficiently addressed this matter or shown that the overall carbon balance remains advantageous.

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

From a policy standpoint, the failure to assess the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines 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 result in this part of the application being incomplete and unreliable, which prevents lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a substantial oversight within 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 potential. The proposed development would introduce permanent red aviation lighting, creating a continuous and intrusive "wall of light" that would drastically change the night-time atmosphere.

There has been no examination of how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This neglect is particularly troubling given the significance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The failure to evaluate these impacts highlights a clear deficiency in the overall landscape and environmental assessment.

More importantly, the proposal does not consider the effects on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can lead to disorientation and a higher risk of collisions. The application lacks a lighting impact assessment or phototaxis study, meaning it does not address how aviation lighting could affect these species or increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities or their associated risks. Kittiwakes, for instance, may forage or migrate at night and are equally susceptible to disorientation caused by artificial lighting, yet this risk remains unexamined. The lack of specific night-time data creates a critical void in understanding ecological impacts.

Without an evaluation of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse consequences. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the preservation of natural areas and environmental quality. It also detracts from the comprehensive evaluation of landscape and seascape effects, as night-time character is a fundamental aspect of the environment.

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

TOURISM

The assessment of tourism impacts is notably inadequate and does not sufficiently evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or overall economic contributions.

Tourism has experienced significant 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 model the potential impacts of seascape industrialisation and environmental quality loss on Tourism Gross Value Added or broader economic resilience. Without this analysis, it remains unclear whether the development would yield a net economic benefit or potentially harm a well-established and expanding sector.

The assessment neglects to address the role of environmental quality in enhancing tourism, particularly the importance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, resulting in a considerable gap in understanding the impacts on a recognised and growing aspect of the local economy.

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

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

Ultimately, the lack of quantification of tourism impacts, the failure to assess environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency result in a significant evidential gap. This inadequacy prevents a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the 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

It deeply saddens me to think that this monstrosity could actually go ahead. Our beautiful coastline, our natural environment, unspoiled views, never mind the massive, detrimental impact on sea life & birds that all mean so little to the people that think this is a viable project. Please leave our beautiful little island as nature intended and let us live as we have done, peacefully embracing the beauty surrounding us.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: D5774C5A

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and its supporting documentation has revealed significant material deficiencies related to planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

Crucially, the application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, with baseline information that is both limited and inconsistent. Furthermore, key elements of the proposal are not clearly defined. The application employs a flexible design framework that obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures renders it impossible to assess their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust supporting evidence.

There are evident and serious policy conflicts. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate considerations, and environmental integrity. These conflicts directly challenge the statutory tests needed for consent, undermining the ability of the competent authority to deem the development acceptable in policy terms.

Additionally, the unprecedented scale of the proposal in this location, with large turbines placed in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not offer a clear or dependable account of the potential environmental effects of the proposal. The application employs a flexible Project Design Envelope without committing to specific turbine dimensions or layouts, which creates considerable uncertainty. This flexibility hinders the ability to apply a worst-case scenario consistently and compromises the assessment's integrity. As a result, the impacts presented may not accurately represent the development that will ultimately be built, which limits both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

Additionally, the application depends significantly on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent based on the expectation that environmental harm will be addressed later undermines any meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information to stages following consent is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates clear identification of likely significant effects and mitigation before determination.

There are substantial evidential shortcomings, such as gaps in baseline data and limitations in methodology, alongside reliance on assumptions instead of site-specific evidence. Consequently, there is uncertainty regarding the scale and significance of impacts, especially where findings of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

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

In summary, the combination of an undefined design envelope, unspecified mitigation, and deficiencies in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and thorough assessment of environmental effects and indicate that the competent authority cannot make a determination based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured comparison of realistic alternatives based on their environmental effects. This approach fails to show that less harmful options have been properly identified, assessed, and chosen over more damaging solutions. The assessment of alternatives is

materially inadequate and does not meet the statutory requirements of the Environmental Impact Assessment regime.

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline is sensitive, and the proximity to shore significantly affects impact determination. The absence of this analysis hinders any conclusion about whether the proposed siting is the least damaging option.

The deficiencies also include cable routing and landfall assessment, with insufficient evidence that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant areas 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 post-design measures.

Due to these shortcomings, the application does not prove that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and obstructs the competent authority from assessing whether less harmful and more suitable alternatives exist. Without a robust assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to adequately meet the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4. There is a significant deficiency in the assessment of marine ecology and protected species, which provides an unreliable understanding of ecological receptors within the sensitive West Lewis coastal environment. The methodologies used are inadequate and do not sufficiently capture crucial aspects of species presence, behaviour, and habitat use, thereby undermining the evidential basis for evaluating potential impacts.

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

effects on otters.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration presents significant deficiencies in its ornithological assessment, which is flawed due to substantial gaps in evidence and internal contradictions that challenge its conclusions. Situated on the west coast of the Isle of Lewis, an area that supports seabird populations of international importance, the proposal fails to adequately demonstrate that these species, many of which are already in decline, will not experience adverse impacts. The proposed development is located within crucial foraging areas and migratory corridors, yet the assessment does not thoroughly evaluate the risks of displacement, collision, or habitat loss for these birds.

A notable contradiction within the application arises when the developer asserts that there will be no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is intended for situations where significant harm is anticipated. This inconsistency casts doubt on the validity of the assessment and suggests that its conclusions lack support from the evidence provided. The assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The critical nature of these feeding grounds is inadequately considered, and reliance on modelling methods adds uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Moreover, the methodologies employed are likely to underestimate mortality rates, particularly given the incomplete baseline data and the limited understanding of behavioural

responses.

The placement of turbines within a known migratory corridor introduces significant risks by potentially obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The application lacks a comprehensive assessment of the long-term consequences of sustained mortality in this corridor and the implications for species with small global populations.

From a regulatory standpoint, the application does not meet the evidential standards required to confirm no adverse effects on the integrity of protected sites. The contradictory findings, coupled with data gaps and limitations in modelling, mean that the necessary standard of proof beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, making a lawful conclusion in favour of consent unattainable.

Furthermore, the identified deficiencies represent a failure to adhere to National Planning Framework 4, which relates to the protection of biodiversity and natural assets. The inability to prove that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable, undermined by methodological weaknesses and insufficient evidence. These shortcomings hinder a comprehensive evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for a determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the West Lewis coastline's cultural heritage and community identity is fundamentally flawed. It overlooks this area as a living cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead, the application adopts a simplistic view, treating heritage as a collection of isolated and unchanging assets without acknowledging their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet they are mischaracterised as static features. The assessment fails to consider their continued use and meaning, along with the potential impact of development on their settings. This oversight leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the application does not take into account intangible cultural heritage, which includes the Gaelic language, local traditions, and the long-standing relationship between the community and the coastal environment. These elements are crucial to the area's identity and are glaringly absent from the assessment, representing a significant shortcoming. The cultural impacts of the development cannot be adequately understood without these considerations.

There are additional concerns related to community rights and engagement. The Gaelic-speaking population has a distinct cultural identity recognised as that of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been observed. The lack of meaningful engagement undermines the assessment's legitimacy and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

A crucial procedural failure is the omission of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thus preventing a lawful determination.

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

Collectively, the neglect to assess living heritage, intangible cultural value, community rights, and legal obligations results in a substantial evidential gap. The cultural impacts of the proposed development have not been properly evaluated, and the application fails to provide a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

Moreover, there is clear evidence that this proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Unfortunately, these detrimental impacts have not been adequately reflected in the primary application or given the necessary consideration. The withholding of the

full Social Impact Assessment conceals the actual human and social costs of the project.

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

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

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material flaw within the application, failing to satisfy the evidential prerequisites of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking, failing to capture the true extent of the changes anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline is defined by its open view of the Atlantic and its undeveloped, remote nature. The proposed large-scale turbines would intrude upon this landscape, establishing an industrial presence that would irrevocably alter its character and result in a permanent transformation.

Furthermore, the evaluation does not accurately depict the magnitude of the visual alterations that would occur. Given the scale and proximity of the turbines, they would dominate the views from residential areas, historic locations, and popular coastal spots. This dominance would have a detrimental effect on visual amenity and diminish the essential qualities of naturalness and remoteness that define this area. The assessment's failure to adequately address the significance of these impacts in such a sensitive landscape is concerning.

Methodological flaws have also been identified regarding the selection and

presentation of visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most severe scenarios, especially concerning critical cultural heritage sites and valued landscapes. This oversight raises the possibility that the true scale of the visual impact has been underestimated, calling into question the reliability of the assessment's findings.

Additionally, the assessment does not adequately consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context, linked visually and spatially to the Atlantic horizon. Treating these assets as isolated entities neglects their interdependence, resulting in an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context within which heritage sites are appreciated and breaking their link to the natural horizon. This represents not only a visual impact but also a cultural and spatial harm that the application has not sufficiently addressed.

From a policy standpoint, the proposal contradicts the guidelines outlined in the National Planning Framework 4, particularly regarding the protection of natural landscapes and heritage sites. The extent of the proposed changes conflicts with requirements to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further compromises the proposal's compliance with established policy.

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

In summary, 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 trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the need to protect this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

This dependence on unspecified future actions raises significant concerns, particularly

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

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing industry. However, the application does not provide a robust evaluation of the ecological or socio-economic impacts on these critical resources. A significant concern is the flawed assumption that fishing activity can be moved without consequences. There is no evidence presented that alternative fishing grounds are available or capable of absorbing additional pressures, which is vital information. This lack of clarity poses a risk of overfishing in other areas and could have severe economic repercussions for the local fishing fleet. An evidence-based assessment is essential to understand the true impacts on fisheries and livelihoods.

The proposal also presents considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling

over prolonged periods is expected to create disturbances that could affect marine life over large distances, including local dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population raises alarming questions, yet the application minimises the importance of these potential effects without adequate supporting evidence.

There is a troubling inconsistency in the application itself, acknowledging the need for licences to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction undermines the validity of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially when harm is anticipated to an extent that would require legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is significantly inadequate and does not take into account the complete range of impacts resulting from this integrated development. The offshore turbines and onshore works are closely interrelated, yet they are evaluated separately, leading to a fragmented approach that obscures the true extent of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland and the construction of a substation in proximity to Stornoway, as well as the necessary access infrastructure through delicate landscapes. These activities entail excavation across deep peat areas, particularly in Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. Without a thorough assessment of these impacts, there is no comprehensive understanding of the project's overall environmental footprint.

The decision to exclude or postpone the assessment of onshore impacts hampers the

ability to properly evaluate cumulative effects. The Environmental Impact Assessment process necessitates that all elements of a project be considered in conjunction; however, the distinct assessment of offshore and onshore components results in a lack of clarity regarding the combined effects on peatlands, habitats, and local communities.

There are also considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The current application fails to show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been taken, indicating a significant evidential gap in relation to biodiversity protection.

Concerns about carbon balance are also pertinent. Disturbing peatland has the potential to release stored carbon, which could lead to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter nor does it prove that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. There is no evidence provided in the application that the requisite consents or processes have been initiated, which brings into question the project's feasibility and lawful implementation.

From a policy standpoint, the failure to assess the project holistically and to demonstrate adequate protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be mitigated or avoided undermines the application's credibility.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is missing an assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that can be seen from long distances, creating a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important due to the value of dark skies for the local identity and the growing tourism sector focused on astro-tourism. The lack of consideration for these impacts

represents a clear gap in the overall assessment of the landscape and environment.

More importantly, there has been no evaluation of how nocturnal wildlife will be affected. Species such as 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 application fails to include any assessment of lighting impacts or a phototaxis study, and thus does not address how aviation lighting may affect these species or raise mortality rates.

This issue is exacerbated by the use of daytime survey data in the ornithological assessment, which does not account for nocturnal activity or related risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of specific night-time data creates a significant gap in understanding the ecological impacts.

Without an evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The required standard of evidence to rule out adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful decision.

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the comprehensive assessment of landscape and seascape impacts, as the night-time character is a vital part of the environment.

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

TOURISM

The assessment of tourism impacts related to the development proposal is inadequate and does not evaluate the economic and social effects on a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which relies heavily on these natural features. The application acknowledges that 86% of visitors are attracted by the scenery, but it fails to provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has experienced notable growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and potential decline in environmental quality might impact Tourism Gross Value Added or the broader economic resilience of the region. This lack of analysis makes it impossible to assess whether the development would yield a net

economic benefit or harm a sector that is both established and expanding.

Furthermore, the assessment neglects the significance of environmental quality in promoting tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as the rising interest in nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this issue, resulting in a crucial gap in understanding the potential impacts on a recognised and developing segment of the local economy.

For an island community with limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been analysed as required under the Islands (Scotland) Act 2018.

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

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and considering the island's economic dependence create a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. The current proposal is presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps in baseline data and the continued use of an undefined design envelope raise concerns regarding the evidential foundation for this application. The reliance on unspecified mitigation measures and the omission of critical impact pathways, such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects, contribute to an Environmental Impact Assessment that is incomplete. This lack of thorough analysis impedes a full understanding of the likely significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands

(Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment is a material omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is inconsistent with the National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. It also fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, clouding the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and could be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold needed to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

I visit the hebrides every year for the beautiful scenery, the wildlife and peace and quiet. I have many friends on the island who adore where they live for these reasons. If this is now being threatened by something that is not needed because we generate too much electricity for our own grid to use at the moment, then I don't see that it is needed. It's only benefiting other countries to the detriment of our own people, wildlife and landscapes. I say no to this development. Keep our landscapes beautiful and our wildlife alive. I'm not against alternative power sources, but I don't think this is the correct one for here. Please do not build these here.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 40C6C91C

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The application fails to provide an adequate evidential basis for a lawful determination, as critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, while the unspecified mitigation measures mean their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

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

The scale of the proposal is unprecedented in this location, as large turbines are positioned in close proximity to the shoreline. This raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of supporting a lawful determination. In such circumstances, the precautionary principle must apply. The proposal is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the proposal raise fundamental concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks crucial information and does not offer a full, transparent, or reliable account of the likely environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates significant uncertainty. This variability undermines the integrity of the

assessment and means that the impacts outlined may not correspond to the actual development that would be constructed. Consequently, both the public and the competent authority are left without a clear understanding of 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 based on the promise that environmental harm will be addressed later prevents a meaningful evaluation of these measures' effectiveness or an accurate assessment of residual impacts. This deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the intentions behind the Environmental Impact Assessment regime, which demands that significant effects and mitigation strategies be clearly established before determination.

There are also serious evidential gaps within the report, which include deficiencies in baseline data, limitations in methodology, and an over-reliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty surrounding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot comply with statutory obligations.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including the requirements for biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully evaluated or that appropriate safeguards are established.

In summary, the combination of an undefined design envelope, a lack of specified mitigation, and insufficient baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These significant deficiencies impede a lawful and thorough assessment of environmental effects and leave 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 does not align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it merely presents a narrative about project evolution. This lack of rigor indicates that less harmful options have not been properly identified, assessed, or selected over more damaging solutions.

Additionally, the application does not include a transparent or evidence-based comparison of alternative offshore locations, development scales, or design configurations. It notably lacks any demonstration that the developer has thoroughly considered positioning turbines further offshore, which could likely reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining the overall impact, this absence of analysis means that it cannot be concluded that the proposed siting is the least damaging option.

These deficiencies also extend to the evaluation of cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been properly explored to avoid or minimise impacts on sensitive receptors. This includes sites of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been implemented, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be asserted 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 facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application raises significant concerns due to its inherent flaws and inconsistencies. Central to these issues is the failure to adequately demonstrate that the internationally important seabird populations on the west coast of the Isle of Lewis will not face adverse impacts. These seabird species are already experiencing declines, and the development is situated within critical foraging areas and migratory corridors. However, the assessment lacks a thorough evaluation of potential risks such as displacement, collision, and habitat loss.

A notable contradiction arises within the application, as the developer asserts there will be no significant adverse effects while also pursuing a Habitats Regulations derogation. Such a case is typically only necessary where significant harm is anticipated, casting doubt on the reliability of the assessment. This inconsistency suggests that the conclusions drawn are not underpinned by sufficient evidence. The assessment inadequately addresses the potential effects on seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, failing to consider the critical nature of these feeding grounds. Furthermore, the reliance on modelling techniques introduces

uncertainties, particularly for vulnerable species like Kittiwakes and Fulmars, with the methodologies likely underestimating mortality rates due to gaps in baseline data and limited understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents an additional, serious risk by creating a barrier in a crucial flight path for species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor, as well as the potential impacts on species with small global populations, have not been sufficiently assessed.

Regulatory standards necessitate a robust evidential foundation to demonstrate no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations of modelling approaches, indicates that the application does not meet the standard of beyond reasonable scientific doubt. This situation invokes the precautionary principle, hindering any lawful endorsement of the proposal. Furthermore, the identified deficiencies signify non-compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural resources. The inability to conclusively demonstrate that internationally significant seabird populations will not be adversely affected places the development in contradiction with national policy.

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological deficiencies, and insufficient evidence. These factors collectively impede a thorough evaluation of the impacts and affirm that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage along the West Lewis coastline is severely lacking and does not recognise this area as a vibrant cultural landscape. Here, environment, language, tradition, and community are deeply intertwined. Instead of acknowledging these connections, the application adopts a simplistic view, treating heritage merely as isolated, static assets without acknowledging their active social, cultural, and spiritual significance within the community.

Particularly troubling is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places of spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight neglects their ongoing use, meaning, and the implications of development on their settings. Consequently, the evaluation of cultural impacts remains incomplete, overlooking the vital role these sites play in community life.

Moreover, the assessment fails to consider intangible cultural heritage, including the Gaelic language, local traditions, and the long-standing relationship that the community has with the coastal environment. These elements are essential to the region's identity yet are entirely omitted from the assessment, constituting a significant gap. Without recognising these crucial factors, it is impossible to accurately gauge the

cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity recognised as characteristic of Indigenous Peoples; however, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and neglects the established principles for participation in decisions affecting cultural and environmental interests.

A major procedural failure in this context is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these deficiencies directly contravene the National Planning Framework 4, especially concerning the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, clearly diverges from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the complete Social Impact Assessment significantly hampers the evaluation of social, economic, and health impacts associated with the proposed development. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the full report, which is a substantial omission within the application. This failure to provide comprehensive information undermines the Environmental Impact Assessment process.

Available summaries suggest that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These observations are based on direct engagement with the community and not mere speculation. However, the lack of transparency regarding the full assessment restricts proper scrutiny of these findings and limits the ability to assess their importance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this recognition, these social impacts have not been adequately incorporated into the main application, nor have they been given the appropriate emphasis. The omission of the complete Social Impact Assessment obscures the true

social and human costs of the development.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Developments should enhance positive health outcomes and avoid harm, yet the evidence at hand suggests existing adverse effects that have not been fully revealed. Without the complete assessment, the application cannot confirm compliance with this policy.

Ultimately, the failure to disclose the full Social Impact Assessment, coupled with evidence of pre-existing negative impacts, results in an incomplete and unreliable evaluation. This lack of comprehensive information hinders a lawful determination and supports the conclusion that the application lacks sufficient backing.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

There is a notable inconsistency within the application regarding the need for licences to permit harm to European Protected Species, which is acknowledged while simultaneously describing the impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly in situations where harm is expected to a degree that necessitates legal authorisation.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves onshore infrastructure works associated with offshore turbines, yet the assessment of these onshore elements is fundamentally inadequate. The onshore components are interconnected with the offshore project, but their separate evaluations lead to a disjointed understanding of the overall environmental and socio-economic ramifications. This lack of a cohesive assessment obscures the full extent of the impacts stemming from what is essentially a singular project.

The onshore works entail cabling across protected moorland, construction of a substation near Stornoway, and the establishment of access infrastructure in sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly in Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application fails to offer a thorough evaluation of these impacts, thus hindering a complete understanding of the project's environmental footprint.

By deferring the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered in conjunction, but the compartmentalisation of offshore and onshore components means that the combined effects on peatlands, habitats, and local communities are not fully appreciated.

Moreover, the application poses substantial risks to sensitive habitats such as machair systems and peatland environments, which are safeguarded by policy. There is no demonstration that the impacts on these habitats have been comprehensively evaluated or that suitable avoidance measures have been enacted. This creates a significant evidential gap concerning biodiversity protection.

Concerns about carbon balance are also raised by this proposal. Disturbance of peatland can release stored carbon, possibly resulting in a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or prove that the overall carbon balance is favourable.

The routing of the infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, which questions the feasibility and lawful execution of the proposal.

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

In summary, the disconnection between project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and untrustworthy, impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline boasts exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will be visible across long distances, creating an intrusive “wall of light” effect that will fundamentally change the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the local identity and the emerging astro-tourism sector. Consequently, there exists a clear gap in the overall landscape and environmental assessment due to this oversight.

Equally concerning is the complete absence of an evaluation regarding the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly susceptible to artificial lighting, as it can lead to disorientation and increased collision risks. The application lacks any lighting impact assessment or phototaxis study, thereby failing to examine how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment only exacerbates the issue, as it does not account for nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data constitutes a serious gap in understanding the potential ecological impacts.

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

From a policy standpoint, these omissions directly conflict with National Planning

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

Overall, 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

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application mirrors the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was established. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in numerous critical areas.

There are significant gaps in the baseline data provided, reliance on an undefined design envelope, and a lack of specified mitigation measures. Additionally, key impact pathways have been omitted, including those concerning nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to enable a comprehensive understanding of potential significant effects or residual impacts.

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

The proposal also contradicts National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural places, or cultural heritage. It fails to present acceptable health and wellbeing impacts and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Moreover, the cumulative impact of both offshore and onshore elements has not been thoroughly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. The assessments concerning 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, thus invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

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

In summary, this application is procedurally and substantively unfit for determination. The magnitude of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. The competent authority should refuse consent on these grounds or invoke the relevant

regulatory provisions to compel the submission of the missing information.

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

Additional Comments

There are far too many wind turbines sitting idle. Ayrshire is polluted with them and very much impacts on the green land, wild life and beautiful scenery. There are very few people from the community employed on a permanent basis and energy costs continue to rise. Ayrshire has been ruined but it is not too late to save other areas of our beautiful country from what seems to be a con.

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: B0981DF9

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

Dear Sir/Madam

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

The application is deficient in providing a solid evidential foundation for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Many essential aspects of the proposal remain undefined. The flexible design framework employed complicates an accurate assessment of likely significant effects, while the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation does not afford a comprehensive understanding of the potential environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust evidence to support them.

There are significant conflicts with established policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national standards aimed at safeguarding biodiversity, climate objectives, and environmental integrity. Such conflicts directly affect the statutory tests necessary for granting consent and impair the competent authority's ability to conclude that the development aligns with policy requirements.

The unprecedented scale of this proposal, with large turbines positioned dangerously close to the shoreline, raises major concerns about landscape capacity, visual dominance, and environmental repercussions. Together, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not give a clear or dependable account of the potential environmental impacts of the proposed development. There is significant uncertainty due to the use of a flexible Project Design Envelope, which avoids commitment to specific details such as turbine dimensions and layouts. This uncertainty hinders a consistent worst-case scenario analysis and compromises the overall integrity of the assessment. Consequently, the public and the competent authority are unable to grasp the full scope of the environmental effects that the project may cause.

The application depends heavily on mitigation strategies, monitoring plans, and management measures that have not been outlined. By seeking consent based on the promise that environmental damage will be mitigated later, the application prevents any thorough assessment of the effectiveness of these measures or consideration of residual impacts. This postponement of essential information until after consent is granted is unacceptable from a procedural standpoint and undermines the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly defined before any decisions are made.

There are notable gaps in evidence, such as insufficient baseline data, methodological limitations, and a reliance on assumptions instead of solid, site-specific evidence. This lack of information creates uncertainty about the magnitude and significance of impacts, particularly when claims of negligible or non-significant effects are made without adequate supporting data. The insufficient detail leads to an unclear picture of cumulative and worst-case impacts and introduces scientific uncertainties that conflict with statutory requirements.

Therefore, the application does not fulfil the evidential standards set by the Habitats Regulations, which are necessary to exclude adverse effects beyond reasonable scientific doubt. This situation calls for the precautionary principle to be applied, particularly concerning protected species and vulnerable habitats. Moreover, the proposal does not satisfy the requirements of National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been comprehensively evaluated or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a proper assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of a reasoned comparison of realistic alternatives based on their environmental effects, it provides a narrative of project development. This approach does not show that less harmful

options have been properly identified, assessed, and chosen over more damaging ones.

There is no transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations. The developer has not adequately considered placing turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline makes the proximity to shore crucial in determining impact. Without this analysis, it is impossible to conclude that the proposed siting is the least damaging option.

The shortcomings also apply to cable routing and landfall assessment, as there is insufficient evidence that alternative routes have been explored to lessen impacts on sensitive receptors. This includes important cultural and spiritual sites such as Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests a lack of mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not prove that environmental harm has been minimised through site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy and leaves the competent authority unable to determine if less harmful and more suitable alternatives exist. Without a thorough alternatives assessment, it cannot be said that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission, further contributing to the conclusion that the application has not been thoroughly evaluated and cannot receive 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 proposed development is fundamentally flawed and lacks the necessary evidential support to demonstrate that it will not adversely affect the internationally important seabird populations found along the west coast of the Isle of Lewis. This region is home to many seabird species that are already in decline, and the application fails to adequately address the implications of potential displacement, collision risk, or habitat loss within key foraging areas and migratory pathways.

There is a significant contradiction within the application itself, as it asserts that there will be no significant adverse effects while simultaneously putting forth a Habitats Regulations derogation case. Such a case is only applicable when significant harm is anticipated, thus raising concerns about the credibility of the assessment and the validity of its conclusions. The evidence presented does not convincingly establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. Moreover, the critical importance of these feeding grounds has not been thoroughly assessed, and the modelling approaches used introduce considerable uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates,

especially given the incomplete baseline data and the lack of understanding of behavioural responses.

The placement of turbines within a known migratory corridor poses an additional significant risk, as it effectively obstructs a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to confirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and modelling deficiencies, means that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby precluding a lawful conclusion in favour of consent. Furthermore, the identified deficiencies are indicative of non-compliance with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The inability to establish that internationally important seabird populations will remain unaffected directly conflicts with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is significantly flawed, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, traditions, and community are deeply intertwined. The application approaches heritage in a limited manner, viewing it merely as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet they are mischaracterised as mere static features. This oversight neglects their continuing use and meaning, as well as the impact that development may have on their surroundings. Such misrepresentation leads to an incomplete assessment of cultural implications and overlooks their integral role in community life.

Moreover, the application does not take into account the intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment. These elements are essential to the area's identity but are wholly omitted from the assessment, which is a critical gap. Without addressing these factors, the cultural implications of the

development cannot be fully grasped.

Concerns about community rights and engagement further exacerbate the situation. The Gaelic-speaking community has a unique cultural identity that aligns with recognised characteristics of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent, which undermines the validity of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a significant procedural flaw in the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the process unlawful.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to recognise living cultural practices, constitutes a clear violation of policy standards.

In summary, the inadequate assessment of living heritage, intangible cultural value, community rights, and legal responsibilities results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application lacks a sufficient foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal has been met with significant concern due to the evident deficiencies in the assessment of social impacts, health, and wellbeing. While the developer did commission a Social Impact Assessment that involved focus groups with local residents, the absence of the full report raises substantial issues. This lack of transparency creates a notable evidential gap, hindering both the public and the competent authority from fully grasping the extent of social risks identified in the developer's own research.

Summaries provided reveal that residents are currently facing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These findings stem from direct engagement, indicating that the impacts are concrete rather than speculative. However, without access to the complete assessment, it is impossible to scrutinise these findings properly or evaluate their significance in the decision-making process.

Furthermore, there is a clear perception that the proposal threatens community identity and cohesion, with "cultural loss" cited in the developer's findings. Regrettably, these serious impacts have not been adequately considered in the main application, nor have they been assigned the appropriate weight. The withholding of the full Social Impact

Assessment obscures the true human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process itself. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application does not present a sound evidential basis necessary to weigh benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid causing harm; however, the evidence available suggests that existing adverse effects have not been fully disclosed. Without the full assessment, it cannot be shown that the proposal complies with this policy.

The procedural ramifications are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission signifies a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This undermines the possibility of a lawful determination and confirms that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts and the associated seascape and landscape implications is seriously flawed and does not sufficiently acknowledge the extent of change nor the sensitivity of the receiving environment. The open Atlantic horizon and undeveloped character of the West Lewis coastline contribute to a strong sense of remoteness. Introducing large-scale turbines in proximity to the shoreline would create a significant and ongoing industrial presence, which would fundamentally transform the character of this landscape in a permanent and irreversible way.

Moreover, the proposal fails to accurately portray the magnitude of the anticipated visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment inadequately reflects the significance of these impacts within such a sensitive landscape context.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Consequently, there is a risk that the

actual visual impact has been minimised, which calls into question the assessment's overall reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. Treating these as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and affecting their connection to the natural horizon. This is not merely a visual concern; it represents a wider cultural and spatial detriment that has not been sufficiently examined in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, especially regarding the protection of natural places and historic assets. The level of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further weakens any assertion of policy adherence.

It is evident that the impacts identified are not likely to be mitigated effectively. Given the scale, height, and proximity of the turbines, their presence would be prominent and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a credible evaluation and reinforce the position that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal 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 application presents substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling for an extended duration is likely to disturb marine life over considerable distances, notably affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without providing adequate supporting evidence.

The waters off the West Lewis coast host a rich marine ecosystem alongside an active fishing industry. However, the assessment of fisheries and marine life appears insufficient, lacking a robust evaluation of ecological and socio-economic impacts. The application fails to convincingly demonstrate how these vital uses and habitats can be safeguarded from significant disruption.

A critical issue arises from the assumption that fishing activities can be displaced without adverse consequences. There is no evidence presented that alternative fishing grounds are available or accessible, nor that they can sustain any increased pressure. This gap is particularly concerning, as the risks of displacement could lead to overfishing in other areas, with broader economic repercussions for the local fishing fleet. The absence of a clear, evidence-based assessment means that the impacts on fisheries and livelihoods remain poorly understood.

The application acknowledges the need for licences to permit harm to European Protected Species, yet simultaneously characterises these impacts as negligible. This inconsistency undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is anticipated to a level that necessitates legal authorisation.

Furthermore, the assessment neglects to consider cumulative impacts resulting from

various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and local socio-economic conditions.

From a policy standpoint, the proposal does not demonstrate compliance with 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, thus obstructing any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is lacking and does not account for the full extent of impacts resulting from this integrated project. The offshore turbines and onshore works are connected, yet they are evaluated separately. This fragmented approach hides the true scale of environmental and socio-economic effects.

Onshore elements involve cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. Excavation in areas of deep peat, particularly in Barvas Moor, a significant carbon store and ecologically delicate habitat, is part of these works. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

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

There are substantial risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not prove that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been applied. This results in a clear gap in evidence regarding biodiversity protection.

Additionally, there are concerns related to carbon balance. Disturbance of peatland releases stored carbon, which could lead to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this concern or show that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land could lead to conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project as a whole and to demonstrate 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 weakens the application.

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence on 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 important for environmental quality, cultural identity, and tourism. The proposal includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This would significantly change the night-time environment.

The application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Dark skies are crucial to the area's identity and to emerging sectors like astro-tourism. This oversight leads to a notable gap in the landscape and environmental assessment.

Moreover, the application does not evaluate the effects of artificial lighting on nocturnal wildlife. Birds such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to such lighting, which can cause disorientation and increase collision risks. There is no lighting impact assessment or phototaxis study included, which means the potential effects on these species and their mortality rates are not addressed.

The situation is worsened by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this has also not been assessed. The lack of specific night-time data leads to a significant understanding gap regarding ecological impacts.

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

From a policy standpoint, this omission contradicts National Planning Framework 4, which aims to protect natural places and ensure environmental quality. It also weakens

the overall evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife presents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and cannot support a lawful determination.

TOURISM

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

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

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

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

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

In summary, the cumulative failure to quantify tourism impacts, evaluate the environmental factors that influence visitor behaviour, and acknowledge the island's

economic reliance culminates in a substantial evidential gap. This deficiency hampers a thorough evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the key issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this under an enhanced policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify the fundamental shortcomings.

There are notable deficiencies in the evidential basis required for determining the application. Critical gaps exist in baseline data, and there remains an undefined design envelope alongside unspecified reliance on mitigation measures. Furthermore, key impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism impacts, have been overlooked. Consequently, the Environmental Impact Assessment is insufficient, impeding a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the incomplete disclosure of the Social Impact Assessment represents a serious 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.

The proposal is in direct contradiction with National Planning Framework 4. It fails to adequately protect biodiversity, natural environments, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent and do not satisfy the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, precluding a lawful conclusion that the 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, loss of

dark skies, and disruption of cultural and visual relationships will have permanent effects on tourism that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The vast array of information gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs the ability to make a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuses consent on these grounds or employs the relevant regulatory provisions to obtain the necessary missing information.

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

Additional Comments

Lewis is a wild and beautiful place which has no parallel on earth. Bringing industrial wind turbines to generate electricity which may be lost in transmission and/or not be usable because of excess production will destroy the many unique elements that make this island so special with little if any benefit in return.

The impact of such a huge development on the wildlife, on land, sea and air, cannot be assessed adequately by a desktop exercise; there are no parallel models to compare this proposal to.

I object to the proposal as it stands and fervently hope that it is rejected to allow this wonderful place to be a sanctuary for future generations without the spectre of international companies building the biggest electricity generating system with no regard to its history and cultural significance.

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: 75FA28A2

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The basis for this objection stems from a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There is missing critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, key components of the proposal remain undefined. The use of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to assess. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not supported by robust evidence.

There are evident and substantial policy conflicts inherent in the application. 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 proposal does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and weaken the ability of the competent authority to determine the development's acceptability in policy terms.

The scale of the proposed development is unprecedented for this location, with large turbines positioned near the shoreline, raising significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and unfit to support a lawful determination. Given these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking and does not deliver a comprehensive, transparent, or dependable evaluation of the potential environmental effects associated with the proposal. The employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, which compromises the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the development that will ultimately be constructed, leaving both the public and the competent authority unable to grasp the true extent of the environmental consequences.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Consequently, consent is sought on the premise that any environmental harm will be addressed at a later date. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly established before any determination.

There are also substantial evidential shortcomings, which include gaps in baseline data, methodological limitations, and a dependency on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions asserting negligible or non-significant effects are presented without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential standards required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes obligations related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and thorough evaluation of environmental effects, leaving the competent authority without the necessary information to make an informed determination on the application.

ASSESSMENT OF ALTERNATIVES

The proposal in question lacks an adequate assessment of alternatives, failing to satisfy the statutory requirements set forth by the Environmental Impact Assessment regime. It does not provide a structured or reasoned comparison of viable alternatives

based on their environmental effects. Instead, the application offers a narrative that outlines the project's evolution, which does not adequately demonstrate that less harmful options have been appropriately identified, evaluated, and selected over more damaging alternatives.

There is a noticeable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application notably does not show that the developer has adequately considered the possibility of situating turbines further offshore, a measure that could potentially reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, coupled with the crucial significance of proximity to shore in assessing impact, the lack of such analysis undermines any claim that the proposed siting is the least damaging option available.

These inadequacies extend to the assessment of cable routing and landfall, wherein there is insufficient evidence suggesting that alternative routes have been properly investigated to avoid or lessen impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to present a clear avoidance strategy, along with the lack of comparative analysis, suggests that there has been no application of mitigation by design, relying instead on measures that would occur post-design.

Consequently, the application does not adequately illustrate that environmental harm has been minimised through careful site selection, layout decisions, and routing of infrastructure. This represents a significant failure to adhere to the established mitigation hierarchy, inhibiting the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a thorough assessment of alternatives, it cannot be concluded that the proposal is either sustainable or compliant with relevant policy frameworks.

From a policy standpoint, this deficiency calls into question compliance with National Planning Framework 4, particularly with regard to the protection of natural areas, cultural heritage, and the wellbeing of the community. The lack of a structured and comparative assessment constitutes a material omission that contributes to the overall finding that the application has not been thoroughly assessed and thus cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly lacking, providing an incomplete and unreliable picture of the ecological receptors in the West Lewis coastal environment. This region is a sensitive and biologically rich marine system, yet the baseline data presented is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the evaluation fails to establish a robust evidential basis for assessing potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application neglects to properly identify and assess their active usage of coastal areas for foraging and movement. The assessment overlooks their core foraging range and behavioural patterns, leading to an insufficient evaluation of the potential impacts of construction disturbance, noise, and increased activity. This lapse undermines any findings regarding the absence of significant effects on this species.

Further, the assessment of basking sharks suffers from substantial deficiencies due to its reliance on aerial surveys, which introduce a 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 use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions of negligible or non-significant effects being based more on assumptions than on sound evidence. The lack of sufficient baseline data also hampers the ability to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty surrounding the actual level of risk to marine species and habitats.

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

Overall, the combination of inadequate baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and reinforce the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

There is a notable contradiction in the application; while the developer asserts that there will be no significant adverse effects, they simultaneously present a Habitats

Regulations derogation case, which is only necessary when significant harm is anticipated. This raises serious doubts about the reliability of the assessment and highlights that the conclusions drawn are not substantiated by the evidence provided.

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally insufficient, failing to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are intricately linked. The application adopts a reductive perspective, treating heritage merely as a collection of isolated and static assets, neglecting their continuous social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practice; however, the assessment categorises them as static

features. This mischaracterisation overlooks their ongoing use, meaning, and the implications of development on their surroundings, leading to an incomplete evaluation of cultural effects and disregarding their importance in community life.

Moreover, the assessment fails to include intangible cultural heritage, such as the Gaelic language and traditions, along with the long-standing relationship the community maintains with the coastal environment. These aspects are central to the area's identity but are entirely absent from the evaluation, marking a significant omission. The absence of these factors hinders a proper understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity aligned with recognised characteristics of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and does not reflect established principles of participation in decisions affecting cultural and environmental interests.

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

From a policy standpoint, these deficiencies place the proposal in direct opposition to National Planning Framework 4, particularly regarding the preservation of historic assets and places. The failure to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a clear deviation from policy requirements.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not furnish a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Residents are reportedly experiencing significant stress, anxiety, and worry due to the scale and proximity of the proposal. These impacts are directly informed by local

engagement and should not be dismissed as mere speculation. However, the failure to release the full report restricts thorough examination of these findings and limits the capacity to evaluate their importance in the decision-making process.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline, characterised by its expansive Atlantic horizon and an undeveloped nature, contributes to a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a continuous industrial presence that fundamentally alters this unique character, leading to an irreversible transformation of the landscape. The application fails to adequately convey the magnitude of this visual change. The turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, impacting visual amenity and diminishing the inherent qualities of naturalness and remoteness.

Concerns arise regarding the selection and presentation of visual viewpoints within the

assessment. Evidence suggests these viewpoints may not effectively represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which in turn undermines the assessment's reliability.

Moreover, the application does not consider the interconnectedness of landscape, seascape, and cultural heritage adequately. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated entities fails to recognise their interdependence, resulting in an incomplete assessment of impacts on their setting and cultural significance. The introduction of industrial elements to the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not merely a visual impact but also broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural environments and historic assets. The extent of change proposed does not align with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

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

In summary, the assessment inadequately represents the extent of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks presented in this application is fundamentally incomplete, lacking the necessary detail to properly evaluate the potential environmental effects. Given the proposed substantial seabed preparation and installation works within a high-energy Atlantic environment, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on vague mitigation and contingency measures that are to be formulated post-consent, which severely hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming when considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean

coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application prevents a thorough evaluation of whether appropriate safeguards are established to address pollution events. This creates procedural risks and undermines the capability of the competent authority to effectively assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is critical that likely significant effects and associated mitigation measures be assessed prior to consent; without this information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These significant shortcomings obstruct a comprehensive evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to cause disturbances across large distances, which could adversely affect species such as dolphins. The potential impact on a significant proportion of the local bottlenose dolphin population is concerning; however, the application underplays the importance of these effects without adequate supporting evidence.

Furthermore, the assessment of fisheries and marine life fails to provide a thorough evaluation of the ecological and socio-economic impacts involved. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not convincingly demonstrate how these habitats and uses can be protected or maintained without considerable disruption.

A critical flaw in the application is the assumption that fishing activity can be relocated without repercussions. There is no evidence provided to indicate that alternative fishing grounds are available, accessible, or able to support the additional pressure that may arise from displacement. This oversight is crucial, as such displacement poses risks of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a well-founded assessment, the impacts on fisheries and local livelihoods remain inadequately understood.

Inconsistencies within the application further raise concerns, particularly regarding the need for licences to permit harm to European Protected Species, which are acknowledged while simultaneously described as having negligible impacts. This contradiction undermines the credibility of the assessment and raises significant issues related to compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

The assessment also neglects to take into account the cumulative impacts from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is essential for determining the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application 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 obstructs any conclusion that the proposal signifies sustainable development.

Ultimately, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies compromise the reliability and completeness of the assessment. These deficiencies hinder a robust evaluation of the impacts 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 lack of assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment is a significant omission that raises serious concerns. The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining the environmental quality, cultural identity, and tourism potential of the area. The introduction of permanent red aviation lighting will create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Furthermore, the proposal fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is especially critical as dark skies contribute to the identity of the area and are

increasingly important for emerging tourism sectors such as astro-tourism. The absence of this assessment reveals a glaring gap in the overall landscape and environmental evaluation.

Equally concerning is the lack of consideration for nocturnal wildlife. Species like 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 a heightened risk of collisions. The proposal does not include any assessment of the lighting's impact or a phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and their mortality rates.

The deficiencies in the ornithological assessment are compounded by the reliance on daytime survey data, which fails to account for nocturnal behaviours and associated risks. Kittiwakes, for example, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been addressed. The lack of site-specific night-time data creates a critical deficiency in understanding the ecological impacts.

Without an assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would suffer 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 preventing a lawful determination.

Moreover, this omission conflicts with the National Planning Framework 4 regarding the protection of natural places and environmental quality, undermining the overall assessment of landscape and seascape impacts. Night-time character is an integral aspect of the environment that has not been sufficiently addressed.

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

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

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

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

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

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

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

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

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

Additional Comments

This proposal is focussed on one of the last areas of true wilderness in the UK. To destroy such a wild and remote area is totally unacceptable and will potentially devastate the beautiful place that so many people come to visit and that sustains local communities. Industrialisation here is anathema to our culture and heritage and should not be allowed to dominate our future. It is also an important feeding ground for wildlife and this too will be disrupted if the so called 'development' goes ahead.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 3D047800

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documents, revealing 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 known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale of the proposal, alongside the positioning and design of the turbines, presents serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis required for lawful approval. Key environmental data is absent, baseline information is insufficient and inconsistent, and numerous aspects of the proposal remain undefined. The flexible design framework complicates the ability to ascertain likely significant effects, and the reliance on unspecified mitigation measures means that their potential effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects are not substantiated by robust evidence.

The proposal exhibits clear and substantial conflicts with policy. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not establish that the national requirements for the protection of biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly relate to the statutory tests necessary for consent, diminishing the competent authority's capacity to determine that the development meets policy acceptability.

Moreover, the unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking, failing to deliver a comprehensive, clear, or dependable overview of the anticipated environmental repercussions of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, creates a considerable degree of uncertainty. This uncertainty undermines the reliability of the assessment, meaning that the potential impacts may not accurately reflect the development that will ultimately be built. Consequently, both the public and the competent authority are left without a proper understanding of the true scope of environmental effects.

Moreover, the application places significant emphasis on mitigation measures, monitoring strategies, and management plans that have yet to be established. By seeking consent on the premise that environmental damage will be mitigated later, there is a lack of opportunity for meaningful evaluation of these measures or assessment of any residual impacts. This postponement of crucial information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation must be clearly defined before determination.

The report also exhibits serious evidential shortcomings, with gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainties about the scale and significance of impacts, particularly when findings of negligible or non-significant effects are presented without solid supporting data. The insufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not satisfy the evidential criteria required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, since it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specific mitigation, and the deficiencies in baseline data culminate in an Environmental Impact Assessment Report that is neither reliable nor complete. These issues preclude a lawful and rigorous evaluation of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a coherent comparison of realistic options based on their environmental impacts, it presents a narrative that details the evolution of the project.

This approach does not show that less harmful alternatives have been identified and evaluated in preference to more damaging choices.

There is a significant absence of transparent comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the developer has not adequately considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. The West Lewis coastline is particularly sensitive, and its proximity to the shore is crucial in assessing environmental effects. The lack of analysis in this area means that the proposed siting cannot be definitively deemed the least damaging option.

The inadequacies also extend to the routing of cables and landfall assessments, where there is insufficient evidence to suggest that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis indicate a lack of application of mitigation by design, with an undue reliance on post-design measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain the existence of less harmful and more suitable alternatives. In the absence of a rigorous alternatives assessment, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The methodologies employed in assessing marine ecology and protected species are fundamentally flawed, resulting in an unreliable understanding of the ecological receptors within the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the incomplete baseline data means that the presence, behaviour, and habitat use of various species have not been adequately captured. The implications of this are significant, as it undermines the validity of the assessment in evaluating potential impacts.

A critical oversight is evident concerning otters, a European Protected Species. The application does not properly acknowledge their active utilisation of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means that the assessment fails to consider the potential effects of construction disturbances, noise, and increased activity on these animals.

Consequently, the conclusions drawn regarding the absence of significant effects on otters lack a solid evidential basis.

The assessment of basking sharks also suffers from notable deficiencies, particularly due to the reliance on aerial surveys which introduces significant detection bias in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially in light of land-based observations that indicate these waters are frequented by the species. The disregard for such pertinent data results in an incomplete baseline and undermines the reliability of the conclusions drawn.

As a result of these methodological shortcomings, the claims of negligible or non-significant effects are based on assumptions rather than robust evidence. Furthermore, the lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This fosters uncertainty about the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. The failure to properly identify and assess protected species introduces a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, thus rendering the granting of consent unlawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

There exists a critical contradiction in the application, as the developer asserts there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available. The assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain

unaffected. Furthermore, the importance of these feeding grounds is inadequately addressed, and the reliance on modelling techniques introduces uncertainty, especially for species experiencing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses are not thoroughly understood.

The siting of turbines within a recognised migratory corridor adds another significant risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of continued mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to conclude that there is no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been reached. This activates the precautionary principle and hinders a lawful conclusion in favour of consent.

Additionally, the identified deficiencies reflect a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, preventing a thorough evaluation of impacts and leading to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy of the assessment concerning cultural heritage and community identity is alarming, as it does not acknowledge the West Lewis coastline as a vibrant cultural landscape. This area, where environment, language, tradition, and community are deeply interconnected, is treated reductively in the application, which views heritage merely as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

Significant shortcomings are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These active burial sites, integral to spiritual practices, have been mischaracterised as static features, disregarding their current use, significance, and the effects of development on their surroundings. This oversight leads to an incomplete assessment of cultural impacts and neglects their vital role in community life.

The failure to consider intangible cultural heritage is another major concern. Elements such as the Gaelic language, traditions, and the enduring connection between the community and the coastal environment are crucial to the area's identity, yet they are

wholly omitted from the assessment. Without acknowledging these aspects, it is impossible to gain a true understanding of the cultural impact of the proposed development.

Moreover, there are pressing issues regarding community rights and engagement. The Gaelic-speaking population, which embodies the characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the assessment's credibility and disregards established principles of participation in decisions affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment represents a critical procedural failure. This assessment is a statutory requirement under the Islands (Scotland) Act 2018, and without it, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy standpoint, these shortcomings place the proposal in stark opposition to National Planning Framework 4, especially regarding the protection of historic assets and places. Ignoring both tangible and intangible heritage, as well as failing to recognise living cultural practices, constitutes a clear violation of policy requirements.

Ultimately, the collective failure to assess living heritage, intangible cultural value, community rights, and necessary statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately examined, and the application falls short in providing a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal presents significant challenges regarding the assessment of social impacts, health, and wellbeing, which are materially deficient and lack the necessary transparency for lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to grasp the complete range of social risks highlighted by the developer's own research.

Residents are already reporting measurable levels of stress, anxiety, and concern associated with the scale and proximity of the proposed development. These impacts stem from direct engagement and are not mere speculation. The failure to disclose the full assessment limits the capacity for thorough scrutiny of the findings and restricts the evaluation of their significance within the overall decision-making process.

Moreover, there is clear evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" cited among the developer's findings. However, these impacts have not been sufficiently integrated into

the main application nor afforded the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health ramifications is vital for developments of this magnitude, particularly when they may disrupt community character and function. By failing to provide the complete dataset, the application falls short of establishing a thorough evidential basis for weighing the potential benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. The development is required to promote positive health outcomes and mitigate harm; however, the evidence at hand reveals existing adverse effects that have not been fully disclosed. Without the complete assessment, the application cannot claim compliance with this crucial policy.

The procedural implications of these omissions are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and fails to meet the evidential requirements stipulated by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines in proximity to the shoreline would impose a continuous and prominent industrial presence, leading to a fundamental change in this character and resulting in an irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts does not adequately represent the scale of this change or consider the sensitivity of the receiving environment.

The visual implications of the proposed turbines are significant, as their scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not accurately convey the extent of this impact, nor its significance in the context of such a sensitive landscape.

Methodological issues also arise regarding the selection and presentation of visual

viewpoints. Evidence suggests that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This creates a risk that the visual impact has been understated, calling into question the reliability of the assessment.

Moreover, the assessment inadequately considers the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, interconnected through visual and spatial relationships with the Atlantic horizon. By treating these assets in isolation, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape threatens to sever these connections, altering the context in which these heritage assets are experienced and disrupting their link to the natural horizon. This not only poses a visual impact but also inflicts broader cultural and spatial harm that the application has not properly assessed.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which seeks to protect natural places and historic assets. The proposed scale of change is incompatible with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, as the application depends on mitigation and contingency measures that will be prepared after consent. This reliance on undefined future measures raises concerns, especially given the sensitivity of the receiving environment. The West Lewis coastline has clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination.

The application notes risks such as sediment mobilisation and accidental chemical or

oil spills but does not adequately detail how these risks will be prevented, controlled, or monitored. Additionally, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, including the potential effects on sensitive marine species and habitats.

Furthermore, the absence of detailed emergency response procedures adds to these issues. By postponing contingency planning until after consent, the application limits the evaluation of whether adequate safeguards are in place to manage pollution events. This approach introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of critical environmental safeguards goes against the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and the absence of such information means a lawful determination cannot be achieved. The application does not demonstrate compliance with the policy requirements concerning environmental protection and water quality. Overall, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainty about potential impacts make the assessment materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life presented in the application is inadequate and lacks a thorough assessment of both ecological and socio-economic impacts. Specifically, the waters off the West Lewis coast host a rich marine ecosystem alongside a functioning fishing industry, yet the application fails to adequately safeguard these critical uses and habitats from potential significant disruption.

A notable concern arises from the presumption that fishing activities can simply be relocated without repercussions. The application does not provide any substantiated evidence that alternative fishing grounds are either available, accessible, or able to accommodate increased pressure. This significant gap raises the risk of overfishing in other areas and may lead to broader economic consequences for the local fishing fleet. In the absence of a well-supported evaluation, the implications for fisheries and livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The anticipated high-energy hammer piling over an extended timeframe is expected to cause disturbances over extensive distances, impacting species such as dolphins. Concerns arise from the predicted disruption to a substantial portion of the local bottlenose dolphin population, yet the application inadequately addresses the significance of these effects, lacking sufficient supporting evidence.

Additionally, the application reveals a contradictory stance regarding the need for licences to permit harm to European Protected Species, while simultaneously characterising such impacts as negligible. This inconsistency casts doubt on the reliability of the assessment and raises issues of compliance with the Habitats Regulations, particularly when harm is expected to a level that necessitates legal authorisation.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the proposed development can operate alongside existing marine users or avoid unacceptable impacts on marine biodiversity, obstructing any conclusion that the proposal constitutes sustainable development.

In summary, the insufficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions significantly compromise the credibility of the assessment. These shortcomings hinder a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns regarding the routing of infrastructure through active croft land, which may conflict with existing land use and legal rights. There is a lack of evidence indicating that necessary consents or processes have been initiated, leading to questions about the deliverability and lawful implementation of the project.

Moreover, the assessment of the project's onshore infrastructure is materially incomplete, neglecting to consider the full extent of impacts arising from what is a single integrated project. The offshore turbines and onshore works are intrinsically linked, yet they are assessed separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Key onshore elements involve cabling across protected moorland and the construction of a substation near Stornoway, along with associated access infrastructure that traverses sensitive landscapes. Notably, these works require excavation across areas of deep peat, especially within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, inhibiting a full understanding of the project's overall environmental footprint.

The exclusion or deferral of onshore impact assessments prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates

that all components of a project are considered collectively. However, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

Furthermore, there are significant risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protection. The application does not demonstrate that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented, resulting in a clear evidential gap concerning biodiversity protection.

Additionally, the proposal raises concerns about carbon balance. Disturbing peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant omission within the Environmental Impact Assessment, undermining its completeness. The West Lewis coastline is noted for its exceptionally dark skies, which are critical to the region's environmental quality, cultural identity, and the value of tourism. The proposal includes the introduction of permanent red aviation lighting that will be visible over extensive distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change will fundamentally alter the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the identity of the area and the emerging tourism sectors, such as astro-tourism, this omission is particularly important. The absence of these considerations indicates a clear gap in the overall landscape and environmental assessment.

Additionally, there is no evaluation of how the proposed lighting may affect nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are highly sensitive to artificial lighting, which can lead to

disorientation and an increased risk of collision. The application does not provide any lighting impact assessment or phototaxis study, which would be necessary to evaluate the potential effects of aviation lighting on these species or the risk of increased mortality.

This gap is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activities and their associated risks. Species such as Kittiwakes, which may forage or migrate during the night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a critical void in understanding the ecological impacts.

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

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It further diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of night-time is a crucial component of the environment.

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

TOURISM

The evaluation of tourism impacts lacks depth and does not address the economic and social effects on a vital sector of the Isle of Lewis economy. The area's tourism depends heavily on its wild coastline, nearly untouched landscapes, dark skies, and sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and the decline in environmental quality would affect Tourism Gross Value Added or the broader economic resilience. Without such analysis, it is impossible to ascertain whether the development would provide a net economic benefit or jeopardise a well-established and growing sector.

Additionally, the assessment neglects to consider the role of environmental quality in

supporting tourism. The significance of unspoiled landscapes and dark skies to visitor experience and emerging markets like nature-based tourism and astro-tourism has been overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a major gap in understanding the effects on a recognised and expanding part of the local economy.

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to show net benefits. It also contradicts strategic objectives that classify tourism as a priority growth sector and fails 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 the environmental factors influencing visitor behaviour, and recognise the island's economic dependency leads to a significant evidential gap. This deficiency hinders a thorough assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary requirements for sustainable development. It does not align with statutory duties, national policy, or evidential standards. This proposal repeats the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the extent of industrialisation. Although the current application is presented under a stronger policy framework, it still does not adequately address biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical gaps in the evidential basis for determination. The application lacks complete baseline data, relies on an undefined design envelope, and specifies mitigation measures that have not been fully articulated. It omits essential impact pathways concerning nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and does not provide a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural failures are evident. The absence of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018. Furthermore, not disclosing the complete Social Impact Assessment is a significant omission. These deficiencies hinder the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal remain unclear and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

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

Additional Comments

I am not anti windfarms or green energy but I am deeply concerned that in this case big profit is the driver and not a need for green energy alternatives and climate change. If the motives for this development were about care for the environment and our planet it would be smaller, require less infrastructure and peat disturbance, be further away from shore and whale migration routes and manufactured from materials with a lower environmental impact. (Recycled, recyclable, long lasting)

Given Scotland already produces more renewable energy than it uses makes it very hard to justify such a destructive development in the name of "need more renewables". Especially considering the large number of other developments currently proposed for Scotland. Where is the overview of the country's need?

What we need locally is more small scale community run developments who's impacts are small with real local benefits. The fact that smaller locally beneficial developments are unable to secure grid connections because of the excessive number of big developments like this is another reason this should be refused.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 014901B4

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and its accompanying documents has revealed significant deficiencies in material planning, environmental considerations, cultural impacts, and procedural compliance. The development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, nearly pristine environment, and rich cultural identity. There are fundamental concerns about the compatibility of the proposal's scale, proximity, and design with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis necessary for a lawful determination. There are critical gaps in environmental data, and the baseline information provided is limited and inconsistent. Furthermore, key aspects of the proposal remain undefined. The use of a flexible design framework obscures a clear understanding of the likely significant effects, while reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are not substantiated by robust evidence.

There are evident and substantial conflicts with policy. The proposal appears to diverge from the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests for consent and undermine the capacity of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal introduces large turbines positioned in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental repercussions. Collectively, the insufficiency of information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed, as it heavily relies on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent on the premise that environmental harm will be managed later undermines the ability to evaluate the effectiveness of these measures or to assess the residual impacts of the proposal. This postponement of crucial information until after consent is granted is not only procedurally unacceptable but also runs counter to the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and their mitigations should be established clearly before any determination.

Additionally, the Environmental Impact Assessment Report is materially deficient and fails to present a full, transparent, or reliable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, without specific commitments to turbine dimensions, layouts, or configurations, adds substantial uncertainty. This lack of specificity hinders a consistent assessment of a worst-case scenario, thereby undermining the integrity of the evaluation process. As a result, the impacts outlined may not accurately reflect the actual development that would be constructed, leaving both the public and the competent authority in the dark regarding the true extent of the environmental effects.

There are also significant evidential deficiencies present, including gaps in baseline data and methodological limitations, which lead to a reliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty surrounding the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The inadequate information provided prevents a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

Due to these deficiencies, the application does not meet the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. The precautionary principle must be applied, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that suitable safeguards are established.

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

ASSESSMENT OF ALTERNATIVES

The application fails to meet the necessary statutory requirements of the Environmental Impact Assessment regime due to its materially inadequate assessment

of alternatives. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, the documentation presents a narrative account of how the project evolved. This method does not demonstrate that less harmful options were properly identified, assessed, and selected over more damaging solutions.

There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has thoroughly considered placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining impacts highlight the significance of this omission. The absence of such analysis precludes any conclusion that the proposed siting is the least damaging option available.

The inadequacies also extend to cable routing and landfall assessments, with insufficient evidence indicating that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors. This includes significant areas such as Barvas Cemetery, which hold cultural and spiritual importance. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been properly applied, relying instead on post-design mitigation measures.

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

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material deficiency that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species presents significant shortcomings, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal area. This environment is both highly sensitive and biologically active, yet the data on existing conditions is insufficient, and the methodologies used do not effectively capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment fails to provide a solid evidential basis for assessing impacts.

A notable gap in the analysis pertains to otters, which are classified as a European

Protected Species. The application does not adequately acknowledge or evaluate their active usage of coastal regions for foraging and movement. The oversight of their core foraging range and behavioural patterns means that the potential impacts stemming from construction disturbance, noise, and increased activity remain inadequately assessed. This significant omission casts doubt on any conclusions drawn regarding the absence of noteworthy effects on this species.

There are also considerable flaws in the assessment of basking sharks, as the reliance on aerial surveys introduces a substantial bias in detection, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate these waters are frequented by such species. The failure to incorporate or give proper consideration to this data leads to an incomplete baseline, further undermining the reliability of the conclusions made.

The limitations in methodology result in conclusions of negligible or non-significant effects being based on assumptions rather than rigorous evidence. The lack of adequate baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the true extent of risk to marine species and their habitats.

From a regulatory standpoint, the application does not align with the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not correctly identified or assessed protected species. The degree of uncertainty raised prevents the elimination of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted lacks reliability due to significant internal inconsistencies and methodological weaknesses, which result in a failure to provide adequate evidence. The application does not meet the evidential threshold required to demonstrate that the integrity of protected sites will remain unaffected. Notably, the assessment fails to robustly evaluate the implications of displacement, collision risk, or habitat loss within key foraging areas and migratory pathways located on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline.

There exists a fundamental contradiction in the application. The developer asserts that

no significant adverse effects will occur while simultaneously proposing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and the validity of its conclusions, which are not substantiated by the evidence presented.

Furthermore, the assessment does not sufficiently account for the importance of feeding grounds associated with protected sites, such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches creates uncertainty, particularly for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain inadequately understood.

The placement of turbines within a recognised migratory corridor introduces a notable risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately addressed in the application, nor are the potential effects on species with relatively small global populations considered.

In light of these deficiencies, the application stands in direct conflict with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects undermines compliance with national policy.

Collectively, these factors contribute to the conclusion that the assessment does not fulfil the statutory requirements necessary to support a determination. The standard of beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and precluding a lawful conclusion in favour of consent.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and environmental impacts associated with the proposed development is severely lacking and does not adequately capture the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its open Atlantic horizon, lack of development, and a strong sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape that cannot be undone.

There are significant methodological issues related to the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the assessment may have understated the magnitude of the visual impact, thereby compromising its reliability.

Moreover, the application fails to evaluate the interconnected nature of landscape,

seascape, and cultural heritage adequately. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated entities, neglecting their interdependence, which leads to an incomplete understanding of the impacts on their settings and cultural significance.

The potential industrialisation of the seascape would disrupt these vital relationships, altering the context in which heritage assets are perceived and diminishing their connection to the natural horizon. This impact is not merely visual; it poses broader cultural and spatial harm that the application has not properly assessed.

From a policy standpoint, the proposed development is at odds with the National Planning Framework 4, which aims to protect natural environments and historical assets. The anticipated scale of change is incompatible with the essential objectives of safeguarding landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario analysis further undermines claims of compliance with relevant policy.

Additionally, it is evident that the negative impacts identified cannot be adequately mitigated. Given the scale, height, and proximity of the proposed turbines, their presence would be overwhelmingly dominant and unavoidable. Thus, the resulting changes to the landscape are fundamental and irreversible, rather than amenable to acceptable mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. The proposal entails significant seabed preparation and installation activities within a high-energy Atlantic environment, yet the assessment of construction and pollution risks is notably inadequate. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided, resulting in a reliance on mitigation and contingency measures that are to be formulated after consent. This reliance raises serious concerns, as it hampers any meaningful evaluation of their adequacy or effectiveness.

The application acknowledges potential risks, such as sediment mobilisation and accidental chemical or oil spills, but fails to offer sufficient detail on prevention, control, or monitoring strategies. Additionally, there is ambiguity concerning the scale and behaviour of sediment plumes generated from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these

impacts. This uncertainty extends to the marine species and habitats that have already been identified as sensitive within the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the assessment of whether suitable safeguards exist to address pollution events. This not only introduces procedural risk but also undermines the ability of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigations must be evaluated prior to granting consent, and the absence of critical information renders a lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life as presented in the application is inadequate and lacks a thorough examination of ecological and socio-economic implications. The West Lewis coastal waters are home to a rich marine ecosystem and support a vibrant fishing industry. However, the application fails to prove that these vital uses and habitats can be preserved or maintained without causing significant disruption.

A major concern is the premise that fishing activities can be relocated without repercussions. The application lacks evidence to demonstrate that alternative fishing grounds are available, accessible, or capable of accommodating the additional pressures that may arise. This gap is critical, as such displacement could lead to overfishing in other areas and may adversely affect the local fishing fleet's economic stability. Without a robust, evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over considerable distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is troubling; nevertheless, the application diminishes the importance of these potential effects without adequate supporting evidence.

Moreover, there exists a notable contradiction within the application, where the necessity for licenses to permit harm to European Protected Species is recognised, yet the impacts are simultaneously categorised as negligible. This inconsistency undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, especially where harm is expected to an extent that requires legal approval.

Additionally, the assessment does not adequately address cumulative impacts stemming from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a detailed evaluation of these collective effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, the application fails to show adherence to the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with current marine users or avoid detrimental impacts on marine biodiversity, thereby precluding any conclusion that the proposal is sustainable.

In summary, the combination of insufficient evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies results in an assessment that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project is fundamentally flawed due to its incomplete evaluation of onshore infrastructure, which fails to take into account the interconnected impacts of the offshore turbines and onshore works. This disjointed approach leads to an obscured understanding of the true scale of environmental and socio-economic effects, as the elements are considered separately.

Integral to the onshore works are the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly in Barvas Moor, an important carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of the potential impacts of these works, which hampers the ability to fully gauge the project's overall environmental footprint.

Furthermore, the absence or deferral of onshore impact assessments obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively. However, by treating offshore and onshore components separately, the combined consequences on peatlands, habitats, and local communities are inadequately understood.

Sensitive habitats, including machair systems and peatland environments, face

significant risks and are subject to policy protection. The application does not satisfactorily demonstrate that the potential impacts on these habitats have been thoroughly assessed or that effective avoidance measures are in place. This creates a discernible evidential gap concerning the protection of biodiversity.

The proposal raises additional concerns relating to carbon balance. Disturbing peatland releases stored carbon, potentially resulting in a carbon debt that runs counter to the goals of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes for these activities have been initiated, which raises doubts about both deliverability and lawful implementation.

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

In conclusion, the fragmented treatment of project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts result in a portion of the application being incomplete and unreliable, which precludes a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of nocturnal wildlife and dark skies constitutes a serious 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 potential. The proposed development introduces permanent red aviation lighting that will be visible over vast distances, resulting in a persistent and intrusive "wall of light" that would drastically transform the night-time landscape.

The application fails to evaluate how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the significance of dark skies to the region's identity and the growth of tourism sectors like astro-tourism. The neglect of these impacts highlights a substantial shortcoming in the overall assessment of landscape and environmental effects.

Moreover, there is no analysis of the consequences for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly affected by artificial lighting due to their phototactic nature, which can cause

disorientation and increase collision risks. The application lacks a lighting impact assessment or a phototaxis study, failing to investigate how aviation lighting might harm these species or raise mortality rates.

The situation is worsened by the use of daytime survey data in the ornithological assessment, which overlooks nocturnal activities and their associated dangers. For example, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been addressed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

Without an evaluation of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse consequences. The necessary evidential standard to rule out negative impacts beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions are inconsistent with the National Planning Framework 4 concerning the safeguarding of natural areas and environmental quality. Furthermore, this neglect undermines the comprehensive evaluation of landscape and seascape effects, as the character of night-time environments is a crucial component of the ecosystem.

Collectively, the lack of assessment regarding dark skies and nocturnal wildlife represents a significant evidential void. The absence of baseline data, impact modelling, and species-specific examination makes the application incomplete and incapable of achieving a lawful determination.

TOURISM

The application under consideration presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate both the economic and social ramifications for a vital sector of the Isle of Lewis economy. The economy of the island is heavily reliant on its wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is noted that 86% of visitors are attracted by the scenery, the application fails to provide any quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Tourism on the Isle of Lewis has experienced noteworthy growth, rising from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, accounting for up to 16% of the island's economy. However, there is no modelling of how the industrialisation of the seascape and the resulting decline in environmental quality would affect Tourism Gross Value Added or broader economic resilience. Without such an analysis, it remains unclear whether the proposed development would bring about a net economic benefit or harm an already established and expanding sector.

Another critical aspect overlooked in the assessment is the importance of environmental quality in sustaining tourism, particularly how unspoiled landscapes and dark skies enhance visitor experiences and cater to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment only exacerbates this issue, resulting in a substantial gap in understanding the potential effects on a recognised and thriving part of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate the impacts on tourism has broader implications, affecting employment, local businesses, and overall community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly addressed, contrary to the requirements set out in the Islands (Scotland) Act 2018.

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

Overall, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This gap hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

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

Procedural failures are also apparent. The lack of a compliant Island Communities Impact Assessment represents a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment constitutes a material omission. Such deficiencies obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic

resilience, rendering the application unsuitable for determination.

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

Uncertainties regarding environmental risks remain significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies in parts. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

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: 831A9E78

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 within the relevant marine licensing and Environmental Impact Assessment frameworks. The development is situated off the west side of the Isle of Lewis, an area known for its stunning Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal highlight its incompatibility with statutory requirements, national policy, and the principles of sustainable development.

The application presents significant deficiencies, particularly an inadequate evidential basis for lawful determination. Key environmental data is notably absent, while baseline information remains limited and inconsistent. Furthermore, many aspects of the proposal are not clearly defined. The use of a flexible design framework obscures a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation falls short of providing a complete understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by credible evidence.

Substantial policy conflicts are evident, as the proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, natural places, and health and wellbeing. It does not sufficiently demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity are achievable. These discrepancies directly challenge the statutory tests necessary for consent, undermining the competent authority's capacity to deem the development acceptable according to policy standards.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises significant worries about landscape capacity, visual dominance, and environmental consequences. Collectively, the insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and clear non-compliance with policy indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material aspects and does not offer a complete, transparent, or reliable assessment of the potential environmental effects related to the proposal. The introduction of a flexible Project

Design Envelope, which does not commit to specific dimensions, layouts, or configurations for turbines, creates substantial uncertainty. This uncertainty undermines the assessment's integrity and results in the presented impacts potentially not reflecting the actual development that will be constructed. Consequently, both the public and the competent authority are unable to gauge the true scale of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be defined. By seeking consent under the premise that environmental harm will be resolved in the future, the application restricts any meaningful assessment of effectiveness or evaluation of residual impacts. This postponement of crucial information to post-consent phases is procedurally improper and at odds with the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly established before determination.

Additionally, the application suffers from significant evidential shortcomings, such as gaps in baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. These shortcomings lead to uncertainty concerning the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations, which is necessary to rule out adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, particularly regarding protected species and sensitive habitats. Moreover, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that appropriate safeguards are established.

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

ASSESSMENT OF ALTERNATIVES

The application fails to demonstrate that environmental harm has been minimised through thoughtful site selection and infrastructure routing. It is evident that the assessment of alternatives is materially inadequate and does not meet the statutory requirements set out by the Environmental Impact Assessment regime. Instead of providing a structured comparison of viable alternatives based on environmental effects, the submission presents a narrative of the project's evolution. This approach

does not clearly show that less harmful options have been identified, evaluated, and chosen over more damaging ones.

In particular, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the developer has not convincingly considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. The sensitivity of the West Lewis coastline highlights the importance of proximity to shore in assessing potential impacts. The absence of such critical analysis prevents any assertion that the proposed siting is the least damaging option available.

The shortcomings also extend to the evaluation of cable routing and landfall assessments, as there is insufficient evidence indicating that alternative routes have been thoroughly investigated to avoid or minimise impacts on sensitive receptors. This includes culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been implemented, leading to an overreliance on post-design mitigation measures.

From a policy standpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a significant oversight that contributes to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination. Without a robust assessment of alternatives, it cannot be concluded that the proposal constitutes a sustainable or policy-compliant solution.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to deliver a complete and dependable understanding of ecological receptors within the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data provided is incomplete, and the methodologies employed inadequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment does not establish a solid evidential basis for evaluating impacts.

A significant oversight involves otters, a European Protected Species, where the application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. The lack of evaluation regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently examined. This undermines any conclusions drawn about the absence of significant effects on this species.

Additional shortcomings are evident in the assessment of basking sharks, where the reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic

conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to integrate or appropriately consider such data leads to an incomplete baseline and diminishes the credibility of the conclusions presented.

These methodological limitations result in conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of adequate baseline data also hinders meaningful evaluation of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This generates uncertainty concerning the actual scale 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 protected species have not been correctly identified or assessed. The uncertainty introduced prohibits the exclusion of adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant shortcomings, with major gaps in evidence and inconsistencies that undermine its conclusions. The application does not satisfactorily demonstrate that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are in decline, will not be adversely affected. This development is sited within critical foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss are not thoroughly evaluated.

There is a fundamental contradiction in the application; the developer claims no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not adequately supported by the evidence presented. The assessment fails to provide convincing evidence that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. Moreover, the methodologies utilised likely underestimate mortality, particularly given the incomplete baseline data and the insufficient understanding of behavioural responses.

The proposed placement of turbines within a recognised migratory corridor presents an

additional and considerable risk, effectively obstructing a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term implications of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside gaps in data and limitations of the 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 in favour of consent.

Additionally, these identified deficiencies signify a failure to adhere to National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not face adverse effects places the proposal in direct contradiction with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological flaws, and lack of adequate evidence. These deficiencies hinder a comprehensive evaluation of impacts and lead to the overarching 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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks a comprehensive assessment of social impacts, health, and wellbeing, which is crucial for a lawful evaluation. Despite the developer commissioning a Social Impact Assessment that involved local residents in focus groups, the full report has not been published. This creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks highlighted by the developer's own research.

Summaries indicate that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are not speculative in nature. However, the absence of the full assessment limits scrutiny of the findings and constrains the determination of their significance in the decision-making process.

Evidence suggests that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Nonetheless, these impacts have not been adequately incorporated into the main application or afforded appropriate consideration. The non-disclosure of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency directly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when community character and functioning may be at risk. The failure to provide the full dataset means that the application does not present a complete evidential basis for weighing benefits against harm.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and the relationship between landscape, seascape, and cultural heritage is fundamentally flawed, leading to an inadequate representation of the true scale of change and the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, both of which would be severely compromised by the introduction of large-scale turbines near the shoreline. This would create a pervasive industrial presence that fundamentally alters the existing character of the landscape, resulting in a permanent transformation.

The application fails to capture the significant visual changes that would occur. The size and proximity of the turbines would dominate views from residential areas and historic sites, as well as from popular coastal locations. Such domination would have a direct negative effect on visual amenity and would erode the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the severity of these impacts or their importance within the context of this sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This suggests the potential for the visual impact to be understated, calling into question the assessment's overall reliability.

Another significant oversight is the lack of consideration for the interconnected nature of the landscape and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment erroneously treats these sites as isolated elements, failing to acknowledge their interdependence and resulting in a partial evaluation of the impacts on their settings and cultural

significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The extent of the proposed change is incompatible with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. This results in changes that are both fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

Collectively, these shortcomings in the assessment fail to reflect the true scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a dependable evaluation and underscore the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application is materially deficient due to the absence of defined mitigation measures and the lack of detailed management plans. There is an incomplete assessment of construction and pollution risks, which does not provide the necessary detail to evaluate likely environmental effects. The proposal includes substantial seabed preparation and installation works within a high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined mitigation and contingency measures that will only be prepared post-consent, which inhibits any meaningful assessment of their adequacy or effectiveness.

This reliance on future measures raises significant concerns, particularly because of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats, which are vulnerable to disturbances from sediment and potential contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail how these risks will be prevented, controlled, or monitored.

Uncertainty also exists regarding the scale and behaviour of sediment plumes that will arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it remains impossible to determine the extent,

duration, or ecological effects of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Further complicating these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application prevents any evaluation of whether appropriate safeguards are in place to respond to pollution events. This not only introduces procedural risk but also undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed before consent is granted. When such information is lacking, a lawful determination cannot be made. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of these shortcomings—lack of detailed management plans, the absence of defined mitigation measures, and uncertainty regarding potential impacts—renders the assessment inadequate. This prevents a thorough evaluation of construction and pollution risks and supports the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment lacks a thorough evaluation of the ecological and socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem as well as a thriving fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats will be protected or maintained without significant disruption.

A key concern is the assumption made regarding the displacement of fishing activities without acknowledging the potential consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of handling any additional pressure. This absence of information is critical, as displacement could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and the livelihoods they support remain inadequately understood.

Moreover, there are substantial risks posed to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling over a prolonged period is expected to disturb species over considerable distances, including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

The application reveals a glaring inconsistency; it acknowledges the necessity of licences for any harm to European Protected Species, while simultaneously characterising the anticipated impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to a level that necessitates legal authorisation.

Additionally, the assessment overlooks cumulative impacts resulting from multiple pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive analysis of these interconnected effects, it is impossible to gauge the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes significant onshore infrastructure works, such as cabling across protected moorland and the construction of a substation near Stornoway, which requires access through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is known for its ecological sensitivity and status as a significant carbon store. However, the application does not provide a thorough assessment of the impacts associated with these works, leading to an incomplete understanding of the overall environmental footprint of the project.

Furthermore, the assessment of onshore impacts has been excluded or postponed, hindering the proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are evaluated in conjunction, yet the current separation of offshore and onshore elements results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities. This separation is problematic, as it prevents a holistic view of the environmental and socio-economic implications.

Concerns also arise regarding the potential risks to sensitive habitats, including machair systems and peatland environments, which are under policy protection. The application fails to demonstrate that all impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place, resulting in a

notable gap in evidence related to biodiversity protection.

Additionally, the disturbance of peatland associated with the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence of the necessary consents or processes being initiated, which raises questions about the feasibility and legality of implementation.

From a policy standpoint, the fragmented assessment approach undermines the adherence to the National Marine Plan and National Planning Framework 4, as it does not adequately demonstrate the protection of peatlands, habitats, and land use interests. The inability to show that impacts can be avoided or mitigated further weakens the credibility of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect on the western horizon. This change would fundamentally alter the night-time environment.

The application lacks a thorough evaluation of how this lighting might impact visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the area's identity and the growing tourism sector focused on astro-tourism. The absence of these considerations results in a notable deficiency in the overall landscape and environmental evaluation.

Moreover, there has been no assessment of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to the effects of artificial lighting due to phototaxis, which can result in disorientation and a heightened risk of collision. The application fails to include any form of lighting impact assessment or phototaxis study, neglecting to examine how aviation lighting may influence these species or contribute to increased mortality.

This lack of evaluation is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activity or its associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation due to artificial lighting, yet this potential hazard has not been assessed.

The absence of site-specific night-time data creates a substantial void in understanding ecological impacts.

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

From a policy standpoint, this omission contradicts the National Planning Framework 4 concerning 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 an integral aspect of the environment.

Overall, the lack of any assessment regarding dark skies and nocturnal wildlife constitutes a considerable evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of facilitating a lawful determination.

TOURISM

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

The tourism sector has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application neglects to model the potential impacts of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains unclear whether the proposed development would yield a net economic benefit or detract from a well-established and expanding sector.

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

Given the limited economic diversification in this island community, the neglect in assessing tourism impacts carries broader implications for employment, local

businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a substantial evidential shortfall. This deficiency obstructs a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the essential requirements for sustainable development when evaluated against statutory obligations, national policy, and necessary evidential standards. This proposal mirrors the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being presented under a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant shortcomings in the evidential basis for this proposal. It lacks complete and reliable baseline data, relies on an ambiguous design envelope, and depends on unspecified mitigation measures. Furthermore, it omits critical impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is insufficient and fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment constitutes 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 unfit for determination.

The proposal directly contradicts National Planning Framework 4 by failing to demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. It does not illustrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, obscuring potential impacts on

peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been fulfilled, necessitating the application of the precautionary principle and preventing a lawful assertion that impacts are acceptable.

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 connections, and the effects on tourism create permanent impacts that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unfit for determination. The volume of informational deficiencies, combined with policy contradictions and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or utilises the applicable 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.

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: 4F4D6390

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 consideration under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies in material planning, environmental assessment, cultural considerations, and procedural adherence. Situated off the west coast of the Isle of Lewis, the proposed development occupies an area characterised by its Atlantic-facing coastline, relatively untouched natural environment, and a strong cultural identity. Concerns about the scale, proximity, and design of the proposed project call into question its alignment with statutory requirements, national policy directives, and the tenets of sustainable development.

The evidence presented in the application is inadequate for a lawful determination. It lacks critical environmental data, with limited and inconsistent baseline information, and several key elements of the proposal remain undefined. The flexible design framework used complicates the assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures means their effectiveness cannot be properly evaluated. Consequently, the documentation fails to provide a comprehensive understanding of potential environmental, cultural, or community impacts, leaving assertions of negligible or non-significant effects unsupported by credible evidence.

There are notable conflicts with established policy frameworks. The proposal appears to violate provisions of the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies directly affect the statutory tests necessary for obtaining consent, jeopardising the competent authority's ability to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposal, which includes large turbines positioned near the shoreline, raises significant concerns about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy discrepancies indicates that the application is incomplete and incapable of facilitating a lawful determination. Given these circumstances, it is essential that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency, failing to reliably detail the expected environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This approach hampers the ability to apply a worst-case scenario consistently, thereby undermining the assessment's integrity. Consequently, the impacts outlined may not accurately reflect the final development, which hinders both public and competent authority understanding of the actual environmental effects.

The application is significantly dependent on undefined mitigation measures, monitoring strategies, and management plans, which remain unestablished at this stage. As consent is being sought based on the premise that environmental harm will be addressed later, this prevents any substantive evaluation of the effectiveness of these measures or a proper assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally inappropriate and conflicts with the fundamental aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly defined prior to determination.

Additionally, there are marked evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This creates uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are concluded without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that are incompatible with statutory requirements.

As a result, the application does not satisfy the evidential standards mandated under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been established that the impacts have been thoroughly assessed or that sufficient safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies preclude a lawful and rigorous assessment of environmental effects, placing the competent authority in a position where it cannot responsibly determine the application based on the information that has been presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species presents significant shortcomings, resulting in an incomplete understanding of the ecological receptors within the West Lewis coastal environment. This marine system is notably sensitive and biologically active. However, the baseline data is inadequate, and the methodologies

employed do not effectively capture essential aspects such as species presence, behaviour, and habitat utilisation. Consequently, there is insufficient evidential support for evaluating potential impacts.

A significant oversight pertains to otters, classified as a European Protected Species, as the application does not adequately recognise or assess their active use of coastal regions for foraging and movement. The failure to account for their core foraging range and behavioural patterns leads to an incomplete assessment of potential impacts from construction disturbances, noise, and increased activity. This shortcoming undermines the conclusions regarding the absence of significant effects on this species.

Further concerns arise from the assessment of basking sharks, where reliance on aerial surveys introduces a notable detection bias, particularly in the challenging Atlantic conditions. This method is likely to underreport their presence, especially when compared to established land-based observations that show frequent activity in these waters. The disregard for such data results in a flawed baseline, weakening the reliability of the conclusions drawn.

The methodological shortcomings indicate that assertions of negligible or non-significant effects stem from assumptions rather than solid evidence. The lack of comprehensive baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty generated prevents the elimination of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, the granting of consent cannot be justified legally.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its conclusions. The presence of internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing decline, raises serious concerns. Despite this, the application does not adequately demonstrate that these species will not suffer adverse effects. Key foraging areas and migratory pathways are directly impacted by the development, yet the assessment fails to thoroughly evaluate the potential risks of displacement, collision, and habitat loss.

A notable contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not adequately considered, and the reliance on modelling approaches introduces a degree of uncertainty, particularly concerning severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in instances where baseline data is lacking and the behavioural responses of the species are not fully understood.

Moreover, the placement of turbines within a designated migratory corridor significantly heightens the risk to avian populations, effectively creating a barrier along a primary flight path that species use while migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term repercussions of sustained mortality in this corridor, nor does it consider the implications for species with relatively small global populations.

From a regulatory standpoint, the application falls short of the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thereby hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological shortcomings, and inadequate evidence. These issues preclude a comprehensive evaluation of impacts and support the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is severely lacking, particularly in its failure to recognise the West Lewis coastline as a vibrant cultural landscape deeply intertwined with language, tradition, environment, and community. The application adopts a simplistic view, treating heritage merely as a collection of disconnected, unchanging assets rather than acknowledging their active social, cultural, and spiritual roles in the lives of the community.

There is a notable shortcoming in how culturally significant sites, including the

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full Social Impact Assessment has not been published, resulting in a significant evidential gap that hinders the public and the competent authority from grasping the complete extent of social risks identified by the developer's research. Despite the developer commissioning a Social Impact Assessment that included focus groups with local residents, the lack of transparency around the full report obstructs proper scrutiny of its findings.

Available summaries reveal that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from

direct engagement and are thus grounded in reality, not speculation. However, the inability to review the full assessment limits the capacity to evaluate the significance of these effects in the decision-making process.

The proposal is viewed as a threat to community identity and cohesion, with indications of “cultural loss” highlighted in the developer’s own findings. Nevertheless, these adverse impacts have not been adequately integrated into the main application, which is a serious oversight. The non-disclosure of the comprehensive Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when community character and functioning are at stake. The application fails to provide a complete evidential basis for assessing the balance between benefits and potential harm, largely due to the absence of the full dataset.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments must facilitate positive health outcomes and mitigate harm, yet the evidence available points to existing adverse effects that remain undisclosed. Without access to the complete assessment, compliance with this policy cannot be substantiated.

The procedural ramifications are considerable. The competent authority is unable to carry out a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission represents a material gap in the application and a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In conclusion, the combination of the withheld full Social Impact Assessment and evidence of existing negative impacts renders the assessment both incomplete and unreliable. This situation hampers a lawful determination and underscores the inadequacy of information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual, landscape, and seascape impacts is significantly lacking and does not sufficiently address the scale of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by an unobstructed Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The proposal to install large-scale turbines in close proximity to the shore would establish a continuous and prominent industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

The application inadequately conveys the extent of the visual changes that would

occur. Given the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would detrimentally affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment fails to adequately express the significance of these impacts within such a sensitive landscape context.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. There is evidence suggesting that the viewpoints chosen may not represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and landscapes of high value. This raises the possibility that the scale of visual impact has been downplayed, which undermines the credibility of the assessment.

Moreover, there is a significant shortcoming in the assessment's failure to analyse the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, resulting in a deficient evaluation of their impact and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are appreciated and breaking their connection to the natural horizon. This represents not only a visual concern but also a deeper cultural and spatial detriment that the application has not sufficiently addressed.

From a policy standpoint, the proposal directly contradicts the principles outlined in National Planning Framework 4, particularly regarding the safeguarding of natural environments and historic assets. The extent of change proposed is incompatible with the imperative to protect landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case analysis further challenges any assertions of policy conformity.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be prominent and inescapable. Thus, the resulting changes are fundamentally permanent, rather than reducible to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to properly assess construction and pollution risks, which is particularly troubling given the sensitivity of the receiving environment. The West Lewis coastline, characterised by clean coastal waters and important

habitats, is at risk from potential sediment disturbance and contamination. While the application acknowledges hazards such as sediment mobilisation and accidental chemical or oil spills, it fails to outline how these risks will be prevented, controlled, or monitored.

Concerns are heightened by the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are set to be prepared after consent is granted, which obstructs any meaningful assessment of their adequacy or effectiveness. This deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be evaluated before consent can be granted.

Moreover, there is significant uncertainty regarding 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 ramifications of these impacts. This uncertainty also extends to potential effects on marine species and habitats identified as sensitive in broader assessments.

The lack of detailed emergency response procedures exacerbates these issues, as the postponement of contingency planning to a post-consent stage hampers the evaluation of whether adequate safeguards are in place to deal with pollution incidents. Consequently, this introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures effectively at the point of determination.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainties regarding potential impacts results 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 assessment of marine life and fisheries associated with this application is inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the application does not convincingly demonstrate how these vital uses and habitats can be safeguarded from significant disruption.

A major concern is the flawed assumption that fishing activities can be relocated without negative effects. The submission does not provide evidence of alternative fishing grounds that are available, accessible, or capable of sustaining increased pressure. This gap is critical; displacement could lead to overfishing in other areas, potentially resulting in broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the implications for fisheries and

local livelihoods remain poorly understood.

The proposal also poses considerable threats to marine species, particularly due to the underwater noise generated during the construction phase. The use of high-energy hammer piling over an extended duration is expected to cause disturbances across considerable distances, impacting species like dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises urgent concerns, yet the application minimises the gravity of these effects without adequate supporting evidence.

Moreover, there exists an inconsistency within the application regarding the requirement for licences to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where harm is anticipated to necessitate legal authorisation.

The assessment also neglects to evaluate cumulative impacts resulting from various pressures such as habitat disturbance, noise, and fishing displacement. A comprehensive analysis of these combined effects is essential for determining the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project is fundamentally flawed, particularly concerning the evaluation of onshore infrastructure. It fails to address the full scope of impacts that arise from what constitutes a single integrated project. The assessment of the offshore turbines and onshore works is conducted separately, resulting in a disjointed approach that obscures the true magnitude of environmental and socio-economic consequences.

Onshore activities encompass cabling through protected moorland, the construction of a substation in proximity to Stornoway, and the establishment of associated access infrastructure across sensitive landscapes. Such works involve the excavation of deep peat areas, especially within Barvas Moor, which serves as a significant carbon reservoir and is an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, thus hindering a complete understanding of the overall

environmental footprint of the project.

The proposal raises serious concerns regarding carbon balance, as the disturbance of peatland can release stored carbon, leading to a potential carbon debt that contradicts the principles of renewable energy development. The application does not sufficiently address this matter nor does it demonstrate that the overall carbon balance remains advantageous. Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application does not supply evidence that the requisite consents or processes have been initiated, which calls into question the deliverability and lawful implementation of the project.

Moreover, the absence of a comprehensive assessment prevents an accurate evaluation of cumulative effects, which is required under the Environmental Impact Assessment process. The separation of offshore and onshore components means that the combined impacts on peatlands, habitats, and communities remain inadequately understood. There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are under policy protection. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been adopted, resulting in a clear evidential gap concerning biodiversity protection.

From a policy standpoint, the failure to consider the project in its entirety and to show protection of peatlands, habitats, and land use interests contravenes the National Marine Plan and the National Planning Framework 4. The inability to prove that impacts can be effectively avoided or mitigated further weakens the application. Collectively, the separation of project elements, lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, thus 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.

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 proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the essential criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application revisits the fundamental issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal does not adequately address these critical concerns.

Significant gaps in baseline data and the continued use of an undefined design envelope undermine the reliability of the application. Additionally, it 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, obstructing a comprehensive understanding of potential significant effects or residual impacts.

There are notable procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment is a material omission. These deficiencies hinder the competent authority from accurately assessing the impacts on community wellbeing, cultural identity, and

economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, failing to illustrate the protection of biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore elements has not been adequately evaluated, obscuring implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unsuitable for determination. The multitude of information deficiencies, combined with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the necessary regulatory provisions to mandate the submission of the missing information.

In light of these issues, 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: 018A020C

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 marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and associated documentation 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 renowned for its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural identity. The design, proximity, and scale of the proposal raise serious questions about its alignment with statutory obligations, national policies, and sustainable development principles.

The application does not present a sufficient evidential basis for a lawful decision. There are gaps in critical environmental data, the baseline information provided is both limited and inconsistent, and many crucial elements of the proposal remain undefined. The flexible design framework employed obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to allow for a comprehensive understanding of the environmental, cultural, or community implications, and the assertions of negligible or non-significant effects lack robust evidential support.

There are evident and significant policy discrepancies as well. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment guidelines, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate that national obligations to safeguard biodiversity, climate considerations, and environmental integrity are achievable. Such discrepancies directly impact the statutory tests needed for consent and compromise the ability of the competent authority to determine the proposal's acceptability under policy frameworks.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and cannot substantiate a lawful determination. In light of these factors, the precautionary principle is imperative.

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.

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough assessment of alternatives, failing to adhere to the statutory requirements of the Environmental Impact Assessment regime. It does not offer a structured, reasoned comparison of realistic alternatives based on their environmental effects. Instead, it presents a narrative regarding the project's development, which does not adequately demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

There is no evidence-based or transparent comparison of alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate 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, the lack of such analysis obstructs any conclusion that the proposed siting is the least damaging option.

Additionally, the deficiencies extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The absence of a clear avoidance strategy, coupled with the lack of comparative analysis, illustrates that mitigation by design has not been implemented. Instead, reliance appears to be placed solely on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, these deficiencies compromise compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development's assessment of marine ecology and protected species is significantly flawed, leading to an unreliable understanding of ecological receptors within the West Lewis coastal environment. This area is recognised as a biologically active and sensitive marine system. However, the baseline data provided is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable gap in the assessment concerns otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the possible effects of construction disturbance, noise, and increased activity have not been sufficiently evaluated. Such shortcomings undermine any claims about the absence of significant

effects on otters.

Additionally, the assessment of basking sharks presents further deficiencies. The reliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions, which likely leads to an underestimation of their presence. This is particularly evident when comparing the aerial survey results with established land-based observations that indicate frequent use of these waters. The failure to include or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological limitations present throughout the assessment mean that assertions of negligible or non-significant effects are based on assumptions rather than on robust evidence. Furthermore, the lack of sufficient baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as there has been inadequate identification and assessment of protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of 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 hinder a thorough evaluation of the impacts on marine ecology and protected species and contribute to the conclusion that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided is fundamentally unreliable, characterised by significant internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. Notably, the application does not adequately demonstrate that the internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not face adverse effects from the proposed development. Critical foraging areas and migratory pathways are situated within the development site, yet the assessment fails to thoroughly evaluate the risks associated with displacement, collision, and habitat loss.

Moreover, the application contains a striking contradiction, where the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated, thereby raising serious questions about the reliability of the assessment and suggesting that its conclusions lack the support of adequate evidence. The assessment does not sufficiently address the potential impacts on

seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. It inadequately accounts for the critical importance of these feeding grounds and relies on modelling techniques that introduce significant uncertainty, particularly for species facing severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor adds further risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor have not been properly assessed, nor have the potential impacts on species with small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and limitations in modelling means that the required standard of beyond reasonable scientific doubt has not been attained. This situation engages the precautionary principle and precludes a lawful conclusion in favour of consent. Additionally, these identified deficiencies indicate non-compliance with the National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct opposition to national policy.

In summary, the assessment's shortcomings undermine a robust evaluation of potential impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage presents significant deficiencies that undermine its credibility. Notably, the application overlooks the West Lewis coastline as a vibrant cultural landscape, wherein the environment, language, tradition, and community are interconnected. Instead of acknowledging the dynamic and ongoing significance of heritage, it adopts a limited perspective, viewing cultural sites merely as isolated and static entities.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet the assessment reduces them to mere static features without recognising their continuing use and importance within community life. This failure to accurately characterise these sites leads to an incomplete evaluation of the cultural impacts and neglects their roles in the ongoing experiences of the community.

Moreover, the assessment disregards intangible cultural heritage, which encompasses the Gaelic language, traditions, and the community's long-standing relationship with the coastal environment. These elements are pivotal to the area's identity but have

been entirely overlooked, indicating a major omission. The lack of consideration for these aspects renders the cultural impact of the proposed development impossible to fully comprehend.

Further complicating matters are concerns regarding community rights and engagement. The Gaelic-speaking population identifies with a distinct cultural identity that possesses characteristics associated with Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent undertaken, which raises serious questions about the engagement's legitimacy and violates accepted principles of participatory decision-making concerning cultural and environmental matters.

A significant procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, as mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic ramifications for the island community, which in itself is a substantial flaw.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, particularly regarding the preservation of historic assets and places. By neglecting both tangible and intangible heritage and failing to acknowledge living cultural practices, the application strays from established policy requirements.

In summation, the neglect of living heritage, intangible cultural values, community rights, and statutory duties culminates in a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not afford a reliable foundation for determining the actual cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the complete Social Impact Assessment fundamentally undermines the assessment of social impacts, health, and wellbeing, leaving it materially deficient and lacking the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This represents a significant evidential gap, impeding both public understanding and the competent authority's ability to grasp the full extent of the social risks identified in the developer's own research.

Available summaries reveal that residents are currently facing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposed development. These effects are based on direct engagement with the community and are therefore not speculative in nature. However, the non-disclosure of the full assessment restricts proper scrutiny of these findings and limits the assessment of their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” identified as an issue within the developer’s own findings. Nonetheless, these concerns have not been adequately integrated into the main application or assigned appropriate weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when the character and functioning of the community may be at stake. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance between the proposed benefits and potential harm.

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

The procedural ramifications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment, marking a material omission within the application and a failure to satisfy the evidential requirements set forth 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 hinders the possibility of a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create an industrial presence that would fundamentally alter this character, resulting in a permanent transformation of the landscape. The assessment of seascape, landscape, and visual impacts fails to adequately represent the magnitude of visual change expected from this development. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, which directly impacts visual amenity and undermines the defining qualities of naturalness and remoteness.

Concerns regarding the methodology used for selecting and presenting visual viewpoints further exacerbate the deficiencies in the application. Evidence indicates that these viewpoints may not capture the most sensitive receptors or worst-case

scenarios, particularly concerning key cultural heritage sites and significant landscapes. This suggests that the assessment has understated the visual impacts, casting doubt on its reliability.

Moreover, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated assets, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connections to the natural horizon. This represents a broader cultural and spatial harm that the application has not adequately assessed.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The scale of proposed change does not align with the requirement to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment undermines any claims of compliance with policy.

It is evident that the impacts identified in the assessment cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. The anticipated change is fundamental and permanent, making it unlikely that any mitigation measures could reduce the impacts to an acceptable level.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks is inadequate, lacking the necessary detail to evaluate the potential environmental effects associated with the proposal. This initiative entails significant seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it leans on mitigation and contingency measures that would only be formulated after consent has been granted, thereby obstructing any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures raises serious concerns, particularly considering the sensitivity of the receiving environment. The coastline of West Lewis is home to clean coastal waters and critical habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide adequate

details on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, determining the extent, duration, or ecological consequences of these impacts is unfeasible. This uncertainty also applies to potential effects on marine species and habitats already identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application hampers the evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant likely effects and mitigation strategies must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. The application also fails to illustrate compliance with policy requirements regarding environmental protection and water quality.

Overall, the absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment fundamentally deficient. These shortcomings impede a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment fails to provide a thorough evaluation of fisheries and marine life, lacking a robust analysis of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these habitats and activities can be safeguarded from significant disruption.

A critical flaw lies in the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to suggest that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This significant oversight increases the risk of overfishing in other areas, which could have broader economic repercussions for the local fishing fleet. Without a sound and evidence-based evaluation, the effects on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling for an extended duration is expected to cause disturbances over large

distances, negatively impacting species such as dolphins. The anticipated disruption to a considerable proportion of the local bottlenose dolphin population raises serious concerns; yet, the application minimizes the significance of these effects without adequate supporting evidence.

There is a notable inconsistency in the application, which acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction undermines the reliability of the assessment and raises questions about adherence to the Habitats Regulations, especially where harm is expected to a degree that warrants legal authorisation.

Furthermore, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential, as it is critical to understanding the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines alongside the onshore works fails to provide a complete picture, as it treats these components separately despite their intrinsic connection. This fragmented approach obscures the full extent of environmental and socio-economic impacts of what is essentially a single integrated project. The onshore works entail cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. Notably, excavation activities will take place in areas of deep peat, particularly within Barvas Moor, which is crucial both as a significant carbon store and as an ecologically sensitive habitat. The absence of a comprehensive assessment of these impacts prevents a thorough understanding of the overall environmental footprint of the project.

Moreover, the application's exclusion or deferral of onshore impacts hampers the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the disjointed assessment of offshore and onshore elements leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

Significant risks to sensitive habitats, such as machair systems and peatland environments, have not been adequately addressed, which raises concerns regarding biodiversity protection and compliance with policy requirements. The application does not provide evidence that the impacts on these habitats have been fully assessed or that effective avoidance measures have been implemented, thus presenting a clear evidential gap.

The proposal further generates concerns around carbon balance, as the disturbance of peatland could release stored carbon, creating a carbon debt that contradicts the goals of renewable energy development. The failure to adequately address this aspect or to demonstrate that the overall carbon balance remains beneficial is a critical oversight. Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence that the necessary consents or processes have been initiated, which casts doubt on the deliverability and lawful implementation of the project.

From a policy standpoint, the disjointed assessment of the project as a whole undermines the protection of peatlands, habitats, and land use interests, conflicting with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated adds further weakness to the application. In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

Crucially, the assessment does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is especially concerning given the emerging significance of astro-tourism in the region. The failure to address these impacts creates a notable gap in the overall environmental and landscape assessment.

Moreover, the application neglects to assess the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species and their mortality risk remain unexamined.

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

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

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

In summary, the failure to conduct an assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unsuitable for a lawful determination.

TOURISM

The application presents a significant evidential gap by failing to adequately assess tourism impacts, which are vital for the Isle of Lewis economy. Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the assessment does not quantify how large-scale offshore infrastructure would affect visitor numbers, behaviour, or the overall economic contribution to the region.

The tourism sector is fundamentally reliant on the natural assets of the area, including its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it fails to consider the potential impact of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added and the wider economic resilience of the community. Without such critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and growing sector.

Moreover, the assessment overlooks the crucial role that environmental quality plays in supporting tourism, particularly regarding unspoiled landscapes and dark skies that enhance visitor experiences. The lack of a Dark Skies Assessment further highlights this deficiency, leaving a void in the understanding of impacts on emerging markets, including nature-based tourism and astro-tourism.

In an island community characterised by limited economic diversification, the inadequate evaluation of tourism impacts poses broader implications for employment, local businesses, and overall community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been adequately addressed, contrary to the 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, particularly concerning economic impact and the necessity to illustrate net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector, and fails to provide enough evidence for the competent authority to properly assess the economic consequences of the proposal.

In summary, the combined failures to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic dependency culminate in a significant shortfall in the analysis, undermining the robustness of the evaluation of economic effects and leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the principles of sustainable development as defined by statutory duties and national policy. This application mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was a central concern. Now, despite a policy framework that places increased emphasis on biodiversity, peatland preservation, landscape integrity, and community welfare, the application falls short.

There are substantial gaps in the evidential basis necessary for a thorough determination. Baseline data is incomplete, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Key impact pathways have been omitted, such as those concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, hindering a complete understanding of potential significant effects or residual impacts.

Moreover, procedural failures are apparent. The lack of a compliant Island Communities Impact Assessment breaches the statutory obligations outlined in the Islands (Scotland) Act 2018, and the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal directly contradicts the principles set forth in National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or

cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to missing tourism impact assessments. Additionally, the cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in certain areas. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

The proposal would also 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 negative effects on tourism represent lasting consequences that cannot be mitigated adequately.

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

Additional Comments

I am writing to formally object to the proposed N4 wind farm development off the Isle of Lewis. While I recognise the importance of renewable energy in addressing climate change, I believe this proposal raises serious and unresolved concerns across environmental, cultural, and community dimensions.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment does not provide sufficient confidence that the full scale, duration, and cumulative effects of the development have been properly understood. There are gaps in baseline data, limited long-term modelling, and insufficient consideration of worst-case scenarios. A project of this magnitude requires a far more rigorous and precautionary approach.

ASSESSMENT OF ALTERNATIVES

There appears to be inadequate exploration of alternative sites, designs, or technologies that could deliver renewable energy with less harm. The absence of a clearly demonstrated least-impact option raises concerns that this location has been selected for convenience rather than suitability.

MARINE ECOLOGY AND PROTECTED SPECIES

The waters around Lewis are ecologically rich and sensitive. There is significant uncertainty regarding the impacts on marine mammals, benthic habitats, and

protected species. Noise, vibration, and habitat disruption during construction and operation could have lasting and potentially irreversible effects.

ORNITHOLOGY AND SEABIRD IMPACTS

The area is internationally important for seabirds. Collision risk, displacement, and disruption to feeding patterns are serious concerns that have not been convincingly mitigated. The long-term population-level impacts on vulnerable species remain unclear.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The seascape and natural environment of Lewis are deeply tied to cultural heritage and identity. Industrialising this landscape seriously risks eroding a sense of place that has been shaped over generations. This is not simply a visual issue, but a cultural and emotional one.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

Large-scale developments can have significant social consequences, including stress, depression through an erosion of one's self identity in an area where it is closely tied to the landscape, and can lead to breakdown in the health of the fabric of the community affected through the cumulative effect on individuals, in an area in which individuals and communities already face many challenges in maintaining their way of life.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The visual impact of offshore turbines, associated infrastructure, and onshore connections would fundamentally alter the character of the area. The cumulative effect alongside existing and proposed developments has not been adequately addressed.

CONSTRUCTION AND POLLUTION RISKS

Construction brings risks of pollution, sediment disturbance, and accidental damage to fragile ecosystems. The scale and complexity of offshore construction increase the likelihood of unintended environmental harm.

FISHERIES AND MARINE LIFE

Local fisheries are an essential part of the economy and way of life. Disruption to fishing grounds, changes in marine ecosystems, and restricted access could have lasting economic and ecological consequences.

ONSHORE INFRASTRUCTURE: HIDDEN IMPACTS

The full impact of onshore infrastructure, including substations, cabling, and access routes, is often underestimated. These elements extend the footprint of the project and can significantly affect communities and landscapes inland.

DARK SKIES AND NOCTURNAL WILDLIFE

Lewis is known for its dark skies, which are increasingly rare and valuable. Lighting associated with the development could degrade this environment and disrupt nocturnal wildlife patterns.

TOURISM

Tourism relies heavily on the natural beauty, tranquillity, and distinctiveness of the area. Industrial development on this scale risks undermining one of the island's key economic pillars.

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In conclusion, I urge decision-makers to take a precautionary approach. The burden of proof should lie with demonstrating that this development will not cause unacceptable harm. Based on the current evidence, that threshold has not been met.

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: 26AF4000

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

Dear Sir/Madam

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

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The inadequacy of the assessment of alternatives fundamentally undermines compliance with the statutory requirements of the Environmental Impact Assessment regime. The application fails to provide a structured and reasoned comparison of realistic alternatives based on environmental effects, instead offering a narrative account of the project's evolution. This method does not adequately illustrate that less harmful options have been identified, assessed, and chosen over more damaging

solutions.

In terms of alternative offshore locations, development scales, or design configurations, the application lacks a transparent or evidence-based comparison. Notably, it does not show that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be significantly reduced. The sensitive nature of the West Lewis coastline and the critical role of proximity to shore in determining impact highlight the shortcomings of the analysis, making it impossible to conclude that the proposed siting is the least damaging option available.

Moreover, the deficiencies extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation through design has not been adequately employed, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This shortfall indicates a failure to adhere to the established mitigation hierarchy, leaving the competent authority unable to ascertain whether there are less harmful and more suitable alternatives. In the absence of a robust alternatives assessment, it is impossible to conclude that the proposal represents a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies, failing to deliver a comprehensive or trustworthy understanding of ecological receptors in the West Lewis coastal environment, which is known to be a sensitive and biologically rich marine system. The incomplete baseline data and inadequate methodologies fail to capture essential aspects of species presence, behaviour, and habitat use. Consequently, this leads to an unreliable evidential basis for evaluating potential impacts.

One critical gap in the assessment involves otters, classified as a European Protected Species. The application does not adequately recognise or assess their active usage of coastal regions for foraging and movement. The disregard for their core foraging ranges

and behavioural patterns results in an insufficient evaluation of the potential effects of construction disturbance, noise, and increased human activity, ultimately compromising the conclusions regarding the absence of significant effects on this species.

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

The methodological shortcomings mean that findings of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, which includes seasonal variations and broader ecosystem interactions. This uncertainty clouds the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species have not been properly executed. The uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, it is unlawful to grant consent.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are connected. However, the assessment of cultural heritage and community identity is inadequate. It treats heritage as isolated and static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are active places of burial and spiritual practice. Yet, they are categorised as static features in the assessment, which fails to consider their continued use and the development's impact on their setting. This mischaracterisation leads to an incomplete understanding of cultural effects and disregards their importance to community life.

Additionally, the assessment neglects intangible cultural heritage like the Gaelic language and traditions, as well as the community's longstanding relationship with the coastal environment. These elements are central to the area's identity but are entirely absent from the evaluation, resulting in a significant oversight. Without addressing

these factors, the true cultural impact of the development cannot be grasped.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has not been consulted through a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and does not adhere to established principles of participation concerning cultural and environmental interests.

Moreover, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. This omission hinders the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination.

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

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not sufficiently support an evaluation of the true cultural cost of the proposal.

CONSTRUCTION AND POLLUTION RISKS

The proposal is fundamentally flawed due to an incomplete assessment of construction and pollution risks, which hampers the ability to evaluate the likely environmental effects adequately. It entails significant seabed preparation and installation within a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it leans heavily on mitigation and contingency measures that are to be formulated after consent, which precludes any substantial assessment of their adequacy or effectiveness.

This reliance on unspecified future actions raises serious concerns, particularly in light of the sensitivity of the environment being affected. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be mitigated, controlled, or monitored.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these disturbances. This uncertainty also extends to potential impacts on marine species and habitats that have already

been identified as sensitive within the broader assessment.

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing the planning for contingencies to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are in place to tackle pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. It is imperative that likely significant effects and their mitigation be evaluated before consent is granted, and the absence of this information renders a lawful determination impossible. Additionally, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of detailed management plans, and uncertainty regarding potential impacts signifies a materially deficient assessment. These deficiencies inhibit a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application regarding the project is fundamentally flawed, as it does not provide a complete assessment of onshore infrastructure. The offshore turbines are closely connected to the onshore works, yet these elements have been evaluated separately. This fragmented approach masks the true extent of the environmental and socio-economic impacts that this integrated project will have.

Key onshore components involve extensive cabling across protected moorland and the construction of a substation near Stornoway, along with necessary access routes that traverse sensitive landscapes. Excavation activities are set to occur across deep peat areas, particularly within Barvas Moor, which serves as a significant carbon store and a habitat of ecological importance. The lack of a thorough assessment regarding these impacts results in an incomplete understanding of the project's overall environmental footprint.

Crucially, the omission or postponement of onshore impact assessments obstructs the ability to fully evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be examined collectively. However, the current separation of offshore and onshore elements leaves a gap in understanding the combined effects on peatlands, habitats, and local communities.

Moreover, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are designated for protection under policy

frameworks. The application fails to convincingly demonstrate that these impacts have been thoroughly assessed or that suitable avoidance measures have been implemented. This creates a significant evidential shortfall concerning biodiversity protection.

Concerns are also raised regarding the carbon balance involved in this proposal. Disturbance of peatland areas leads to the release of stored carbon, potentially resulting in a carbon debt that counters the goals of renewable energy advancement. The application inadequately addresses this critical issue or provides assurance that the overall carbon balance remains favourable.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence indicating that the necessary consents or processes have been initiated, leading to uncertainty about the project's feasibility and lawful execution.

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

In conclusion, the separation of project components, the absence of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts culminate in a submission that is incomplete and unreliable. This situation precludes a lawful determination of the project.

TOURISM

The application acknowledges that a substantial 86% of visitors are attracted to the Isle of Lewis due to its stunning scenery, yet it lacks a detailed assessment of how large-scale offshore infrastructure could influence visitor numbers and overall economic contributions. Tourism is intrinsically linked to the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness, which all play a critical role in the visitor experience. The absence of a thorough analysis raises serious concerns about the potential economic and social repercussions for this vital sector.

Tourism on the Isle of Lewis has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to model the implications of the industrialisation of the seascape and the consequent loss of environmental quality on Tourism Gross Value Added and overall economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would result in a net economic benefit or jeopardise an already thriving sector.

Moreover, the importance of environmental quality in sustaining tourism has been overlooked. The significance of unspoiled landscapes and dark skies cannot be underestimated, particularly regarding emerging markets like 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 facet of the local economy.

Given the limited economic diversification of this island community, neglecting 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 properly evaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, especially regarding economic impact and the necessity to provide evidence of net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the failure to quantify tourism impacts, to assess the environmental drivers of visitor behaviour, and to consider 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 remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and does not meet the requirements of sustainable development as outlined in statutory duties and national policy. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal still fails to address these concerns adequately.

There are significant gaps in the evidential basis for the proposal. It does not include comprehensive baseline data and continues to utilise an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and omits critical impact pathways, such as those related to nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, limiting the understanding of likely significant effects and residual impacts.

Procedural issues also mar the application. The lack of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts with the National Planning Framework 4 as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to

establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling has not been conducted. The assessment of the cumulative impact from both offshore and onshore elements is inadequate, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority should refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Additional Comments

Marine environments as rich as this are rare and must be protected and building wind farms in it will inevitably damage it.

Feeding more wind generated into an overloaded network, even an expanding one, is physically and financially inefficient. We need electricity that is consumed where it is produced.

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: 8F846F20

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a thorough review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The reliance on an undefined design envelope and the absence of specified mitigation measures critically undermine the Environmental Impact Assessment Report. This

report is materially deficient, failing to provide a comprehensive, transparent, or reliable account of the potential environmental effects associated with the proposal. By introducing significant uncertainty, the flexible Project Design Envelope prevents a consistent application of a worst-case scenario, which raises concerns about the integrity of the assessment. Consequently, the impacts outlined may not accurately reflect what will be constructed, leaving both the public and the competent authority unaware of the true extent of environmental effects.

Furthermore, the application seeks consent based on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach defers essential information to post-consent stages, obstructing a meaningful evaluation of their effectiveness or the assessment of residual impacts. Such procedural shortcomings conflict with the purpose of the Environmental Impact Assessment regime, which demands that significant effects and mitigation measures be established clearly before any determination can take place.

There are notable evidential deficiencies present, including gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot align with statutory requirements.

Due to these inadequacies, the application does not satisfy the evidential threshold established under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate alignment with National Planning Framework 4, notably concerning biodiversity protection and environmental integrity, as it does not show that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the Environmental Impact Assessment Report's deficiencies—including its reliance on an unspecified design envelope, the lack of defined mitigation measures, and gaps in baseline data—render it unreliable and incomplete. These flaws hinder a lawful and rigorous assessment of environmental effects and leave the competent authority unable to make a well-informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within this application is fundamentally inadequate and does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a systematic, evidence-based comparison of feasible alternatives with respect to their environmental impacts, the application presents a narrative on project evolution that lacks substance. This method fails to show that less harmful options have been properly identified and evaluated in preference to more

damaging solutions.

There is a distinct lack of transparency regarding the examination of alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has genuinely contemplated positioning turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. Given the sensitivity of the West Lewis coastline, as well as the critical role that proximity to shore plays in determining impact, the absence of such an analysis means it cannot be concluded that the proposed siting represents the least damaging option.

The inadequacies also extend to the cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been thoroughly investigated to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis demonstrates that mitigation by design has not been properly employed, leading to reliance on post-design mitigation measures.

Consequently, the application does not adequately show that environmental harm has been minimised through site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy and hinders the competent authority from determining whether more suitable and less harmful alternatives are available. In the absence of a thorough alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency jeopardises compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that leads to the overarching conclusion that the application has not undergone adequate assessment and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is significantly inadequate, failing to provide a thorough and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This region is characterised by its sensitivity and biological activity, yet the methodologies used lack the ability to fully capture species presence, behaviours, and habitat usage, leading to an incomplete baseline data set. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Notably, the assessment neglects to adequately identify and evaluate otters, which are classified as a European Protected Species. The application does not recognise their active utilisation of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to a significant oversight in assessing the potential effects of construction-related disturbances, noise, and

increased activity. This omission undermines the conclusions drawn regarding the absence of significant effects on otters.

Additionally, the evaluation of basking sharks is problematic, as it relies heavily on aerial surveys that introduce notable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially in comparison to established land-based observations that indicate their frequent use of these waters. The failure to integrate or adequately consider such data results in a deficient baseline and diminishes the reliability of the conclusions reached.

Due to these methodological shortcomings, the conclusions asserting negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual scale of risks to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the application is flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to demonstrate to the required evidential standard that these species will not be adversely affected. Key foraging areas and migratory pathways have been identified in the development site, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss for these birds.

A fundamental contradiction exists in the application, where the developer claims there are no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is typically necessary only if significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the evidence presented. Furthermore, there is insufficient evidence regarding the potential impact on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The assessment does not

fully account for the significance of these feeding grounds, and the use of modelling approaches introduces additional uncertainty, particularly for species experiencing severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor creates a significant risk by effectively constructing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application has not properly assessed the long-term implications of sustained mortality in this corridor or the potential effects on species that have relatively small global populations.

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

Additionally, the identified deficiencies signify a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy. In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, all of which preclude a robust evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are intrinsically connected. However, the assessment of cultural heritage and community identity is fundamentally inadequate, failing to recognise this complexity. It adopts a reductive approach, treating heritage as isolated, static assets without acknowledging their ongoing social, cultural, and spiritual functions within the community.

A significant shortcoming lies in the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mistakenly categorised as static features. This mischaracterisation fails to take into account their continued use and meaning, neglecting the impacts of development on their setting. As a result, the evaluation of cultural effects remains incomplete, overlooking their vital role in community life.

Moreover, the assessment fails to address intangible cultural heritage, such as the Gaelic language and traditions, which are essential to the area's identity. This omission significantly diminishes the understanding of the cultural impact of the development.

The Gaelic-speaking population, recognised as an Indigenous People, possesses distinct cultural characteristics, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment, disregarding established principles of participation in decisions affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018, represents a critical procedural failure. Without this assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the recognition of living cultural practices, clearly departs from policy requirements. Consequently, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The application does not provide a sufficient basis for understanding the true cultural cost of the proposal, and the cultural impacts of the development have not been adequately assessed.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report has not been published, creating a significant evidential gap. This omission hinders both public understanding and the competent authority's ability to assess the extent of social risks identified through the developer's research. Available summaries suggest that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, not speculation, but the lack of transparency surrounding the full assessment limits proper scrutiny of these findings.

Moreover, there is an indication that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these critical impacts have not been adequately integrated into the main application or assigned appropriate weight. The failure to disclose the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this scale, especially when community character and functioning may be at risk. By withholding the complete dataset, the application lacks 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 concerning health and wellbeing. Development is required to foster positive health outcomes and avoid negative impacts, yet available evidence indicates existing adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy cannot be confirmed.

The procedural consequences of this situation are considerable. The competent authority cannot carry out a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This absence signifies a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse effects, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual impacts, seascape, and landscape is insufficient and does not properly account for the significant changes or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed large-scale turbines situated near the shoreline would introduce a pervasive industrial presence, drastically changing this character and leading to an irreversible transformation of the landscape.

The application fails to accurately depict the extent of this visual alteration. Due to the scale and proximity of the turbines, they would dominate sightlines from residential areas, historic landmarks, and popular coastal spots. This would have a direct effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The evaluation does not adequately express the significance of this impact within the context of such a delicate landscape.

Moreover, there are concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most adverse scenarios, especially concerning important cultural heritage sites and landscapes of high value. This raises the possibility that the severity of visual impact has been understated, which compromises the reliability of the assessment.

An additional shortcoming is the neglect to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape context, linked through visual and spatial connections to the Atlantic horizon. The assessment treats these as separate entities rather than acknowledging their interrelation, leading to a partial understanding of the impacts on their cultural significance and setting.

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

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the protection of natural areas and historical assets. The magnitude of change is incompatible with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to adequately assess construction and pollution risks, which is particularly troubling given the environmental sensitivity of the West Lewis coastline. This area is known for its clean coastal waters and significant habitats, which are at risk from sediment disturbance and potential contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide comprehensive information on how these risks will be prevented, controlled, or monitored.

The proposal entails considerable seabed preparation and installation activities in a challenging Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified mitigation and contingency measures that would only be formulated after consent is granted. This deferral is concerning, as it hampers any meaningful evaluation of the adequacy and effectiveness of these measures.

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

Moreover, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs any assessment of whether sufficient safeguards will be in place to manage pollution events. This not only introduces procedural risks but also undermines the authority's capability to evaluate environmental protection measures at the time of determination.

From a regulatory viewpoint, the omission of vital environmental safeguards is in direct conflict with the stipulations of the Environmental Impact Assessment regime. Assessments of likely significant effects and required mitigations must occur prior to consent; without this information, a lawful determination cannot be achieved. The application also falls short in demonstrating compliance with policies that pertain to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, insufficient management plans, and uncertainties regarding potential impacts collectively render the assessment significantly deficient. These shortcomings inhibit a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents substantial risks to marine species, particularly due to the underwater noise generated during construction activities. High-energy hammer piling over a prolonged period is expected to cause disturbances over large distances, which could negatively affect species like dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population is a major concern, yet the application minimises the significance of these effects without providing adequate supporting evidence.

Additionally, there is a clear contradiction within the application regarding the need for licences to permit harm to European Protected Species, while also describing the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially when harm is anticipated to a level that would necessitate legal authorisation.

The assessment of fisheries and marine life is notably insufficient, lacking a robust evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry, yet the application fails to demonstrate how these habitats and uses can be protected or maintained without significant disruption.

A critical concern is the assumption that fishing activities can be displaced without any consequences. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of withstanding the additional pressure.

This omission is particularly important, as displacement could lead to overfishing in other areas and might have wider economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and local livelihoods remain poorly understood.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and fails to fully consider the impacts of what constitutes a single integrated project. The offshore turbines and onshore works are interconnected, yet they are evaluated separately, which leads to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The application includes significant onshore components, such as cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. However, the application does not provide a thorough assessment of these impacts, which prevents a comprehensive understanding of the project's overall environmental footprint.

There are serious risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application has not demonstrated that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This leads to a significant evidential gap concerning biodiversity protection.

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

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

By excluding or postponing the assessment of onshore impacts, the application fails to allow for an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered in conjunction, yet the distinct evaluation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain poorly understood.

In addition, the proposal raises alarms regarding carbon balance. The disturbance of peatland leads to the release of stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance is beneficial.

Ultimately, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism, particularly in relation to emerging sectors like astro-tourism. The introduction of permanent red aviation lighting, visible over long distances, would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application does not address 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, this absence represents a serious gap in the overall landscape and environmental evaluation. Moreover, there is no analysis of the potential 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 their sensitivity to phototaxis, which can cause disorientation and increase the risk of collisions. The lack of any lighting impact assessment or phototaxis study means that potential effects on these species remain unexamined.

This situation is further exacerbated by reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are at risk of

disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding ecological impacts, making it impossible to ascertain whether protected species or designated sites might face adverse effects. The evidential standard required to exclude these potential adverse effects cannot be met, thereby engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which emphasizes the protection of natural areas and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the ecological framework. Collectively, the absence of assessments related to dark skies and nocturnal wildlife creates a significant evidential gap, resulting in an incomplete application that cannot support a lawful determination.

TOURISM

The assessment regarding the impacts of tourism is severely lacking and does not adequately address the economic and social consequences for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which is fundamentally reliant on these attributes. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle of Lewis has experienced substantial 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. However, the application does not analyse how the industrialisation of the seascape and the decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without this crucial analysis, it remains uncertain whether the proposed development would bring a net economic benefit or jeopardise an established and thriving sector.

Moreover, the evaluation neglects to acknowledge the significance of environmental quality for tourism, particularly the value of unspoiled landscapes and dark skies in shaping visitor experiences and supporting emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, resulting in a considerable gap in understanding the impacts on a recognised and expanding segment of the local economy.

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

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

Ultimately, the inability to quantify tourism impacts, assess the environmental factors that drive visitor behaviour, and consider the island's economic dependence leads to a significant evidential gap. This inhibits a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and does not meet the requirements of sustainable development as outlined in statutory duties and national policy. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal still fails to address these concerns adequately.

There are significant gaps in the evidential basis for the proposal. It does not include comprehensive baseline data and continues to utilise an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and omits critical impact pathways, such as those related to nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, limiting the understanding of likely significant effects and residual impacts.

Procedural issues also mar the application. The lack of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts with the National Planning Framework 4 as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling has not been conducted. The assessment of the cumulative impact from both offshore and onshore elements is inadequate, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has

not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority should refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Additional Comments

As occasional visitors to Lewis we are distraught by the proliferation of windfarms on all routes leading to ferries to the islands destroying the scenery.
To destroy Lewis in the same way is deplorable and will ruin the island's tourism industry which is one of the main sources of income.

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: 2F255F81

