

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Serious concerns arise from the scale, proximity, and design of the proposal, particularly regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

Critical deficiencies are evident in the application, as it lacks an adequate evidential basis for a lawful determination. There are significant gaps in environmental data, and the available baseline information is both limited and inconsistent. Several key aspects of the proposal remain undefined, compounded by the use of a flexible design framework that hinders a clear understanding of the likely significant effects. Additionally, the reliance on unspecified mitigation measures prevents a proper assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are also clear and substantial conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal as acceptable from a policy perspective.

The unprecedented scale of the proposal introduces large turbines in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. The cumulative effect of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or trustworthy account of the potential environmental effects of the proposal. The introduction of a flexible Project Design

Envelope, lacking firm commitments to specific turbine dimensions, layouts, or configurations, generates considerable uncertainty. This uncertainty compromises the assessment's integrity and obscures the actual impacts that the development may produce, thereby preventing both the public and the competent authority from grasping the true extent of environmental effects.

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

Moreover, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where conclusions suggest negligible or non-significant effects without robust supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The application presents significant inadequacies in its assessment of alternatives, failing to satisfy the statutory requirements set forth by the Environmental Impact Assessment regime. Rather than offering a well-structured and reasoned comparison of viable alternatives based on their environmental impacts, the application provides a narrative that recounts the evolution of the project. This method does not sufficiently demonstrate that less harmful options have been appropriately identified, assessed, and preferred over more damaging solutions.

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has genuinely considered the possibility of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to the shore plays in determining impact, the failure to conduct such analysis inhibits any conclusion that the proposed siting is the least damaging option available.

These inadequacies also affect the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or mitigate impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with a lack of comparative analysis, suggests that there has been no application of mitigation by design, with an overreliance instead on post-design mitigation measures.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This constitutes a failure to adhere to the established mitigation hierarchy, preventing the competent authority from ascertaining whether less harmful and more suitable alternatives exist. In the absence of a robust alternatives assessment, it is impossible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is profoundly lacking, failing to provide a comprehensive and reliable understanding of the ecological receptors within the highly sensitive and biologically active marine environment of West Lewis. The methodologies employed are inadequate, leading to incomplete baseline data that does not effectively capture the presence, behaviour, and habitat use of various species. Consequently, this assessment does not offer a solid evidential basis for evaluating potential impacts.

One significant shortcoming pertains to otters, classified as a European Protected Species. The application does not appropriately recognise or assess their active use of coastal areas for foraging and movement. This oversight, particularly regarding their core foraging range and behavioural patterns, means that the potential impacts of

construction disturbance, noise, and increased activity remain inadequately evaluated. This lack of consideration undermines any conclusions drawn about the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks, where reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. Such an approach is likely to result in an underestimation of their presence, especially when compared to established land-based observations indicating their frequent use of these waters. The failure to adequately incorporate or consider this crucial data contributes to an incomplete baseline, further weakening the reliability of the conclusions presented.

These methodological flaws lead to conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. The insufficiency of baseline data also hinders a meaningful assessment of cumulative and indirect impacts, such as 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 fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species are inadequate. This level of uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies inhibit a thorough evaluation of impacts on marine ecology and protected species and contribute to the overall assertion that the application lacks a robust 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 development application is materially flawed, containing significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. The application has not demonstrated to the required evidential standard that these species will not be adversely affected, particularly given that the development is situated within key foraging areas and migratory pathways. The implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

There exists a fundamental contradiction within the application, as the developer concludes that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This derogation is only necessary when significant harm is expected, raising questions about the reliability of the

assessment and indicating that the conclusions are unsupported by the underlying evidence. The application fails to provide sufficient evidence that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully accounted for, and the use of modelling approaches introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. Methodologies applied are likely to underestimate mortality, especially where baseline data is incomplete and behavioural responses are not fully understood.

Moreover, the siting of turbines within a recognised migratory corridor introduces an additional risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately assess the long-term implications of sustained mortality within this corridor or the potential effects on species that have relatively small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data gaps, and limitations in modelling means that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, preventing a lawful conclusion that would support consent.

The deficiencies identified also signify a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, preventing a robust evaluation of impacts and contributing to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously flawed, neglecting the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow perspective, viewing heritage merely as a collection of disconnected, static entities instead of recognising their ongoing social, cultural, and spiritual relevance to the community.

The assessment significantly underrepresents culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which remain active sites for burial and spiritual practices. Instead of acknowledging their ongoing use and significance, the assessment inaccurately categorises them as static features, overlooking how development may impact their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural repercussions and fails to appreciate their importance in community life.

Additionally, there is a striking omission in addressing intangible cultural heritage, which encompasses the Gaelic language, traditional practices, and the long-standing bond between the community and the coastal environment. These aspects are vital to the area's identity yet are entirely absent from the evaluation, representing a major oversight. Without incorporating these factors, the development's cultural impacts cannot be adequately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as having a distinct cultural identity akin to Indigenous Peoples, has not been involved in a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and disregards established principles for participation in decisions affecting cultural and environmental matters.

A significant procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligations to assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings put the proposal in clear opposition to National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices demonstrates a clear deviation from established policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and compliance with statutory requirements results in a significant gap in evidence. The cultural impacts of the proposed development have not been thoroughly assessed, and the application lacks a sufficient foundation for determining the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding its social impacts, health, and wellbeing, with a distinct lack of transparency undermining any lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the full report has not been made available. This represents a critical evidential gap, leaving both the public and the competent authority unable to fully grasp the extent of the social risks highlighted through the developer's own investigations.

Evidence gathered suggests that local residents are already feeling stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement with the community and are therefore grounded in reality rather than speculation. The absence of the full assessment restricts thorough scrutiny of these findings and hinders the assessment of their significance in the decision-making

process.

Moreover, there are indications that the proposal is viewed as a threat to community identity and cohesion, with the developer's findings indicating potential "cultural loss." Yet, these impacts have not been sufficiently incorporated into the main application or afforded the weight they deserve. By withholding the complete Social Impact Assessment, the developer obscures 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 the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functionality could be influenced. The failure to provide the full dataset means that the application does not deliver a complete evidential basis needed to weigh benefits against harm adequately.

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

The procedural ramifications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission in the application, failing to meet the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with the evidence of existing negative impacts, leads to an incomplete and unreliable assessment. This ultimately impedes a lawful determination and reinforces the assertion that the application lacks adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the installation of large-scale turbines close to the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and a significant sense of remoteness. The introduction of such industrial structures would create a continuous presence that fundamentally changes the landscape, leading to a permanent and irreversible transformation.

The application does not sufficiently represent the extent of the visual change associated with this proposal. Given the scale and proximity of the turbines, they are likely to dominate views from residential areas, historic sites, and popular coastal locations. This situation would adversely affect visual amenity and undermine the qualities of naturalness and remoteness that define the area. The assessment fails to convey the true level of impact or its significance within this sensitive landscape.

Concerns also arise from the methodology used to select and present visual viewpoints. There is evidence suggesting that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This shortcoming raises the risk that the visual impact has been underestimated, which calls into question the reliability of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context, linked visually and spatially to the Atlantic horizon. The evaluation treats these sites as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 in terms of protecting natural places and historic assets. The extent of the proposed change is incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a robust worst-case assessment undermines any claims of compliance with policy requirements.

Moreover, it is evident that the impacts identified cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Consequently, the resulting changes would be fundamental and permanent, rather than something that could 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 interrelated 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 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 waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, both of which are inadequately addressed in the application. The assessment of fisheries and marine life fails to provide a comprehensive evaluation of the ecological and socio-economic impacts associated with the proposal. It does not sufficiently demonstrate that these vital uses and habitats can be safeguarded from significant disruption.

A crucial flaw lies in the assumption that fishing activities can be displaced without any adverse consequences. The lack of evidence supporting the availability or accessibility of alternative fishing grounds capable of accommodating additional pressure is a

serious oversight. This gap in the assessment is particularly concerning, as displacing fishing activity risks overfishing in other areas, potentially leading to broader economic ramifications for the local fleet. Without a detailed and evidence-based analysis, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, primarily due to the underwater noise generated during construction. The prolonged use of high-energy hammer piling is likely to create disturbances over considerable distances, impacting species such as dolphins. The application underestimates the predicted disturbances affecting a significant portion of the local bottlenose dolphin population, which raises alarming concerns, particularly as it lacks sufficient supporting evidence to justify this downplaying of potential impacts.

There is an evident inconsistency in the application, where the necessity for licences to permit harm to European Protected Species is recognised, yet the impacts are simultaneously characterised as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially in light of anticipated harm that may require legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts resulting from a range of pressures, including habitat disturbance, noise, 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 perspective, the application fails to demonstrate compliance with the 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, hindering any assertion that the proposal aligns with sustainable development principles.

In summary, the deficiencies highlighted, including the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions, lead to an incomplete and unreliable assessment. These shortcomings preclude a thorough evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents serious deficiencies in the assessment of onshore infrastructure, which is materially incomplete and fails to encompass the full extent of impacts associated with what constitutes a single integrated project. The interconnection between offshore turbines and onshore works has been overlooked, leading to a fragmented analysis that obscures the true scale of the environmental and socio-economic consequences.

Onshore elements, including cabling through protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure, traverse sensitive

landscapes. Significant excavation across deep peat areas, particularly within Barvas Moor, poses threats to this vital carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which inhibits a complete understanding of the project's overall environmental footprint.

Moreover, the exclusion or deferral of onshore impact assessments compromises the ability to evaluate cumulative effects accurately. According to the Environmental Impact Assessment process, it is essential that all project components are reviewed collectively. The current approach, which separates offshore and onshore elements, fails to capture the combined impacts on peatlands, habitats, and surrounding communities.

Sensitive habitats, such as machair systems and peatland environments, face considerable risks that are meant to be protected under policy. The application has not demonstrated a full assessment of impacts on these habitats or provided sufficient avoidance measures, resulting in a clear evidential gap concerning biodiversity protection.

There are also significant concerns regarding carbon balance. The disruption of peatland could release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this matter, failing to confirm that the overall carbon balance remains favourable.

Furthermore, routing infrastructure through active croft land introduces conflicts with established land use and legal rights. The application does not offer evidence that the necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

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

In summary, the separation of project components, 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, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant shortcoming. The proposed development along the West Lewis coastline introduces permanent red aviation lighting, which is visible over extensive distances and creates a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally impacts the night-time environment, which is characterised by exceptionally dark skies

that contribute to the area's environmental quality, cultural identity, and tourism value.

Moreover, the application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the critical role of dark skies in the region's identity and the emerging sector of astro-tourism, this oversight is particularly concerning. The absence of such assessments indicates a notable gap in the overall evaluation of landscape and environmental impacts.

Importantly, there is no consideration of how artificial lighting affects nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit high sensitivity to artificial lighting due to phototaxis, which may cause disorientation and elevate collision risks. The application does not include a lighting impact assessment or a phototaxis study, thereby neglecting potential effects on these species and their mortality rates.

This omission is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to reflect nocturnal activities and associated hazards. Additionally, species like Kittiwakes, known to forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this potential threat has not been evaluated. The lack of site-specific night-time data creates a critical deficit in understanding the ecological impacts.

Without a thorough assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would experience adverse impacts. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, the omission stands in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the overall assessment of landscape and seascape impacts, given that night-time character is an essential component of the environment.

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

TOURISM

The proposed development brings serious concerns regarding its impacts on tourism, a vital component of the Isle of Lewis economy. With tourism being fundamentally reliant on the area's wild coastline, near-pristine landscape, dark skies, and the overall sense of remoteness, any industrialisation of the seascape may jeopardise this crucial sector. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide any quantified analysis regarding how large-scale offshore

infrastructure would influence visitor numbers, behaviour, or the economic contribution of tourism.

Tourism has seen significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application lacks a model that considers how potential degradation of environmental quality may impact Tourism Gross Value Added and the broader economic resilience of the community. Without this essential analysis, it remains unclear if the development would create a net economic benefit or threaten an established and flourishing sector.

Furthermore, the assessment neglects the critical role of environmental quality in sustaining tourism, such as the need for unspoiled landscapes and dark skies, which enhance the visitor experience and cater to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this issue, leaving a substantial void in understanding how the proposal could affect this recognised and growing segment of the local economy.

In a context where economic diversification is limited for this island community, the lack of a thorough assessment of tourism impacts raises significant concerns regarding employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, contrary to the requirements of 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 obligation to prove net benefit. Additionally, it contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to evaluate the economic implications of the proposal.

Collectively, the inadequacies in quantifying tourism impacts, assessing environmental factors influencing visitor behaviour, and recognising the island's economic dependencies result 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 Spiorad na Mara Offshore Wind Farm proposal does not meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application revisits issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. The current proposal is presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for determination within the application. It lacks complete baseline data, employs an undefined design envelope, relies on unspecified mitigation measures, and omits crucial impact pathways concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of likely significant effects or residual impacts.

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

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, coupled with internal inconsistencies, have not met the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, preventing a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or invokes 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.

Additional Comments

Wind turbines and their associated infrastructure are causing incredible devastation across the UK (and the world tbh). The environmental damage being caused is not being

properly assessed and accounted for. They are destroying vital peat bog areas, dark sky areas, marine life, underground life, birds, mammals, humans! We can't go on with these intrusive monstrosities littering our once beautiful island. There are plenty of more efficient and less damaging alternatives to renewable energy which need to be considered moving forward. 200+m eyesores are not the answer. Please stop with this madness before it's all too late!

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: 8F9BAD05

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Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural identity. The proposal's scale, design, and proximity to the shoreline raise critical concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal remain undefined. The employment of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are not underpinned by robust evidence.

There are notable and substantial conflicts with existing policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts are directly related to the statutory tests necessary for consent, thereby undermining the competent authority's ability to conclude that the development meets acceptable policy standards.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual impact, and environmental repercussions. With large turbines situated close to the shoreline, the application's deficiencies—including insufficient information, reliance on undefined mitigation strategies, and evident policy non-compliance—render it incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to deliver a clear, transparent, and dependable account of the potential environmental impacts of the proposal. The proposal's use of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates significant uncertainty. This ambiguity hinders the ability to apply a worst-case scenario consistently and jeopardises the integrity of the assessment. Consequently, the impacts outlined may not accurately represent what will ultimately be constructed, preventing both the public and the relevant authorities from fully understanding the extent of the environmental effects.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed after approval restricts any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This deferment of crucial information to post-consent stages is procedurally unacceptable and contradicts the intentions of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies should be clearly established prior to any determination.

There are notable evidential shortcomings, including insufficient baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of the impacts, particularly in cases where the report concludes negligible or non-significant effects without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, thereby introducing a level of scientific uncertainty that conflicts with statutory obligations.

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 situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it remains unclear whether the impacts have been thoroughly assessed or if appropriate safeguards exist.

In summary, the combination of an undefined design envelope, lack of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot make a well-informed decision based on the information available.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is severely lacking and does not adhere to the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their

environmental effects, the application presents a narrative of project development. This method fails to show that less harmful options have been thoroughly identified, evaluated, and chosen over more damaging alternatives.

There is a distinct absence of transparent or evidence-based comparisons regarding alternative offshore sites, development sizes, or design options. Notably, the application does not show that the developer has genuinely explored the possibility of positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in determining impact, the lack of such an analysis means that it cannot be concluded that the proposed siting is the least damaging choice available.

These shortcomings extend to the evaluation of cable routing and landfall, where there is inadequate evidence that alternative routes have been properly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis indicate that mitigation by design has not been applied, relying instead on mitigation measures that come after the design phase.

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

From a policy standpoint, this inadequacy jeopardises compliance with National Planning Framework 4, particularly in the context of safeguarding natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that adds to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, failing to provide a complete and reliable understanding of the ecological receptors in this sensitive and biologically active area. Inadequate baseline data and poor methodologies result in an inability to accurately capture species presence, behaviour, and habitat use, leading to a lack of evidential support for evaluating potential impacts.

Among the critical shortcomings is the omission of otters, which are a European Protected Species. The application neglects to properly identify and assess their active use of coastal zones for foraging and movement. This oversight means that the

assessment does not consider their core foraging range and behavioural patterns, resulting in an inadequate evaluation of the potential effects of construction disturbance, noise, and increased activity on this species. Consequently, the conclusions drawn regarding the absence of significant effects are undermined.

Moreover, the assessment of basking sharks suffers from serious deficiencies as it relies on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence when compared to established land-based observations that indicate frequent use of the waters. The failure to consider such data adequately leads to an incomplete baseline and further weakens the reliability of the presented conclusions.

These methodological shortcomings result in assertions of negligible or non-significant effects being based on unsubstantiated assumptions rather than solid evidence. The lack of sufficient baseline data also hinders meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions, creating uncertainty about the actual risks 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 the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These issues obstruct a thorough evaluation of impacts on marine ecology and protected species, contributing 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 substantial gaps in evidence and internal contradictions that fundamentally undermine its conclusions. It is crucial to highlight that the west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. The application fails to provide adequate evidence to the required standard that these species will not face adverse effects. The proposed site lies within vital foraging areas and migratory pathways, yet the implications of habitat loss, collision risk, and displacement have not been thoroughly evaluated.

The application presents a glaring contradiction; it states there are no significant adverse effects while simultaneously making a case for derogation under the Habitats Regulations, which is typically only invoked when significant harm is anticipated. This inconsistency raises serious doubts regarding the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, there is insufficient evidence to demonstrate that seabirds linked to

protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds has not been adequately recognised, and reliance on modelling techniques introduces a level of uncertainty, particularly concerning species like Kittiwakes and Fulmars that are already in severe decline. The methodologies used likely underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

Placing turbines within a recognised migratory corridor adds another layer of significant risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment fails to sufficiently consider the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

Regulatory scrutiny reveals that the application does not fulfil the evidential threshold necessary to ascertain no adverse effect on the integrity of protected sites. The combination of conflicting conclusions, alongside data deficiencies and limitations in modelling, indicates that the standard of evidence beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, which impedes reaching a lawful conclusion supportive of consent. Moreover, the identified deficiencies demonstrate a failure to comply with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected directly contravenes national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Development

proposals must foster positive health outcomes and mitigate harm. The available evidence, which points to existing adverse effects, has not been fully disclosed, thereby preventing a demonstration of compliance with relevant policy.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline poses an immediate risk of creating a continuous industrial presence that would fundamentally alter this character. This transformation of the landscape would be permanent and irreversible.

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

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not fully capture the most sensitive receptors or worst-case scenarios, especially regarding key 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.

Additionally, the application overlooks the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. Treating these as isolated assets neglects their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these important relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This impact transcends visual implications, introducing broader cultural and spatial harm that has not been sufficiently assessed within the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The current assessment of construction and pollution risks is inadequate, lacking the necessary detail for a proper evaluation of environmental effects. The proposal entails significant seabed preparation and installation activities within a dynamic Atlantic environment. However, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated after consent, which prevents any meaningful assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures is especially alarming due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disruption and pollution. While the application recognises the risks of sediment mobilisation and potential chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies.

Moreover, there is ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. In the absence of thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning to a stage following consent, the application obstructs the evaluation of whether appropriate safeguards exist to address pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures during the determination process.

From a regulatory viewpoint, the postponement of essential 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. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the deficiencies related to the absence of defined mitigation measures, lack of detailed management plans, and uncertainty regarding potential impacts lead to a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks and further confirm 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, yet the application does not adequately evaluate the ecological or socio-economic impacts of the proposal. A critical concern lies in the assumption that fishing activity can be displaced without consequences, with no evidence provided to support the availability or accessibility of alternative fishing grounds capable of sustaining additional pressure. This lack of information is significant, as it poses risks of overfishing elsewhere and could have wider economic repercussions for the local fishing fleet. Without a well-supported assessment, the impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal carries considerable risks for marine species, notably due to the underwater noise resulting from construction activities. The extended use of high-energy hammer piling is expected to cause disturbances over large distances, affecting species such as dolphins. The potential impact on a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

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

Additionally, the assessment neglects to account for 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 determine 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 show that the development can coexist with existing marine users or avoid unacceptable impacts on

marine biodiversity, thereby failing to establish that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is lacking and does not fully address the impacts of this integrated project. The offshore turbines and onshore works are interconnected; however, they are being evaluated separately. This fragmented approach makes it difficult to grasp the full extent of environmental and socio-economic effects.

Onshore activities include the installation of cabling through protected moorland, the construction of a substation close to Stornoway, and the creation of access routes through sensitive landscapes. These actions involve excavation in deep peat areas, particularly within Barvas Moor, which serves as a significant carbon store and is ecologically important. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's environmental footprint.

By not addressing 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 collectively, yet the division between offshore and onshore components means the overall effects on peatlands, habitats, and communities remain unclear.

There are considerable risks to delicate habitats, including machair systems and peatland environments, which benefit from policy protection. The application does not confirm that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures are in place. This results in a clear gap in evidence concerning biodiversity protection.

The proposal raises important issues about carbon balance as well. Disturbing peatland releases stored carbon, which could lead to a carbon debt, contrary to the goals of renewable energy initiatives. This issue is not adequately addressed in the application, which fails to show that the overall carbon balance remains positive.

Moreover, routing infrastructure through active croft land presents potential conflicts with existing land uses and legal rights. The application does not provide proof that the necessary consents or processes have been started, which raises doubts about its feasibility and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and ensure the protection of peatlands, habitats, and land use interests is inconsistent with the

National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

In summary, the division of project components, lack of thorough assessment, and insufficient evidence regarding environmental and land use impacts make this aspect of the application incomplete and unreliable, which obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that would create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment. This change is concerning, particularly given the West Lewis coastline's exceptionally dark skies, which play a crucial role in the area's environmental quality, cultural identity, and tourism potential.

The Environmental Impact Assessment is significantly lacking, as it does not evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly alarming considering the growing importance of dark skies for emerging tourism sectors such as astro-tourism. Such omissions result in clear gaps in the overall landscape and environmental evaluation.

Moreover, there is no examination of how these lighting changes may impact nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can lead to disorientation and a heightened risk of collision. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including the risk of increased mortality, have not been considered.

This critical omission is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. Kittiwakes, for example, may forage or migrate at night and are similarly vulnerable to disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

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

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the broader evaluation of landscape and seascape impacts, as night-time character is an essential aspect of the environment.

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

TOURISM

The application fails to adequately assess the tourism impacts, which are crucial for the economy of the Isle of Lewis. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has experienced significant growth, escalating from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the assessment neglects to model the potential impacts of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added and the wider economic resilience. Without this analysis, it remains unclear if the proposed development would provide a net economic benefit or detract from a sector that is already established and flourishing.

Additionally, the application does not adequately consider the role of environmental quality in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences. This is especially important for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in understanding the potential impacts on a recognised and expanding sector of the local economy.

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

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

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and considering the island's economic dependency result in a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm reflects a significant failure to meet the criteria of sustainable development when evaluated against statutory duties, national policy, and evidential requirements. It mirrors the critical issues associated with the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new proposal is presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Fundamental to the assessment process is the lack of a comprehensive and reliable evidential foundation. The application reveals notable deficiencies in baseline data and continues to rely on an undefined design envelope. Moreover, it depends on mitigation measures that remain unspecified and fails to account for significant impact pathways, such as those related to nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, obstructing a thorough understanding of probable significant effects or residual impacts.

There are also evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment represents a violation of statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment constitutes a significant omission. These deficiencies impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal conflicts directly with National Planning Framework 4. It fails to demonstrate adequate protection of biodiversity, natural spaces, and cultural heritage, does not substantiate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, thereby obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

The environmental risks remain uncertain and could potentially be significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential standard necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, precludes a lawful, evidence-based decision. The competent authority is urged either to deny consent on these grounds or to invoke the appropriate regulatory measures to obtain the missing information.

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

Additional Comments

Has anyone done a survey on sea mine from era World War 2 ,as mines have washed up on Ballintrushal /shader shore in the past ,lots of ordinance was dumped off the coast after the war..also Clach an trushal is largest monolith in Scotland and the view would be ruined by turbines

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: BFCD0043

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 objection is informed by an examination of the Environmental Impact Assessment Report and its associated documents, revealing material deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale and design of the proposal, along with its proximity to the shoreline, raise significant concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent. Furthermore, essential components of the proposal remain undefined. The adoption of a flexible design framework hampers a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a comprehensive or informed understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust support.

Substantial conflicts with established policy are evident. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not convincingly demonstrate that it can meet national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are fundamental to the statutory tests for consent and hinder the competent authority's capacity to deem the development acceptable within the policy framework.

The unprecedented scale of the proposal in this area, with large turbines located in close proximity to the shoreline, raises serious concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the shortcomings of insufficient 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. Under these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents numerous deficiencies that undermine its reliability and completeness, preventing a lawful assessment of the environmental effects associated with the proposal. A significant issue arises from the use of a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and inhibits a consistent application of a worst-case scenario, ultimately failing to provide both the public and the competent authority with a clear understanding of the potential environmental effects that may arise from the development.

Additionally, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. By seeking consent on the premise that environmental harm will be addressed later, it obstructs any meaningful evaluation of effectiveness and assessment of residual impacts. This deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures must be clearly established prior to determination.

Moreover, the report suffers from significant evidential deficiencies. There are notable gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. Consequently, the absence of comprehensive information hampers the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to align with statutory requirements.

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

In summary, the deficiencies stemming from an undefined design envelope, lack of specified mitigation, and inadequacies in baseline data lead to an unreliable Environmental Impact Assessment Report. These shortcomings prevent a robust and lawful assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to an inadequate assessment of alternatives. Rather than offering a structured comparison of viable alternatives based on environmental impacts, it provides a narrative detailing the project's evolution. This method does not

sufficiently demonstrate that less harmful options have been identified, evaluated, and chosen over more damaging ones.

There is a lack of transparent and evidence-based analysis regarding alternative offshore locations, scales of development, or design configurations. Specifically, the application does not indicate that the developer has meaningfully considered the potential of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts could be lessened. Given the sensitivity of the West Lewis coastline, the crucial importance of proximity to shore in assessing impacts makes this absence of analysis particularly significant and obstructs any conclusion that the proposed siting is the least damaging available option.

These shortcomings also extend to the assessment of cable routing and landfall, as there is insufficient evidence demonstrating that alternative routes have been adequately explored to minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been employed, with an overreliance on post-design mitigation measures instead.

Consequently, the application does not show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal is a sustainable or compliant solution according to policy standards.

From a policy viewpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a material omission, contributing to the overall conclusion that the application has not been adequately evaluated and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species lacks completeness and reliability in understanding the ecological receptors within the West Lewis coastal environment. This area is known for its biological activity and sensitivity; however, the baseline data provided is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to offer a strong evidential basis for evaluating potential impacts.

A significant oversight involves otters, classified as a European Protected Species, as the application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. The lack of attention to their core foraging

range and behavioural patterns means that the potential impacts of construction-related disturbances, noise, and increased activity have not been sufficiently evaluated. This shortcoming undermines any assertions regarding the absence of significant effects on this species.

There are further deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, particularly when compared with established land-based observations that suggest frequent usage of these waters. The failure to adequately incorporate or consider such data contributes to an incomplete baseline and diminishes 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 solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty surrounding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

In summary, the combination of 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 contribute to the conclusion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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. Many of these populations are already in decline, yet the application does not adequately demonstrate that these species will not be adversely affected. The ornithological assessment is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to robustly evaluate the implications of displacement, collision risk, or habitat loss, particularly for species such as Kittiwakes and Fulmars, which are in severe decline.

A critical contradiction arises within the application, as the developer concludes that there are no significant adverse effects while also advancing a Habitats Regulations derogation case, a process only necessary when significant harm is anticipated. This inconsistency raises serious questions regarding the reliability of the assessment and

suggests that the conclusions drawn are not supported by the evidence provided. The methodologies employed are likely to underestimate mortality, especially given that baseline data is incomplete and the behavioural responses of the species in question are not fully understood.

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

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there would be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and limitations in modelling means that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle, preventing a lawful conclusion in favour of consent.

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

Overall, the assessment's reliability is compromised due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings inhibit a robust evaluation of the potential impacts and lead to the conclusion that the application does not meet the statutory requirements necessary for a proper determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The application suffers from a significant lack of transparency regarding social impacts, health, and wellbeing, which undermines its validity. The developer has conducted a Social Impact Assessment that involved focus groups with local residents, but the complete report remains unpublished. This failure to disclose the full assessment creates a notable evidential gap, hindering both public understanding and the competent authority's ability to assess the identified social risks thoroughly.

Residents are already reporting measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts have been gathered through direct engagement and should not be dismissed as speculative. Nonetheless, the absence of the full assessment limits scrutiny of the findings, thereby affecting their significance in the decision-making process.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with the developer's own research highlighting the risk of "cultural loss." Despite this alarming insight, such impacts have not been adequately reflected in the main

application, nor have they been afforded the weight they merit. By withholding the complete Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of openness further compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this nature, especially when they may affect community character and functioning. The failure to provide the entire dataset leaves the application lacking a comprehensive 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. It is essential for developments to foster positive health outcomes and avoid detrimental effects, yet the evidence presented indicates existing adverse impacts that remain unaddressed. Without access to the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications are noteworthy. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This omission represents a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of adverse effects already being felt by the community, leaves the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The 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 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.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

Moreover, there is no analysis of the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to such lighting, which can lead to disorientation and an increased risk of collision. The application does not include any impact assessment

regarding this lighting or a phototaxis study, thus failing to evaluate the potential effects on these species or the risk of increased mortality.

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

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

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

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

TOURISM

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

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

Furthermore, the assessment disregards the significance of environmental quality in

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development, as evaluated against statutory duties, national policy, and evidential standards. The application mirrors the core 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 being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are significant deficiencies in the evidential basis provided for the determination of the application. The baseline data is incomplete, and there remains an undefined design envelope. It relies on unspecified mitigation measures and omits crucial impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to facilitate a full understanding of the likely significant effects or residual impacts.

Additionally, procedural errors are apparent. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to provide the complete Social Impact Assessment constitutes a material omission, hindering the competent authority's

ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unfit for determination.

The proposal stands in direct opposition to National Planning Framework 4, failing to ensure the protection of 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, primarily 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.

Uncertainty surrounds environmental risks, which may be significant. Assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The required evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

The proposal would also lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual connections, and adverse effects on tourism will yield permanent impacts that cannot be mitigated satisfactorily.

In summary, the application is both procedurally and substantively unfit for determination. The multitude of informational deficiencies, alongside conflicts with policy and unresolved environmental risks, inhibits a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or implement relevant regulatory provisions to necessitate 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: F7AE2D94

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents has revealed 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 heritage. The design, scale, and proximity of the proposal raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a lawful decision. There are critical gaps in environmental data, with baseline information being both limited and inconsistent. Additionally, many essential elements of the proposal remain undefined. The adoption of a flexible design framework hampers a clear assessment of likely significant impacts, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the provided documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidential support.

There are also evident and significant policy contradictions. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regulations, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not establish that it can meet national obligations to safeguard biodiversity, climate concerns, and environmental integrity. These discrepancies directly relate to the statutory requirements for consent and compromise the capability of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal involves large turbines located in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policies indicate that the application is incomplete and incapable of supporting a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

There are significant gaps in evidence, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of comprehensive information leads to an unclear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not meet the evidential threshold established under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it is evident that impacts have not been fully assessed nor have appropriate safeguards been established.

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

ASSESSMENT OF ALTERNATIVES

The Environmental Impact Assessment regime stipulates clear statutory requirements regarding the assessment of alternatives, which the current application fails to satisfy. The submission lacks a structured and reasoned evaluation of realistic alternatives, focusing instead on a narrative regarding the project's evolution. This methodology

does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more detrimental solutions.

Furthermore, the application presents no transparent or evidence-based comparison of alternative offshore sites, varying development scales, or design configurations. Notably, there is no indication that the developer has seriously contemplated positioning turbines further offshore, an approach that would likely lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact, the lack of such analysis obstructs any determination that the proposed siting constitutes the least harmful option.

The shortcomings are apparent in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear avoidance strategy or perform comparative analyses reveals that mitigation by design has not been implemented, resulting in a reliance on post-design mitigation measures.

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

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative evaluation constitutes a significant omission, leading to the overall conclusion that the application has not undergone sufficient assessment and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

There is a significant oversight concerning otters, which are classified as a European Protected Species. The application neglects to properly recognise and assess their active use of coastal regions for foraging and movement. The failure to consider their

core foraging range and behaviour means that the potential impacts of construction-related disturbances, noise, and increased activity have not been sufficiently evaluated. This gap undermines any conclusions about the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application raises significant concerns regarding its compliance with established evidential standards, particularly in relation to the integrity of protected sites. The ornithological assessment reveals internal inconsistencies and substantial gaps in evidence that critically undermine its conclusions. Despite the west coast of the Isle of Lewis hosting internationally important seabird populations, which are already experiencing declines, the application fails to adequately demonstrate that these species will not face adverse impacts. It is particularly troubling that the development is situated within vital foraging areas and migratory pathways, yet the assessment does not thoroughly evaluate the potential risks associated with displacement, collision, or habitat loss.

A serious contradiction arises within the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously making a case for Habitats Regulations derogation—a process only applicable when significant harm is

anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that the conclusions presented lack robust support from the evidence provided. Furthermore, there is insufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment neglects to fully account for the importance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies employed appear likely to underestimate mortality rates, especially in instances where baseline data is lacking and species behavioural responses are not fully understood.

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

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

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

Overall, the unreliability of the assessment stems from its internal contradictions, methodological shortcomings, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and culminate in the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely deficient, neglecting to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow perspective, treating heritage as isolated and unchanging assets, rather than acknowledging their continuing social, cultural, and spiritual relevance within the community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, yet the assessment mistakenly categorises them as static features, failing to take into account their ongoing use, significance, and the

implications of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and disregards the cemeteries' integral role in community life.

Moreover, the assessment lacks a consideration of intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These components are crucial to the area's identity but are entirely omitted from the evaluation, representing a significant oversight. The absence of these factors hinders a proper understanding of the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity with characteristics recognised as those of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the credibility of the assessment and fails to comply with established principles regarding participation in decisions that affect cultural and environmental interests.

A fundamental procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission is sufficient to preclude a lawful determination.

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

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential void. The cultural impacts of the development have not been adequately evaluated, and the application lacks a robust foundation for ascertaining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of health, wellbeing, and social impacts related to the proposal is significantly lacking, with transparency essential for a lawful evaluation being absent. Although the developer commissioned a Social Impact Assessment that included focus groups involving local residents, the full report remains unpublished. This creates a critical evidential gap, limiting both public understanding and the competent authority's capacity to grasp the full extent of social risks identified by the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to

the scale and proximity of the proposed development. These impacts stem from direct engagement and are therefore grounded in reality, not speculation. However, the failure to disclose the complete assessment restricts adequate scrutiny of these findings, thereby hampering the ability to assess their significance during the decision-making process.

Moreover, there is indication that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been properly integrated into the main application or afforded the necessary importance. The withholding of the entire Social Impact Assessment obscures the genuine human and social costs of the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning are at stake. By not providing the complete dataset, the application fails to establish a full evidential basis for weighing the balance of benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is imperative that developments promote positive health outcomes and avert harm. Nonetheless, the evidence available points to existing adverse effects that remain inadequately disclosed. Without the full assessment, it is impossible to confirm adherence to this policy.

The procedural implications of this situation are profound. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a critical omission within the application and a failure to meet the evidential standards set by the Environmental Impact Assessment framework.

In conclusion, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing negative impacts, renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly inadequate and does not sufficiently account for the scale of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines in proximity to the shore would establish a continuous and prominent industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

Furthermore, the application fails to represent the full extent of the anticipated visual

changes. Given the scale and proximity of the turbines, they would dominate views from residential properties, historical sites, and frequently visited coastal locations. This dominance would directly impact visual amenity and diminish the qualities of naturalness and remoteness that currently define the area. The assessment does not adequately communicate the level of impact or its significance within the context of such a sensitive landscape.

There are also significant methodological issues regarding the selection and depiction of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This inadequacy poses a risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Additionally, a critical shortcoming is the failure to evaluate the interconnected relationship among landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to a broader landscape context, visually and spatially connected to the Atlantic horizon. The assessment treats these significant assets in isolation, disregarding 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 the context in which heritage assets are perceived and affecting their relationship with the natural horizon. This represents not only a visual impact but also a wider cultural and spatial detriment that has not been sufficiently addressed within the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 concerning the protection of natural environments and historical assets. The extent of change is incompatible with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a thorough worst-case assessment further challenges any assertion of policy conformity.

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. Thus, the resulting change is fundamentally significant and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment inadequately represents the scale of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and affirm the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant risks to the sensitive West Lewis coastline, which is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. The assessment of construction and pollution risks is notably incomplete, lacking the necessary detail to evaluate potential environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead depending on mitigation and contingency measures that are to be prepared after consent has been granted. This reliance on undefined future measures raises considerable concerns, especially given the delicate nature of the receiving environment.

The application acknowledges various risks, including sediment mobilisation and the potential for accidental chemical or oil spills. However, it fails to provide adequate information on the strategies that will be implemented to prevent, control, or monitor these risks. Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may arise 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 such disturbances, which could adversely affect marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures only exacerbates these issues. By postponing contingency planning to a post-consent phase, the proposal undermines the ability to assess whether appropriate safeguards are in place for responding to pollution events. This creates procedural risks and hinders the competent authority's capacity to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation need to be thoroughly assessed prior to consent; when such information is absent, a lawful determination cannot be reached. Additionally, the application does not demonstrate compliance with the policy requirements regarding environmental protection and water quality.

In summary, the combination of undefined mitigation measures, a lack of detailed management plans, and uncertainty about potential impacts results in an assessment that is materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

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

A major concern is the assumption that fishing activity can be displaced without repercussions. The application lacks evidence to support claims that alternative fishing grounds are available, accessible, or capable of accommodating increased pressure. This gap is crucial, as such displacement could lead to overfishing in other areas, potentially resulting in broader economic consequences for the local fishing fleet. The absence of a clear, evidence-based assessment means the effects on fisheries and local livelihoods remain inadequately understood.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The extensive use of high-energy hammer piling is expected to cause disturbances across considerable distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns, yet the application diminishes the importance of these effects, lacking sufficient supporting evidence.

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

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

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

Collectively, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and untrustworthy. These shortcomings hinder a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project includes offshore turbines and various onshore works, which are part of a single integrated initiative. However, the assessment of these onshore infrastructure components is incomplete and does not account for the full impacts of the project. The offshore and onshore elements are intrinsically linked but are examined separately, leading to a fragmented understanding of the environmental and

socio-economic effects.

Onshore works involve cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure through sensitive landscapes. These activities require excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, which obscures the project's overall environmental footprint.

By not addressing or delaying the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components should be considered collectively. However, the separation of the offshore and onshore parts means that the combined impacts on peatlands, habitats, and communities remain poorly understood.

There are notable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not adequately show that the impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been put in place, creating a significant gap in biodiversity protection evidence.

Additionally, there are concerns about the carbon balance. Disturbing peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this concern or demonstrate that the overall carbon balance is favourable.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, raising concerns about deliverability and legal compliance.

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

Overall, the separation of project elements, the lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts make this part of the application incomplete and unreliable, which impedes a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The proposed development introduces permanent red aviation lighting that would create an intrusive "wall of light" visible over long distances, fundamentally changing the night-time environment.

There is no assessment of how this lighting impacts visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning considering the significance of dark skies for the area's identity and for emerging sectors such as astro-tourism. The absence of these evaluations represents a serious gap in the landscape and environmental assessment.

Moreover, the application fails to evaluate the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to such lighting, which can cause disorientation and increase the risk of collisions. The lack of a lighting impact assessment or phototaxis study means that the potential effects on these species and their mortality rates are not considered.

This deficiency is worsened by the use of daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and related risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting. However, this risk has not been evaluated, and the absence of site-specific night-time data leaves a critical gap in understanding ecological impacts.

Without assessing nocturnal effects, it is impossible to determine if protected species or designated sites would suffer adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which emphasises the protection of natural places and environmental quality. Additionally, it undermines the overall assessment of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

In summary, the lack of assessment regarding dark skies and nocturnal wildlife leads to 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 economic importance of tourism to the Isle of Lewis cannot be overstated, as it has grown significantly 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. The application in question, however, inadequately assesses the potential tourism impacts, failing to evaluate the economic and social consequences for this vital sector. While it acknowledges that 86% of visitors are attracted by the area's scenery, there is a notable absence of a quantified analysis regarding how large-scale offshore infrastructure may influence visitor numbers, behaviour, or overall economic contribution.

Moreover, the assessment neglects the critical relationship between environmental

quality and tourism. Unspoiled landscapes, dark skies, and a sense of remoteness are essential components of the visitor experience, especially in emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, leaving a substantial gap in understanding the impacts on this recognised sector of the local economy. Additionally, the failure to model how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added and overall economic resilience remains unaddressed.

In the context of a community with limited economic diversification, the shortcomings of the tourism impact assessment raise broader concerns regarding employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment further indicates that the economic vulnerabilities associated with this development have not been evaluated as mandated under the Islands (Scotland) Act 2018. This lack of assessment is particularly concerning given that the application does not demonstrate compliance with National Planning Framework 4, specifically regarding economic impact and the necessity to establish net benefit.

When considered collectively, the failures to quantify tourism impacts, evaluate environmental factors that drive visitor behaviour, and acknowledge the island's economic dependencies create a significant evidential gap. This undermines the ability to conduct a thorough evaluation of the economic effects, leading to the conclusion that the application is fundamentally incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as outlined in statutory duties, national policy, and evidential standards. The proposal raises the same core issues that resulted in the refusal of the Lewis Wind Power application in 2008, where the level of industrialisation was deemed unacceptable. Presenting this application under a strengthened policy framework, which places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, does not address the fundamental shortcomings.

Critical gaps in baseline data hinder a complete and reliable evidential basis for assessment. The proposal continues to rely on an undefined design envelope and on unspecified mitigation measures, while omitting important impact pathways such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

There are evident procedural failures within the application. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to disclose a full Social Impact Assessment represents a material omission. These inadequacies prevent the

competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. There is no evidence presented that health and wellbeing impacts are acceptable, nor is there any modelling of tourism impacts to support claims of net economic benefit. The assessment of cumulative impacts from offshore and onshore elements is insufficient, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold required to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

Moreover, the proposal is poised to cause substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and negative implications for tourism are all permanent effects that cannot be mitigated to an acceptable level.

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

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

Additional Comments

I have visited Lewis on many occasions over the years and I am horrified by the development proposed. Lewis is an island of extreme beauty and wildness, unique and special because of its remoteness and surrounding seascape - development on this industrial scale will destroy that.

This proposal is driven by greed alone. Costly, intermittent and in no way green, clean or free - wind farms will not give us energy security or carbon free energy - the opposite is true. Every aspect of turbine manufacture is dirty- from mining for rare earths often using child labour as in the Congo to polluting water supplies in Mongolia, smelting in China using coal, transporting halfway across the world using diesel to the very real human cost of adverse health effects from infrasound. The damage to land and sea creatures is immense and unsustainable cumulatively as more and more infrastructure is added to the environment. The rush to renewables with no plan or thought for the

consequences is driving more families into fuel and food poverty - this is immoral. It is a basic human right to have access to food and warmth and this is being denied to millions through the pursuit of fanatical policies. Please protect the environment that is under your care and refuse this development for the sake of our communities, wildlife and habitats and to preserve all that is special about Lewis for the future. Thank you.

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: 0DED129C

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, which reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is sited off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively unspoilt environment, and rich cultural heritage. The size, proximity, and design of the proposed wind farm raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. There are gaps in critical environmental data, and baseline information is both limited and inconsistent. Furthermore, vital components of the proposal remain unclear. The flexible design framework used obscures the understanding of potential significant effects, while the proposed mitigation measures, which have yet to be clearly defined, render an assessment of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims regarding negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are apparent and substantial. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not show that it can meet national obligations to protect biodiversity, climate interests, and environmental integrity. Such discrepancies are directly related to the statutory tests for consent and compromise the competent authority's capacity to deem the development acceptable from a policy standpoint.

The scale of the wind farm is unprecedented in this area, with large turbines situated close to the shoreline, raising critical concerns about landscape capacity, visual dominance, and environmental effects. The combination of insufficient information, reliance on vague mitigation strategies, evidential shortcomings, and clear breaches of policy demonstrates 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 unreliable and incomplete, failing to provide a full, transparent, or reliable account of the likely environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty and hinders a consistent application of a worst-case scenario. This compromises the integrity of the assessment, preventing both the public and the competent authority from comprehending the true extent of environmental impacts.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that remain undefined. This deferral means that environmental harm is expected to be addressed post-consent, inhibiting any meaningful evaluation of effectiveness or assessment of residual impacts. Such a process is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to determination.

Significant evidential deficiencies also exist, including gaps in baseline data, limitations in methodology, and reliance on assumptions instead of site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the combination of an undefined design envelope, absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report fundamentally flawed. These deficiencies obstruct a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally lacking and fails to offer a thorough understanding of ecological receptors in the West Lewis coastal environment. This area is not only highly sensitive but also biologically active. However, the baseline data provided is incomplete, and the methodologies used do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential foundation for

evaluating potential impacts.

One significant shortfall pertains to otters, a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leaves unassessed the potential effects arising from construction disturbance, noise, and increased activity. This oversight weakens any conclusions drawn regarding the absence of significant effects on this species.

There are also notable deficiencies in the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate these waters are used frequently. The neglect to incorporate or adequately consider such data results in an incomplete baseline, thereby undermining the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are grounded in assumptions rather than on robust evidence. The lack of sufficient baseline data hinders 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 fulfil the criteria outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The uncertainty introduced by these omissions prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions results in an unreliable assessment. These deficiencies obstruct a robust evaluation of the impacts on marine ecology and protected species and lead to the overarching conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant flaws in its ornithological assessment, which is marked by considerable gaps in evidence and internal contradictions that severely undermine its conclusions. The west coast of the Isle of Lewis hosts internationally important seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not suffer adverse effects from the proposed development. It is crucial to note that the site is situated within key foraging areas and migratory pathways, yet the assessment fails to comprehensively evaluate the implications of potential displacement, collision risk, or habitat loss.

In a fundamental contradiction, the developer asserts that there will be no significant adverse effects, while simultaneously putting forward a Habitats Regulations derogation case, which is mandated only where significant harm is anticipated. This inconsistency raises serious questions regarding the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available. Moreover, the assessment does not sufficiently prove that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not thoroughly acknowledged, and the reliance on modelling introduces a degree of uncertainty, particularly concerning species in critical decline like Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality rates, especially in light of incomplete baseline data and a lack of understanding of behavioural responses.

Furthermore, the positioning of turbines within a recognised migratory corridor introduces a notable and significant risk, effectively establishing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not provide an adequate assessment of the long-term consequences of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

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

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These deficiencies hinder a robust evaluation of potential impacts and lead to the overall conclusion that the application fails to satisfy the statutory requirements necessary for 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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Available summaries highlight that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not speculative. However,

without access to the complete assessment, there is an impediment to properly scrutinising the findings and understanding their significance within the context of decision-making.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts related to the proposed development is severely lacking and does not sufficiently acknowledge the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The addition of large-scale turbines near the shoreline would create a consistent and overwhelming industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape that cannot be reversed.

Moreover, the application fails to accurately depict the magnitude of the visual change. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the defining qualities of naturalness and remoteness. This

level of impact and its significance in such a sensitive landscape has not been properly conveyed in the assessment.

Concerns also arise regarding the selection and representation of visual viewpoints within the methodology. There is evidence to suggest that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been underestimated, thus compromising the assessment's reliability.

Another critical shortcoming is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, leading to an incomplete understanding of the impacts on their setting 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 signifies not only a visual impact but also a broader cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural areas and historical assets. The level of change proposed is incompatible with the mandate to maintain landscape character, visual amenity, and the setting of culturally important sites. The lack of a comprehensive worst-case assessment further diminishes any assertion of policy compliance.

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

Overall, the assessment inadequately represents the scale of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and support the conclusion that the proposal is not compatible with the protection 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 fails to provide a thorough evaluation of the socio-economic impacts and ecological effects on the local marine life and fishing industry. The waters off the West Lewis coast host a rich marine ecosystem, yet the application does not adequately demonstrate how these vital habitats can be preserved without substantial disruption.

One of the main concerns is the flawed assumption that fishing activities can be relocated without repercussions. There is a notable lack of evidence regarding the availability and accessibility of alternative fishing grounds that can bear additional pressures. This critical omission raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. The absence of a

comprehensive assessment impedes a true understanding of the impacts on fisheries and local livelihoods.

The proposal also poses significant threats to marine species, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling over an extended duration is likely to create disturbances that affect marine life, notably the local bottlenose dolphin population. Concerns have been raised about the anticipated disturbance to a significant portion of this population, yet the application downplays these potential effects and lacks sufficient evidence to support its claims.

Moreover, there is an apparent contradiction within the application itself. While it acknowledges the necessity of licences to allow harm to European Protected Species, it simultaneously characterises the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

The assessment does not adequately account for cumulative impacts from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a detailed consideration of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It does not sufficiently prove that the proposed development can coexist with current marine users or avoid significant adverse effects on marine biodiversity, thereby failing to support the notion of sustainable development.

Overall, the absence of concrete evidence regarding fishing displacement, the underestimation of acoustic impacts, and the contradictions found within the assessment lead to a conclusion that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the implications for marine life and local fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is lacking, failing to consider the full scope of impacts from what constitutes a single integrated project. The offshore turbines and onshore works are inherently interconnected, yet they have been evaluated separately. This fragmented approach obscures the true extent of environmental and socio-economic consequences.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. Excavation will occur in areas of deep peat, notably

within Barvas Moor, an important carbon store and ecologically delicate habitat. As a result, the application does not provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The failure to assess the onshore impacts, whether by exclusion or deferral, inhibits proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively. However, the division of offshore and onshore elements means that the combined repercussions on peatlands, habitats, and communities remain inadequately understood.

Furthermore, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not demonstrate a thorough evaluation of impacts on these habitats or the application of appropriate avoidance measures, thus revealing a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbing peatland leads to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application fails to adequately address this issue or show that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land creates potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, raising concerns over both deliverability and lawful execution.

From a policy perspective, the failure to assess the project comprehensively and to demonstrate protection of peatlands, habitats, and land use interests stands in conflict 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.

Collectively, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting, which would be visible over long distances and create a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the identity of the area and the potential for emerging tourism sectors, such as astro-tourism, this omission in the Environmental Impact Assessment is particularly concerning.

Moreover, the absence of an evaluation of impacts on nocturnal wildlife is critical. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application lacks any form of lighting impact assessment or phototaxis study, resulting in a failure to evaluate how aviation lighting could adversely affect these species and potentially increase their mortality rates.

This lack of assessment is exacerbated by the reliance on daytime survey data in the ornithological evaluation, which overlooks nocturnal activity and associated risks. For instance, Kittiwakes may forage or migrate at night and are also susceptible to disorientation from artificial lighting; however, this risk has not been addressed. The failure to provide site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposed development.

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

From a policy standpoint, the omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It further undermines the broader evaluation of landscape and seascape impacts, given that the character of night-time environments is a vital aspect of the overall ecosystem.

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

TOURISM

The evaluation of the tourism impacts within the application is lacking and does not adequately address the economic and social ramifications for an essential sector of the Isle of Lewis. The area's wild coastline, near-pristine landscapes, dark skies, and remoteness are fundamental to tourism, which has seen a notable rise, growing from £65 million in 2017 to over £81.5 million. This growth has facilitated the creation of more than 1,000 jobs, constituting up to 16% of the island's economy. Despite these figures, there is no analysis presented on how large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions.

The application also neglects to consider the significance of environmental quality, which is vital for tourism, particularly regarding unspoiled landscapes and dark skies that enhance visitor experiences and attract emerging markets such as nature-based and astro-tourism. The lack of a Dark Skies Assessment further highlights this

shortcoming, resulting in a considerable gap in understanding the impacts on a growing segment of the local economy.

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

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

In summary, the absence of a thorough quantification of tourism impacts, a disregard for the environmental drivers influencing visitor behaviour, and a lack of consideration for the island's economic dependency lead to a significant evidential gap. This gap hinders a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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.

Additional Comments

This project is incredibly concerning to me.

It is an exploitation of our resources, as has always been done in the Highlands and Islands, suggesting to me that the Highland Clearances are still occurring. People will make wealth from our resources, and we will see few benefits.

Na h-Eileanan an Iar is about to become an Area of Linguistic Significance, which should offer our region the same protections as a Conservation Area. No studies have been done on the impact of this project on language and culture.

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: 90548BBD

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough examination of the Environmental Impact Assessment Report and its supporting documentation reveals several material deficiencies related to planning, the environment, cultural heritage, and procedural aspects. The development site, situated off the west side of the Isle of Lewis, is characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The substantial scale and proximity of the proposal, along with its design, raise significant concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There is critical environmental data missing, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined, and the flexible design framework employed does not allow for a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. As a consequence, the documentation does not facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering the claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are clear and substantial conflicts with existing policies. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests necessary for consent and undermine the ability of the competent authority to deem the development acceptable in terms of policy.

The unprecedented scale of the proposal raises additional concerns, as large turbines would be positioned too close to the shoreline, leading to significant implications for landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance demonstrate that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several critical deficiencies that undermine its reliability and transparency regarding the environmental effects of the proposal. A significant concern arises from the application of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations. This ambiguity leads to considerable uncertainty and hampers the ability to apply a worst-case scenario consistently, thus compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent those of the final development, leaving both the public and the competent authority without a clear understanding of the actual environmental effects.

Furthermore, the application is heavily contingent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. By seeking consent on the premise that any potential environmental harm will be rectified later, the assessment fails to provide a meaningful evaluation of these measures' effectiveness or an accurate appraisal of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly established before making a determination.

Moreover, the report suffers from substantial evidential gaps, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This raises doubts about the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot be reconciled with statutory requirements.

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

In summary, the combination of an undefined design envelope, the absence of specified mitigation strategies, and the presence of significant gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and robust evaluation of the environmental effects, meaning that the competent authority is not adequately positioned to assess the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives, falling short of the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of

offering a systematic and reasoned comparison of feasible alternatives based on their environmental impacts, the submission presents a narrative detailing the evolution of the project. This method does not adequately establish that less harmful options have been thoroughly identified, evaluated, and selected over more damaging alternatives.

There is a noticeable lack of transparency and evidence in the comparison of different offshore locations, development scales, and design configurations. Specifically, the application does not indicate that the developer has genuinely contemplated positioning turbines further offshore, where potential visual, ecological, and coastal impacts would likely be diminished. Considering the delicate nature of the West Lewis coastline and the critical significance of proximity to shore in determining impact, the failure to conduct such analysis obstructs any conclusion that the proposed location is the least damaging option.

This inadequacy also extends to the assessment of cable routing and landfall, where there is insufficient evidence showing that alternative routes have been properly investigated to avoid or reduce impacts on sensitive receptors, including sites of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been utilised, 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 deviation from the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more appropriate alternatives are available. In the absence of a comprehensive alternatives assessment, it cannot be concluded that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, contributing to the overarching conclusion that the application has not undergone adequate scrutiny and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species lacks completeness and reliability in understanding the ecological receptors within the West Lewis coastal environment. This area is known for its biological activity and sensitivity; however, the baseline data provided is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to offer a strong evidential basis for evaluating potential impacts.

A significant oversight involves otters, classified as a European Protected Species, as the application does not adequately recognise or assess their active utilisation of

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

There are further deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, particularly when compared with established land-based observations that suggest frequent usage of these waters. The failure to adequately incorporate or consider such data contributes to an incomplete baseline and diminishes 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 solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty surrounding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

In summary, the combination of 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 contribute to the conclusion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts associated with this development is fundamentally flawed. There are significant gaps in the evidence provided, as well as internal inconsistencies that undermine the validity of its conclusions. The proposal is situated within key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected.

A notable contradiction within the application arises from the developer's conclusion of no significant adverse effects, while simultaneously putting forth a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated, raising questions about the reliability of the assessment and suggesting that its conclusions lack robust evidence. Furthermore, the assessment fails to

adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The crucial feeding grounds associated with these species are not fully taken into account, and the reliance on modelling approaches introduces additional uncertainty, particularly concerning species that are severely declining, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is incomplete and the behavioural responses of the birds are not thoroughly understood.

The placement of turbines within a recognised migratory corridor adds a significant risk, potentially creating a barrier in a primary flight path that is used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential standards needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been attained. This situation engages the precautionary principle and obstructs a lawful conclusion that would support consent.

Additionally, the deficiencies identified suggest a non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be negatively affected places the proposal at odds with national policy.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing poses significant challenges to the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the absence of the full report creates a substantial evidential gap. This omission limits both public understanding and the competent authority's ability to gauge the social risks identified in the developer's own research.

Evidence suggests that residents are currently experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal, with these impacts arising from direct engagement rather than speculation. Nevertheless, the failure to disclose the complete assessment restricts proper scrutiny of these findings and hampers the assessment of their importance in the decision-making process.

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

cohesion, with indications of "cultural loss" noted within the developer's findings. Despite the gravity of these impacts, they have not been adequately incorporated into the primary application nor given the necessary weight. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of disclosure undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning may be compromised. The application does not provide the complete dataset required to establish a thorough evidential basis for balancing benefits against harm.

From a policy perspective, the application does not illustrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and mitigate harm; however, the evidence available indicates existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to demonstrate adherence to this policy.

The procedural implications are substantial, as the competent authority cannot conduct a rigorous socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a critical omission within the application and fails to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation inhibits a lawful determination and reinforces the position that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is fundamentally inadequate and does not reflect the true scale of change or the sensitivity of the receiving environment. The coastline of West Lewis, characterised by its open Atlantic horizon and undeveloped nature, exudes a strong sense of remoteness. The placement of large-scale turbines near the shoreline would lead to a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape that is irreversible.

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

Concerns also arise regarding the selection and representation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This casts doubt on the assessment's reliability, suggesting that the visual impact may have been understated.

Additionally, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. These sites are treated as isolated elements, failing to recognise their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change is incompatible with the obligation to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertions of policy adherence.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resultant change is fundamental and permanent, incapable of being reduced to an acceptable level through any form of mitigation.

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

FISHERIES AND MARINE LIFE

The application proposes a development that inadequately assesses the impacts on fisheries and marine life, failing to provide a thorough evaluation of both ecological and socio-economic consequences. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the proposal does not demonstrate how these vital uses and habitats will be safeguarded against significant disruption.

A critical concern is the assumption made by the application that fishing activities can be shifted without adverse effects. There is no evidence presented to suggest that alternative fishing grounds exist, are accessible, or can accommodate additional fishing pressures. This lack of information is crucial, as the displacement of fishing

efforts could lead to overfishing in other areas, posing broader economic risks to the local fishing fleet. The absence of a clear, evidence-based evaluation means that the repercussions for fisheries and livelihoods remain unclear.

Furthermore, the proposal carries considerable risks for marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended duration is expected to create disturbances across substantial distances, affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises important concerns. However, the application appears to downplay the seriousness of these impacts, lacking adequate supporting evidence.

Additionally, there is a notable inconsistency within the application itself, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously claiming that the impacts are negligible. This contradiction undermines the assessment's credibility and raises questions about adherence to the Habitats Regulations, especially where anticipated harm warrants legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application regarding the project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to account for the interconnected nature of the offshore turbines and onshore works. These elements should be evaluated as a cohesive unit, as their separation obscures the true magnitude of their environmental and socio-economic impacts. The onshore works involve cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Such activities include excavation 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 lack of a thorough assessment of these impacts hinders a complete understanding of the project's overall environmental footprint.

Additionally, by deferring or omitting the assessment of onshore impacts, the application undermines the capacity to evaluate cumulative effects adequately. The Environmental Impact Assessment process mandates that all project components be considered in conjunction, yet the current approach leads to a lack of understanding of the combined effects on peatlands, habitats, and local communities. The risks posed to sensitive habitats such as machair systems and peatland environments, which are protected by policy, remain unaddressed in the application. It does not convincingly demonstrate that thorough assessments of these habitats have been conducted or that suitable avoidance measures have been considered, revealing a significant evidential gap regarding biodiversity protection.

There are also serious concerns about carbon balance stemming from this proposal. The disturbance of peatland can release carbon that has been stored, potentially incurring a carbon debt that contradicts the fundamental goals of renewable energy initiatives. The application falls short in addressing this critical issue, failing to show that the overall carbon balance is indeed favourable.

Moreover, the routing of infrastructure through active croft land raises conflicts with existing land use and legal rights. The application provides insufficient evidence that requisite consents or processes have been initiated, which casts doubt on the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment and the failure to ensure the protection of peatlands, habitats, and land use interests are in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be effectively avoided or mitigated significantly undermines the application. Overall, the disjointed treatment of project components, the absence of a comprehensive evaluation, and the insufficient evidence regarding environmental and land use impacts result in an application that is incomplete and unreliable, thus impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant concern. The coastline of West Lewis is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly in sectors like astro-tourism. The proposed installation of permanent red aviation lighting, visible across long distances, would create an intrusive “wall of light” effect that fundamentally alters the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is particularly troubling given the importance of dark skies to the area's identity. Furthermore, there is no assessment of how this lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel

are notably sensitive to artificial lighting, which can disorient them and increase their risk of collision. The absence of a lighting impact assessment or phototaxis study means that potential effects on these species and related mortality risks remain unexamined.

This shortfall is exacerbated by the use of daytime survey data in the ornithological assessment, which overlooks nocturnal activities and their associated dangers. Species like Kittiwakes, known to 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 presents a critical gap in understanding the ecological implications of the proposal.

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

From a policy standpoint, these omissions contradict National Planning Framework 4, which emphasises the need to protect natural places and uphold environmental quality. Moreover, they compromise the overall evaluation of landscape and seascape impacts, as night-time character is an essential component of the environment.

Overall, the absence of an assessment focused on dark skies and nocturnal wildlife represents a substantial evidential deficiency. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The application does not adequately assess the potential impacts on tourism, a vital sector for the Isle of Lewis economy. With tourism reliant on the area's stunning coastline, unspoiled landscapes, dark skies, and sense of remoteness, the omission of a thorough evaluation of how large-scale offshore infrastructure could affect visitor numbers, behaviours, and the overall economic contribution is concerning. Although it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantified analysis provided.

Tourism on the Isle of Lewis has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, providing more than 1,000 jobs and constituting up to 16% of the island's economy. Despite this impressive growth, the application does not explore how the industrialisation of the seascape and the degradation of environmental quality may impact the Tourism Gross Value Added or the resilience of the broader economy. Such an analysis is crucial to ascertain whether the proposed development would yield a net economic benefit or potentially jeopardise this established sector.

Furthermore, the application overlooks the critical role environmental quality plays in

supporting tourism. The significance of unspoiled landscapes and dark skies to the visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism, are inadequately addressed. The lack of a Dark Skies Assessment exacerbates this gap, failing to provide a comprehensive understanding of the implications for a recognised and growing segment of the local economy.

In an island community where economic diversification is limited, the failure to properly evaluate tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been considered, contravening the 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, particularly concerning economic impacts and the necessity of showing a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking the necessary evidence for the competent authority to thoroughly assess the economic repercussions of the proposal.

Overall, the failure to quantify tourism impacts, examine the environmental factors influencing visitor behaviour, and recognise the island's economic reliance culminates in a significant evidential gap. This hinders a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development when evaluated against statutory duties and national policy. The concerns raised are similar to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. The current application, while submitted under a more robust policy framework, still lacks necessary considerations for biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant shortcomings in the evidential basis for this proposal. It fails to provide reliable baseline data, relies on an undefined design envelope, and does not specify its mitigation measures. Critical pathways of impact, including effects on nocturnal wildlife, onshore infrastructure, and tourism, have been overlooked. This renders the Environmental Impact Assessment incomplete, hindering an understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment constitutes a serious omission. These failures hinder a proper assessment of impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal contradicts the National Planning Framework 4. It does not adequately demonstrate protection of biodiversity, natural spaces, and cultural heritage. Additionally, it fails to show acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been assessed appropriately, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals raise concerns. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been reached, engaging the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, this application is procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. The competent authority must refuse consent or require the submission of the 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

I have spent a few holidays enjoying the quiet isolation of Lewis and it's beautiful coastline.

As part of our holidays we took boat trips enjoying both the scenery and wildlife.

I see this development as detrimental to the peacefulness and wildlife being enjoyed on future holidays.

While I will always appreciate a cycle path, I'm not happy about the cost to the environment nor the usefulness to locals.

I'm especially concerned there is no decommission plan. That all this junk will be left in our waters for generations to come without an understanding of the environmental impact.

I am a huge supporter of renewable energy but not at any cost.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 22895D87

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the marine licensing and Environmental Impact Assessment processes. The objection is grounded in a thorough evaluation of the Environmental Impact Assessment Report and accompanying documentation, which reveal significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, largely unspoiled environment, and strong cultural heritage. The dimensions, proximity, and overall design of the project raise essential concerns about its alignment with statutory obligations, national policies, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful assessment. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal are not clearly defined. The flexible design framework employed inhibits a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a complete or informed assessment of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsubstantiated by robust evidence.

Substantive conflicts with existing policy are evident. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable from a policy perspective.

The scale of the project is without precedent in this region, with large turbines proposed in very close proximity to the shoreline. This raises significant concerns regarding the capacity of the landscape, visual dominance, and environmental consequences. In summary, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy inconsistencies illustrate that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application demonstrates significant evidential deficiencies, as it presents gaps in baseline data, limitations in methodology, and an over-reliance on assumptions instead of site-specific evidence. This lack of robust supporting data leads to uncertainty concerning the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn. Consequently, the absence of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that conflicts with statutory requirements.

Furthermore, the Environmental Impact Assessment Report is materially deficient, failing to deliver a full, transparent, or reliable account of the potential environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces significant uncertainty and hinders the consistent application of a worst-case scenario. This situation undermines the integrity of the assessment, obscuring the true extent of environmental effects from both the public and the competent authority.

The application also depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed at a later stage prevents any meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement of essential information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation measures are established clearly prior to determination.

As a result of these deficiencies, the application fails to meet the evidential threshold set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, including requirements related to biodiversity protection and environmental integrity, as it remains unproven that impacts have been fully assessed or that suitable safeguards are in place.

In conclusion, the combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data culminates in an Environmental Impact Assessment Report that is both unreliable and incomplete. These flaws prevent a lawful and robust assessment of environmental effects, leaving the competent authority incapable of making an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a comprehensive assessment of alternatives, which does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental impacts, it provides a narrative detailing the project's evolution. This method fails to demonstrate that less harmful options have been

sufficiently identified, evaluated, and chosen over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has adequately considered positioning turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in determining impacts, the lack of such analysis prevents any determination that the proposed siting is the least damaging option.

These shortcomings extend to the cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been employed, resulting in a reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. In the absence of a robust assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is severely lacking, failing to provide a comprehensive understanding of the ecological receptors within the West Lewis coastal environment. This area is a biologically rich and sensitive marine system, yet it suffers from incomplete baseline data and inadequate methodologies that do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant oversight involves otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or assess their active use of coastal regions for foraging and movement. This omission regarding their core foraging range and behavioural patterns means that the potential effects of construction

disturbance, noise, and increased human activity have not been properly evaluated. This gap undermines the conclusions drawn about the absence of significant effects on otters.

The assessment of basking sharks also displays major deficiencies, particularly due to the reliance on aerial surveys, which are prone to detection bias in Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate frequent use of these waters. The failure to consider or incorporate relevant data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings mean that assertions of negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, thereby introducing uncertainty regarding the true risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4. Protected species have not been properly identified or assessed, which leads to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it would be unlawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application is marred by significant methodological weaknesses and internal inconsistencies, resulting in an unreliable evaluation of impacts. Notably, the application does not adequately demonstrate that internationally important seabird populations, many of which are already in decline, will remain unaffected by the proposed development. The west coast of the Isle of Lewis is a critical habitat for these species, yet the assessment fails to provide sufficient evidence that their foraging areas and migratory pathways will be preserved.

Moreover, a fundamental contradiction is evident within the application. While the developer asserts that there will be no significant adverse effects, they simultaneously advance a Habitats Regulations derogation case, which is only required in scenarios where significant harm is anticipated. This inconsistency raises serious doubts about the validity of the conclusions drawn in the assessment, indicating that they are not substantiated by the underlying evidence.

The assessment also does not adequately address the importance of key feeding grounds associated with protected sites such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches introduces substantial uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, and there is a likelihood that mortality rates are underestimated. This concern is exacerbated by incomplete baseline data and a lack of understanding of species' behavioural responses.

The siting of turbines within a recognised migratory corridor adds another layer of risk, creating a potential barrier to primary flight paths used by species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality within this corridor, particularly for species with small global populations, have not been adequately assessed.

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

Furthermore, the identified deficiencies reflect a failure to comply with National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects places this proposal in direct opposition to national policy. Collectively, these factors culminate in the conclusion that the assessment does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Moreover, the application fails to consider intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship the community has with the coastal environment. These aspects are essential to the area's identity but are entirely

omitted from the assessment, marking a significant gap. Without recognising these factors, the true cultural impact of the development remains inadequately understood.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal 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 its open Atlantic horizon, undeveloped character, and a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts does not adequately reflect the significant changes that would occur, nor does it consider the sensitivity of the environment. The proposed large-scale turbines, situated in close proximity to the shoreline, would create a continuous and dominant industrial presence that fundamentally alters the character of the landscape, leading to a permanent and irreversible transformation.

Furthermore, the application does not sufficiently represent the magnitude of the visual changes that would arise. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations. This dominance would directly impact visual amenity and erode the essential qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact within the context of such a sensitive landscape.

There are significant methodological concerns regarding the selection and presentation

of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This introduces the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, the assessment neglects to address the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these heritage assets in isolation, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal conflicts with National Planning Framework 4, specifically regarding the protection of natural places and historic assets. The scale of the proposed changes is incompatible with the requirement to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in a presence that is dominant and unavoidable. Consequently, the changes anticipated are fundamental and permanent, rather than capable of being 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 interconnected nature of landscape and heritage. These deficiencies prevent a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents a significant deficiency in the assessment of construction and pollution risks, leaving critical details lacking for evaluating the likely environmental effects. Substantial seabed preparation and installation works will take place within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on future mitigation and contingency measures that are to be prepared after consent, which prevents any meaningful assessment of their adequacy or effectiveness.

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

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

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application restricts the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation need to be assessed prior to consent, and when such information is absent, a lawful determination cannot be achieved. 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 clarity regarding potential impacts renders the assessment materially deficient. These shortcomings hinder a thorough evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment 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 onshore infrastructure within the project is significantly deficient and does not adequately address the full range of impacts stemming from what constitutes a singular integrated project. The intrinsic link between the offshore turbines and the onshore works has not been recognised, leading to a disjointed evaluation that fails to reveal the true magnitude of the environmental and socio-economic ramifications.

The onshore components encompass cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of associated access infrastructure through ecologically sensitive landscapes. These activities involve excavating areas characterised by deep peat, particularly within Barvas Moor, which represents an important carbon store and ecologically delicate

habitat. The current application lacks a thorough assessment of these effects, thus obscuring a complete understanding of the project's overall environmental footprint.

The omission or postponement of assessments concerning onshore impacts obstructs an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be evaluated in conjunction, yet the segregated examination of offshore and onshore elements results in an incomplete comprehension of the combined impacts on peatlands, habitats, and local communities.

Moreover, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application has not sufficiently evidenced that the impacts on these habitats have been comprehensively evaluated or that suitable avoidance measures have been implemented, thereby creating a notable evidential gap with respect to biodiversity preservation.

Further concerns arise regarding carbon balance; the disturbance of peatland may release stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy initiatives. The application fails to adequately confront this issue or to prove that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land presents possible conflicts with pre-existing land use and legal rights. The application does not substantiate that the requisite consents or processes have been initiated, casting doubt on the project's deliverability and legal execution.

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

Collectively, the fragmentation of project elements, the absence of a thorough assessment, and the lack of evidence concerning environmental and land use impacts render this portion 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. However, the Environmental Impact Assessment fails to consider dark skies and nocturnal wildlife, representing a serious oversight. The proposed development would introduce permanent red aviation lighting that would be visible over long distances. This would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

There is no assessment of the impact this lighting would have on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the local identity and to emerging tourism sectors like astro-tourism, this omission is particularly concerning. The application also neglects to evaluate the effects on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are at risk of disorientation and increased collision due to artificial lighting. The lack of any lighting impact assessment or phototaxis study means the potential effects on these species and their mortality risk remain unexamined.

This gap is made worse by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, known to forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data creates a critical void in understanding ecological impacts.

Without evaluating these nocturnal impacts, it is impossible to determine if protected species or designated sites would face adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, triggering the precautionary principle and obstructing a lawful determination.

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

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

TOURISM

The application presents a materially deficient assessment of tourism impacts, overlooking the economic and social ramifications for a crucial 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. Despite acknowledging that 86% of visitors are attracted by scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure might 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. Nevertheless, the application does not analyse how the industrialisation of the seascape and the degradation of environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the area.

Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment neglects to examine the significance of environmental quality in fostering tourism, including the necessity of unspoiled landscapes and dark skies for enhancing visitor experiences, as well as the growing markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant gap in the understanding of impacts on a recognised and burgeoning segment of the local economy.

In the context of an island community characterised by limited economic diversification, the failure to evaluate tourism impacts holds broader consequences for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been assessed as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the requirement to show net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic repercussions of the proposal.

Ultimately, the inability to quantify tourism impacts, assess environmental factors influencing visitor behaviour, and consider the island's economic dependency culminates in a significant evidential gap. This hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite the introduction of a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current proposal fails to adequately address these concerns.

A reliable evidential basis for determination is not provided in the application. There are notable deficiencies in baseline data, reliance on an ill-defined design envelope, unspecified mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

There are procedural failures present in the application. The lack of a compliant Island

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

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

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

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

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

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

Additional Comments

All the above.

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: FA46ED1F

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents has revealed 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 heritage. The design, scale, and proximity of the proposal raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a lawful decision. There are critical gaps in environmental data, with baseline information being both limited and inconsistent. Additionally, many essential elements of the proposal remain undefined. The adoption of a flexible design framework hampers a clear assessment of likely significant impacts, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the provided documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidential support.

There are also evident and significant policy contradictions. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regulations, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not establish that it can meet national obligations to safeguard biodiversity, climate concerns, and environmental integrity. These discrepancies directly relate to the statutory requirements for consent and compromise the capability of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal involves large turbines located in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policies indicate that the application is incomplete and incapable of supporting a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed as it relies on an incomplete Environmental Impact Assessment Report that lacks transparency and reliability regarding the expected environmental effects of the proposed development. A flexible Project Design Envelope is used, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hampers the consistent application of a worst-case scenario. As a result, the assessment's integrity is compromised, and the impacts outlined may not accurately represent the development that is ultimately built. This situation inhibits both the public and the competent authority from gaining a true understanding of the environmental implications.

Furthermore, the application is built on an over-reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. As a result, consent is sought based on the premise that environmental harm will be addressed in the future, which thwarts any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of crucial information until after consent has been granted is procedurally unacceptable and runs contrary to the aims of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established before any determination can take place.

The report exhibits notable evidential deficiencies, with significant gaps in baseline data and limitations in methodology. It relies on assumptions rather than site-specific evidence, leading to uncertainty regarding the magnitude and significance of impacts. This is particularly concerning where conclusions of negligible or non-significant effects are claimed without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory requirements.

Consequently, the application fails to meet the evidential standard set by the Habitats Regulations to discount adverse effects beyond reasonable scientific doubt. The precautionary principle must be invoked here, especially concerning protected species and sensitive habitats. Additionally, the proposal does not comply with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report not only unreliable but also incomplete. These shortcomings hinder a lawful and comprehensive evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is fundamentally inadequate, failing to provide a thorough and reliable understanding of ecological receptors in the West Lewis coastal area. This marine environment is both sensitive and biologically

vibrant, yet the baseline data is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment does not establish a robust evidential basis for assessing potential impacts.

One significant oversight pertains to otters, a species protected under European law. The application does not appropriately acknowledge or assess their active utilisation of coastal regions for foraging and movement. The absence of an evaluation of their core foraging range and behavioural patterns indicates that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently analysed. This gap undermines any assertions regarding the absence of significant effects on the otter population.

Deficiencies also arise in the assessment of basking sharks. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent activity in these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Furthermore, the lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species have not been conducted thoroughly. The level of uncertainty presented hampers the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent is not legally permissible.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions undermines the reliability of the assessment. These deficiencies obstruct a comprehensive evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the proposed development lacks the evidential rigor necessary to conclude that there will be no adverse effects on protected sites. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. However, the assessment fails to adequately demonstrate that these species will remain unaffected. Furthermore, the siting of

turbines within a recognised migratory corridor poses an additional and substantial risk, as it potentially obstructs a primary flight path for species migrating between the United Kingdom and Iceland. The implications of sustained mortality within this corridor have not been sufficiently evaluated.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is not merely a geographical area; it embodies a living cultural landscape where environment, language, tradition, and community interlink deeply. The assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage as a series of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community. This reductive approach fails to acknowledge the integral nature of these cultural elements.

A significant shortcoming is evident in the treatment of important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment incorrectly categorises them as static features. This oversight neglects their continuous use and meaning, resulting in an incomplete understanding of the cultural effects and disregarding their significance

within community life.

The application also neglects to assess intangible cultural heritage, including the Gaelic language and traditions that form the foundation of community identity in the area. This omission is notable as these elements are vital to understanding the cultural impact of the development. Without their inclusion, the assessment remains deficient and fails to capture the true cultural cost of the proposed development.

Additionally, there are critical concerns regarding community rights and engagement. The Gaelic-speaking population, recognised as having the characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and does not adhere to established principles of participation concerning cultural and environmental interests.

Moreover, a significant procedural failure exists due to the absence 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 duty to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy perspective, these deficiencies place the proposal at odds with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with a disregard for living cultural practices, signifies a clear deviation from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application fails to provide a sufficient basis for evaluating the genuine cultural implications of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

There are indications that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been derived from direct engagement with the community and are therefore based on observable facts rather than speculation. However, the failure to disclose the full

assessment hinders proper scrutiny of these findings, limiting the ability to assess their significance in the decision-making process.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment conducted on seascape, landscape, and visual impacts lacks sufficient detail and does not accurately reflect the scale of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by an open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. Introducing large-scale turbines near the shoreline would create an industrial presence that is both continuous and dominant, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application fails to adequately depict the extent of visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual

amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not effectively convey the significance of this impact within such a sensitive landscape context.

Methodological issues also arise concerning how visual viewpoints were chosen and presented. Evidence suggests that some viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially regarding critical cultural heritage sites and valued landscapes. This raises concerns that the visual impact's magnitude may have been understated, which in turn compromises the reliability of the assessment.

Another notable deficiency is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are not isolated; they are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment fails to acknowledge this interdependence, leading to an incomplete understanding of the impacts on both their setting and cultural significance.

Industrialising the seascape would disrupt these connections, changing how heritage assets are perceived and severing their ties to the natural horizon. This presents not just a visual issue, but also cultural and spatial harm that has not been sufficiently examined in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The extent 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 robust worst-case assessment further undermines any assertion of compliance with policy.

Moreover, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resultant change is therefore fundamental and permanent, and not 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 interlinked nature of landscape and heritage. These shortcomings prevent a reliable evaluation and support the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal is fundamentally flawed due to an incomplete assessment of construction and pollution risks, which lacks the necessary detail to evaluate the likely environmental effects. The West Lewis coastline, characterised by clean coastal waters and significant habitats, is particularly sensitive to disturbances, yet the application does not provide fully developed Construction Environmental Management

Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be devised after consent, obstructing a meaningful assessment of their adequacy and effectiveness.

Concerns are amplified by the application's acknowledgment of risks such as sediment mobilisation and accidental spills of chemicals or oil, yet it fails to detail how these will be prevented, controlled, or monitored. This reliance on undefined future measures is particularly troubling given the environmental sensitivities involved. Furthermore, there remains considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, the potential extent, duration, or ecological effects of these impacts cannot be established, leaving the effects on sensitive marine species and habitats inadequately addressed.

Additionally, the absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent is granted, the application effectively undermines the assessment of whether adequate safeguards are in place to address potential pollution events. This introduces significant procedural risks, hindering the competent authority's ability to evaluate the proposed environmental protection measures at the point of determination.

From a regulatory standpoint, the deferment of essential environmental safeguards is in direct conflict with the requirements of the Environmental Impact Assessment regime. It is mandated that likely significant effects and mitigation be assessed prior to consent, and the absence of this critical information renders a lawful determination impossible. The application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these vital uses and habitats will be protected from significant disruption. The assessment of fisheries and marine life is inadequate and fails to provide a thorough evaluation of the ecological and socio-economic impacts involved.

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

on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses significant risks to marine species, notably through underwater noise generated during construction. The use of high-energy hammer piling for extended periods is expected to disturb marine life across large distances, notably affecting species such as dolphins. The anticipated disruption to a substantial portion of the local bottlenose dolphin population presents serious concerns, yet the application downplays these effects, lacking adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes significant infrastructure developments such as cabling across protected moorland and the construction of a substation near Stornoway, with access routes traversing sensitive landscapes. These operations involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically delicate habitat. However, the application fails to provide a comprehensive assessment of the impacts on these crucial environments, limiting our understanding of the project's overall environmental footprint.

The separation of the offshore turbines and onshore works is a critical flaw, as these components are intrinsically linked yet assessed independently. This fragmented approach obscures the true scale of the environmental and socio-economic effects that arise from the project, preventing a thorough evaluation of cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project

be considered collectively, but this is not the case here. Consequently, the combined impacts on peatlands, habitats, and local communities are inadequately understood.

In addition to this, the application does not convincingly demonstrate that the impacts on sensitive habitats, including machair systems and peatland environments that are subject to policy protection, have been thoroughly assessed. It raises evident gaps in relation to biodiversity protection, indicating a lack of appropriate avoidance measures.

Concerns also arise regarding the carbon balance due to the disturbance of peatland, which can release stored carbon and create a carbon debt, contradicting the objectives of renewable energy development. Unfortunately, the application does not sufficiently address this matter or prove that the overall carbon balance remains beneficial.

Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is a lack of evidence showing that necessary consents or processes have been initiated, which raises significant questions about 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 National Planning Framework 4. The inability to prove that the impacts can be avoided or mitigated further diminishes the reliability of the application.

Taken as a whole, the separation of project components, the lack of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts result in an incomplete and unreliable application, thereby hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are essential for environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment neglects to assess the impacts of this proposal on dark skies and nocturnal wildlife, representing a significant oversight. The introduction of permanent red aviation lighting will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Moreover, the application fails to evaluate how this lighting will affect visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area's identity and the growing tourism sector of astro-tourism, this omission is particularly concerning. The lack of consideration for these impacts demonstrates a clear gap in the overall landscape and environmental assessment.

In addition, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can disorient them and increase the risk of

collisions. The absence of a lighting impact assessment or phototaxis study means that the application does not evaluate how aviation lighting might impact these species or contribute to their mortality.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has gone unassessed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

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

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

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

TOURISM

The application presents a serious shortcoming in its evaluation of tourism impacts, crucial for understanding the economic and social implications for the Isle of Lewis. Tourism in this area is heavily reliant on its wild coastline, nearly untouched landscapes, dark skies, and a distinct sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, the assessment does not quantify how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this key sector.

The tourism industry has seen remarkable growth, expanding from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application fails to model the potential impacts of seascape industrialisation and the decline in environmental quality on Tourism Gross Value Added and broader economic resilience. This lack of analysis hampers the ability to ascertain whether the proposed development would provide a net economic benefit or pose a threat to an established and flourishing sector.

Furthermore, the assessment neglects to consider how environmental quality underpins tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience, as well as emerging markets like nature-based tourism and

astro-tourism. The absence of a Dark Skies Assessment exacerbates this issue, leading to a substantial gap in understanding the effects on a vital and expanding segment of the local economy.

In a community where economic diversification is limited, the oversight in assessing tourism impacts has broader repercussions for employment, local enterprises, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated in accordance with the requirements outlined in the Islands (Scotland) Act 2018.

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

In summary, the combined failures to quantify tourism impacts, evaluate the environmental factors that influence visitor behaviour, and account for the island's economic dependence lead to a significant evidential gap. This undermines the possibility of a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria of sustainable development as evaluated against statutory obligations, national policies, and evidential standards. This application echoes the critical issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Presenting it now under a policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing does not mitigate these concerns.

Moreover, the application lacks a complete and reliable evidential basis for decision-making. There are significant deficiencies in baseline data, the utilisation of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of vital impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of potential significant effects or residual impacts.

Additionally, clear procedural shortcomings exist. The failure to submit a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, and not disclosing the full Social Impact Assessment is a substantial omission. These gaps inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4. It does not demonstrate effective protection of biodiversity, natural environments, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit as it lacks tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore elements have not been adequately assessed, thereby obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and obstructing a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

I am against the construction of the Spiorad na Mara windfarm for multiple reasons. The sheer scale will have a massive visual impact down the length of the westside of Lewis. The environmental impact will be huge. I don't believe that the reality for local people, wildlife and the environment has been truly considered.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C1FEE9CB

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the development raise serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not present an adequate evidential foundation for a lawful decision. There are notable gaps in critical environmental data, while the baseline information is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The reliance on a flexible design framework complicates the assessment of likely significant effects, and the proposed mitigation measures have not been specified, rendering their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

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

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential details, failing to deliver a transparent or comprehensive overview of the potential environmental consequences of the proposed development. By employing a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, the assessment introduces considerable uncertainty. This compromises the integrity of the evaluation, making it impossible for both the public and the competent authority to grasp the true nature of environmental effects, as the impacts reported may not accurately reflect what will ultimately be constructed.

The application is overly reliant on mitigation measures, monitoring strategies, and management plans that have not yet been clearly defined. Seeking consent based on the premise that environmental harm will be addressed in the future undermines any genuine evaluation of effectiveness or analysis of residual impacts. Deferring critical information until after consent is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be established prior to the determination process.

Significant evidential shortcomings exist within the application, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainties regarding the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are drawn without substantial supporting data. The lack of adequate information impedes a clear understanding of cumulative and worst-case impacts, and introduces scientific uncertainties that do not meet statutory requirements.

Consequently, the application fails to fulfil the evidential requirements stipulated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This raises concerns related to the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured comparison of realistic alternatives, which is crucial under the Environmental Impact Assessment regime. Instead, it offers a narrative about the project's development that does not adequately identify or assess

less harmful options in favour of more damaging solutions. This inadequacy is evident in the absence of a transparent, evidence-based comparison of alternative offshore locations, scales of development, or design configurations. Notably, the developer has not adequately considered placing turbines further offshore, where the impacts on visual aesthetics, ecology, and the coastline could potentially be less severe. The significance of the West Lewis coastline, particularly concerning proximity to shore, underscores the need for such analysis to determine whether the proposed siting is indeed the least damaging option.

Moreover, the deficiencies extend to the cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies a failure to apply mitigation by design, relying instead on post-design measures that may not adequately address the environmental concerns at hand.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and routing of infrastructure. This oversight highlights a failure to adhere to the established mitigation hierarchy and obstructs the competent authority's ability to assess whether there are less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, the proposal cannot be deemed sustainable or compliant with policy requirements.

From a policy standpoint, this shortcoming compromises adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a significant omission that leads to the conclusion that the application has not undergone adequate scrutiny and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment suffers from significant deficiencies, leading to an incomplete understanding of ecological receptors in this biologically active marine system. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of key species, which results in a lack of a solid evidential basis for evaluating potential impacts.

A major concern is the inadequate recognition and assessment of otters, a European Protected Species, particularly their active use of coastal areas for foraging and movement. The failure to account for their core foraging range and behaviour means that the implications of construction disturbance, noise, and increased activity have not been thoroughly examined. This raises doubts about the conclusions drawn regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks demonstrates further shortcomings, as it relies heavily on aerial surveys that are prone to detection bias under Atlantic conditions. Such an approach is likely to lead to an underestimation of their presence, especially when compared to established land-based observations indicating a frequent use of these waters. The neglect to incorporate relevant data results in an inadequate baseline and undermines the reliability of the findings.

These methodological shortcomings lead to conclusions about negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the genuine scale of risk 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 fails to properly identify or assess protected species. The uncertainty created by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Therefore, consent cannot be lawfully granted under these circumstances.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development lacks reliability due to significant internal inconsistencies, methodological weaknesses, and gaps in evidence. It fails to demonstrate that internationally important seabird populations, which are already experiencing declines, will not be adversely affected. The west coast of the Isle of Lewis, known for its key foraging areas and migratory pathways, is significantly impacted by the siting of turbines within a recognised migratory corridor. This creates a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland, and the application does not sufficiently assess the long-term implications of sustained mortality within this corridor.

Contradictions within the application further undermine its credibility. The developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which suggests that significant harm is expected. Such inconsistency raises serious doubts about the reliability of the assessment, indicating that the conclusions drawn are not adequately supported by the evidence provided.

Moreover, the assessment does not adequately address the impact on seabirds associated with protected sites like the Lewis Peatlands and St Kilda. The significance

of these feeding grounds is insufficiently acknowledged, and reliance on modelling approaches adds uncertainty, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies used are likely to underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain poorly understood.

From a regulatory standpoint, 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, along 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 precludes a lawful conclusion that supports consent. The identified deficiencies also signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. Ultimately, the inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy.

In summary, the overall conclusion is that the application does not fulfil the statutory requirements needed for determination, due to the unreliability of the assessment arising from its inherent inconsistencies, methodological flaws, and lack of sufficient evidence.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal under review demonstrates a fundamental inadequacy in the assessment of cultural heritage and community identity. It fails to recognise the West Lewis coastline as a living cultural landscape, where environment, language, tradition, and community are deeply interconnected. Rather than acknowledging the ongoing social, cultural, and spiritual functions of heritage within the community, the application adopts a reductive approach that treats heritage as isolated, static assets.

A significant shortcoming is evident in the treatment of culturally significant sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These cemeteries are active burial and spiritual practice sites, yet they have been categorised as static features in the assessment. This oversight neglects their continued use and meaning, as well as the development's impact on their setting. The resulting mischaracterisation leads to an incomplete evaluation of cultural effects and ignores the cemeteries' roles within community life.

Furthermore, the assessment neglects intangible cultural heritage aspects, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity, yet they are entirely absent from the evaluation, representing a significant omission. Without incorporating these factors, the true cultural impact of the development cannot be understood.

Concerns regarding community rights and engagement are also paramount. The

Gaelic-speaking population has a unique cultural identity that aligns with characteristics of an Indigenous People, but the absence of a Free, Prior and Informed Consent process undermines the legitimacy of the assessment. This lack of meaningful engagement fails to reflect established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This omission precludes 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 place the proposal in direct conflict with the National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, as well as the lack of recognition of living cultural practices, constitutes a clear deviation from policy requirements.

In summary, the combined failures to assess living heritage, intangible cultural value, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application lacks a sufficient foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical concern that undermines the integrity of the evaluation process. While the developer has engaged in the collection of data through focus groups with local residents, the failure to publish the full report creates a significant evidential gap. This gap inhibits both public understanding and the competent authority's ability to fully assess the social risks identified through the developer's own research.

Evidence suggests that residents are currently facing measurable stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts are based on direct engagement rather than speculation. However, the absence of the complete assessment restricts proper scrutiny of the findings, thereby limiting the capability to evaluate their significance in the decision-making framework.

Furthermore, there is substantial indication that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings highlighting a risk of "cultural loss." Despite the recognition of these impacts, they have not been adequately incorporated into the main application nor given the necessary weight in the evaluation process. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

The implications of this lack of transparency are far-reaching, as it undermines the

Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functioning may be at stake. The failure to provide the full dataset means that the application lacks a comprehensive evidential basis needed to assess the balance between benefits and harm effectively.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. The development is required to support positive health outcomes and mitigate harm, yet the available evidence reveals existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this essential policy cannot be established.

The procedural ramifications of these issues are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission within the application, failing to meet the evidential standards outlined in the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This deficiency obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to be properly considered.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the proposed development's impacts on seascape, landscape, and visual quality is significantly lacking and fails to adequately account for both the scale of change and the sensitivity of the surrounding environment. The West Lewis coastline, characterised by its open Atlantic horizon, undeveloped nature, and pronounced sense of remoteness, is at risk of being fundamentally altered by the introduction of large-scale turbines positioned near the shore. This would result in a persistent industrial presence that would irrevocably transform the landscape.

Moreover, the application does not sufficiently convey the extent of the visual change anticipated. Given their scale and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment's failure to accurately represent this level of impact and its significance within such a sensitive landscape is a critical oversight.

Methodological issues also arise concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, especially concerning significant cultural heritage sites and areas of high landscape value. This introduces a risk of underestimating the magnitude of visual impact, thereby compromising the reliability of the assessment.

Additionally, the assessment does not consider the interconnected relationship between landscape, seascape, and cultural heritage adequately. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment overlooks their interdependence, leading to an incomplete understanding of how impacts on their setting and cultural significance arise.

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 situation represents not only a visual impact but also a wider cultural and spatial detriment that has not been properly assessed in the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4 regarding the safeguarding of natural spaces and historic assets. The anticipated scale of change is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the absence of a comprehensive worst-case assessment further undermines claims of compliance with policy requirements.

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

In summary, the assessment falls short in accurately depicting the extent of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies preclude a reliable evaluation and affirm the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks lacks completeness and fails to provide the necessary detail to evaluate potential environmental effects. The proposal entails significant seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures to be formulated after consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

This dependence on undefined future measures raises significant concerns due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disruption and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on prevention, control, or monitoring strategies.

Additionally, there is uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installation. Without comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also relates to potential effects on sensitive marine species and habitats identified in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether appropriate safeguards are in place to address pollution incidents. This introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures during the determination process.

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

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts all contribute to a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application under review fails to adequately protect or maintain these vital uses and habitats without significant disruption. A fundamental concern is the assertion that fishing activity can be displaced without consequences. The application lacks evidence to confirm that alternative fishing grounds are available, accessible, or able to support additional pressure. This is a crucial oversight, as displacement poses the risk of overfishing in other areas and could lead to adverse economic repercussions for the local fishing fleet. The impacts on fisheries and the livelihoods dependent on them cannot be accurately assessed in the absence of a clear and evidence-based evaluation.

The proposal also presents notable risks to marine species, particularly due to underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to disturb marine life across considerable distances, adversely affecting species such as dolphins. The potential disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. Nonetheless, the application minimises the significance of these

effects without adequate supporting evidence.

In addition, there is a discernible inconsistency within the application concerning the acknowledgment of the need for licences to permit harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This contradiction calls into question the credibility of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, particularly when harm is anticipated to such a degree that it necessitates legal authorisation.

Furthermore, the assessment does not adequately 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 remains impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions that rely on them.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that the proposal reflects sustainable development.

Overall, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies contribute to an assessment that is incomplete and unreliable. These deficiencies hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not take into account the full range of impacts associated with what constitutes a single integrated project. There is an intrinsic link between the offshore turbines and the onshore works, which are assessed separately. This fragmented approach conceals the true magnitude of the environmental and socio-economic repercussions.

The onshore components comprise cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

By omitting or delaying the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered collectively; however, the separation of offshore and onshore elements results in a lack of understanding regarding the combined effects on peatlands, habitats, and local communities.

There are considerable risks to vulnerable habitats, such as machair systems and peatland environments, which benefit from policy protection. The application does not show that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a notable evidential gap in terms of biodiversity protection.

The proposal also poses concerns regarding carbon balance. Disturbance to peatland can release stored carbon, potentially leading to a carbon debt that opposes the goals of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not supply evidence that necessary consents or processes have been initiated, casting doubt on the project's deliverability and lawful implementation.

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

Collectively, the disjunction of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this section of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding nocturnal wildlife and dark skies represents a substantial gap in the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which play a crucial role in the area's environmental quality, cultural identity, and tourism potential. The proposal includes permanent red aviation lighting that would create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application neglects to evaluate how this lighting might impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly significant given the vital role dark skies play in the identity of the area and the growth of tourism sectors such as astro-tourism. The failure to consider these aspects leads to a clear deficiency in the overall landscape and environmental evaluation.

More critically, there is no assessment of the potential impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel

are particularly susceptible to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The absence of a lighting impact assessment or phototaxis study means that the application does not address how the proposed aviation lighting might affect these species or lead to increased mortality rates.

This oversight is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities or the associated risks. Kittiwakes, for example, may forage or migrate at night and are also at risk of disorientation from artificial lighting, yet this hazard has not been evaluated. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

Without an assessment of nocturnal effects, it is impossible to determine whether protected species or designated sites would face adverse impacts. The necessary evidential standard to exclude potential adverse effects cannot be met, thereby invoking the precautionary principle and hindering lawful determination.

From a policy standpoint, these omissions are in conflict with National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. Additionally, they weaken the comprehensive assessment of landscape and seascape impacts, as night-time character is an essential part of the overall environment.

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

TOURISM

The proposed development raises significant concerns regarding its potential impacts on tourism, a vital sector for the Isle of Lewis. Tourism thrives on the area's wild coastline, nearly untouched landscapes, dark skies, and the feeling of remoteness, yet the application lacks a thorough assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this sector. Although it is acknowledged that 86% of visitors are attracted by the scenery, the application fails to provide a quantified evaluation of these factors.

Tourism on the Isle of Lewis has seen notable growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the proposal does not model the potential effects of seascape industrialisation and environmental degradation on the Tourism Gross Value Added or the broader economic resilience of the area. Without such crucial analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise this established and expanding sector.

Moreover, the assessment neglects the critical role of environmental quality in

bolstering tourism, including the significance of unspoiled landscapes and dark skies for visitor experiences and emerging sectors like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the potential consequences for a recognised and growing segment of the local economy.

In a context where the island community has limited economic diversification, the lack of assessment on tourism impacts poses broader risks for employment, local enterprises, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately evaluated, contravening the requirements of the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4, especially regarding economic impacts and the obligation to show net benefits. It also contradicts strategic objectives that emphasise tourism as a priority growth sector, failing to present sufficient evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and consider the economic dependency of the island leads to a significant evidential gap. This deficiency hampers a comprehensive evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal poses significant concerns regarding its compliance with sustainable development criteria as outlined by statutory obligations, national policies, and evidential standards. The application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal fails to address fundamental requirements.

There are critical deficiencies in the evidential basis for determining the application. The reliance on an undefined design envelope, gaps in baseline data, unspecified mitigation measures, and the exclusion of essential impact pathways—such as nocturnal wildlife, complete onshore infrastructure, and the effects on tourism—render the Environmental Impact Assessment incomplete. Consequently, it does not provide a comprehensive understanding of likely significant effects or residual impacts.

Moreover, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to present a full Social Impact Assessment constitutes a significant omission. These gaps hinder the competent authority's ability

to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is also at odds with National Planning Framework 4, failing to safeguard 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, as tourism impact modelling is absent. The cumulative effects of offshore and onshore elements have not been adequately assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

Overall, the application is both procedurally and substantively inadequate for determination. The significant deficiencies in information, combined with conflicts with policies and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or exercise relevant regulatory provisions to mandate the submission of the required information.

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

Additional Comments

FORMAL OBJECTION TO N4 (SPÌORAD NA MARA) WIND FARM PROPOSAL

Introduction and Summary

I wish to formally object to the proposed N4 (Spìorad na Mara) wind farm development.

I want to state clearly and unequivocally that I do not support this development and believe it should not proceed.

This is a relatively small island in one of the most beautiful and environmentally sensitive parts of Scotland. A development of this scale is fundamentally incompatible with the character, ecology, and cultural significance of this location. The impacts would be extensive and irreversible, and no level of mitigation would make this

proposal appropriate for this setting.

While I support the transition to renewable energy, this proposal raises serious concerns across environmental, cultural, social, and economic domains. The scale, siting, and cumulative impacts appear disproportionate and inadequately justified, particularly in a location of such recognised sensitivity and importance.

This objection is not to renewable energy itself, but to development that risks causing irreversible harm while delivering limited or unclear local benefit.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

There are concerns that the Environmental Impact Assessment (EIA) does not fully capture the scale and complexity of the proposed development.

Key issues include:

Insufficient long-term modelling of cumulative ecological impacts.

Limited clarity on sediment disruption, hydrodynamic changes, and downstream environmental effects.

Lack of robust baseline data for marine species populations, particularly cetaceans.

Inadequate assessment of peatland disturbance and associated carbon release.

Given the sensitivity of the environment, a more precautionary and comprehensive assessment is required.

ASSESSMENT OF ALTERNATIVES

The proposal does not appear to meaningfully explore alternative locations, scales, or configurations that could reduce environmental and social harm.

Concerns include:

Lack of transparent comparison with less ecologically sensitive sites.

No clear justification for siting turbines in a known marine-rich corridor.

Absence of smaller-scale or phased development options.

MARINE ECOLOGY AND PROTECTED SPECIES

The west coast of Lewis is recognised as one of the richest marine environments in the UK, supporting whales, dolphins, and other protected species.

Potential impacts include:

Disturbance from underwater noise during construction and operation.

Disruption to migration routes and feeding grounds.

Changes to seabed ecosystems due to turbine foundations and cabling.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development poses risks to seabird populations through:

Collision with turbine blades.

Displacement from feeding and nesting areas.

Disruption of migratory routes.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The Isle of Lewis has a continuous Gaelic cultural presence spanning thousands of years.

Concerns include:

Impact on culturally significant landscapes and sites.

Erosion of community identity and sense of place.

Use of Gaelic language without clear evidence of meaningful local support.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

Potential impacts include:

Noise and light pollution affecting sleep and wellbeing.

Increased stress associated with large-scale industrial development.

Disruption during construction.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The scale of the turbines would dominate the surrounding landscape and seascape.

Concerns include:

Loss of natural character.

Visual intrusion across a wide area.

Lasting alteration of key views.

CONSTRUCTION AND POLLUTION RISKS

Construction risks include:

Peat disturbance and carbon release.

Sediment disruption affecting marine habitats.

Pollution from construction activity.

FISHERIES AND MARINE LIFE

Fishing is a key local industry.

Potential impacts include:

Loss of fishing grounds.

Disruption to fish populations.

Navigational and access restrictions.

ONSHORE INFRASTRUCTURE: HIDDEN IMPACTS

Associated infrastructure may include:

Road development through sensitive areas.

Grid connections and substations.

Long-term landscape change beyond the offshore site.

DARK SKIES AND NOCTURNAL WILDLIFE

Concerns include:

Light pollution affecting wildlife and residents.

Loss of dark sky quality.

TOURISM

Tourism relies on the natural environment.

Risks include:

Reduced landscape appeal.

Economic impact on local businesses.

Conclusion

This proposal raises substantial concerns that have not been adequately addressed. The environmental, cultural, and social impacts appear disproportionate to the benefits.

I strongly object to this development and do not believe it should proceed in this location under any circumstances.

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: 1BE34FD3

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

Dear Sir/Madam

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

A critical review of the Environmental Impact Assessment Report and supporting documentation reveals significant deficiencies. The application lacks an adequate evidential basis for a lawful determination, with essential environmental data absent, baseline information limited and inconsistent, and key aspects of the proposal left undefined. The reliance on a flexible design framework hinders a clear understanding of likely significant effects, and without specified mitigation measures, their effectiveness remains unassessed. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidential support.

Furthermore, the proposal exhibits clear and substantive policy conflicts. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts are directly relevant to the statutory tests needed for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises serious concerns, particularly with large turbines positioned in close proximity to the shoreline, leading to significant implications for landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a comprehensive, transparent, or reliable assessment of the likely environmental effects associated with the proposal. The reliance on a flexible Project Design Envelope, which

lacks commitment to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This approach hinders the consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the final development, thus preventing both the public and the competent authority from grasping the actual extent of environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be addressed subsequently impedes any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly defined before determination.

There are also notable evidential deficiencies, such as gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, particularly where findings of negligible or non-significant effects are asserted without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal falls short of demonstrating compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation measures, and existing gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and rigorous assessment of environmental effects, meaning that the competent authority is not positioned to make a determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The Environmental Impact Assessment regime requires a thorough assessment of alternatives, which is notably absent in this application. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the application merely recounts the project's evolution. This narrative fails to show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is a complete lack of transparent or evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has adequately explored the option of positioning turbines further offshore, an approach that could potentially mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, as well as the critical role that proximity to the shore plays in determining impact, the omission of such analysis means that it cannot be concluded that the proposed siting is the least damaging option.

The inadequacies also extend to the assessment of cable routing and landfall. There is insufficient evidence demonstrating that alternative routes have been thoroughly investigated to avoid or minimise impacts on sensitive receptors, which include culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the design did not incorporate mitigation by design, instead relying on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, ultimately hindering the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives available. The absence of a robust alternatives assessment leads to the conclusion that the proposal does not embody 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 areas, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment is a significant omission that contributes to the overall determination that the application has not been sufficiently evaluated and thus cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species lacks comprehensiveness and reliability within the West Lewis coastal environment. This region is known for its biological activity and sensitivity, yet the methodologies employed are inadequate in capturing essential aspects such as species presence, behaviour, and habitat use. Consequently, the baseline data is incomplete, failing to provide a solid foundation for assessing potential impacts.

One significant oversight is the failure to properly evaluate otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge their usage of coastal areas for foraging and movement. As a result, the assessment overlooks the core foraging range and behavioural patterns of otters, leaving the potential effects of construction disturbance, noise, and increased activity inadequately addressed. This gap in analysis undermines the conclusions regarding the

absence of significant effects on this species.

In addition, the assessment of basking sharks is compromised by an overreliance on aerial surveys, which introduces considerable detection bias, especially in Atlantic conditions. This methodological choice is likely to result in an underestimation of their presence, particularly when compared to established land-based observations that indicate a frequent occurrence in these waters. The failure to include or adequately consider such critical data further weakens the reliability of the conclusions drawn.

The methodological shortcomings mean that claims of negligible or non-significant effects are based more on assumptions than on rigorous evidence. The lack of sufficient baseline data also hinders the ability to assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the understanding of the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not appropriately identified or assessed protected species. The level of uncertainty introduced prohibits the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, granting consent would not be legally justified.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions culminates in an assessment that lacks reliability. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and affirm that the application does not rest on a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, lacking adequate evidence and containing significant internal contradictions that compromise its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing declines. However, the application does not provide the necessary evidential assurance that these species will remain unaffected. The development is situated within crucial foraging areas and migratory routes, yet the implications of displacement, collision risk, and habitat loss have not been thoroughly assessed.

A critical inconsistency arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation. Such a case is only warranted when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that the conclusions reached are not adequately supported by the available evidence. Furthermore, the assessment fails to adequately demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain

unharmful. The significance of these feeding areas is not fully acknowledged, and reliance on modelling approaches introduces uncertainties, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially given the limitations of baseline data and the incomplete understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional, significant risk by effectively creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of ongoing mortality within this corridor, nor does it consider the potential effects on species that have 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 conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the threshold of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful determination in favour of consent. The identified deficiencies also signify a non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be negatively impacted places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These flaws impede a thorough evaluation of potential impacts and lead to the conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A significant oversight is the inadequate treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they serve as active sites of burial and spiritual practice. The assessment overlooks their ongoing use and significance, leading to a distorted understanding of the cultural effects and ignoring their importance in community life.

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

of the development's cultural impact.

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

Additionally, the absence of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018, represents a critical procedural failure. This omission prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings conflict with the requirements of the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the dismissal of living cultural practices, marks a significant deviation from policy mandates.

Collectively, the failure to evaluate living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a substantial evidential gap. The cultural impacts of the development have not been adequately assessed, resulting in the application lacking a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment conducted by the developer is a critical shortcoming that affects the evaluation of the application. While the developer engaged local residents through focus groups, the full report remains unpublished, leading to a significant evidential gap. This absence hinders both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research.

Evidence suggests that residents are experiencing measurable levels of stress, anxiety, and concern linked to the scale and proximity of the proposed development. These findings are based on direct engagement and should not be viewed as speculative. However, without access to the complete assessment, the findings cannot be adequately scrutinised, and their significance in the decision-making process is diminished.

Furthermore, the proposal is perceived as a threat to community identity and cohesion, with the developer's findings highlighting concerns over "cultural loss." These social impacts have not been sufficiently acknowledged in the main application and have not been assigned the appropriate weight. The failure to disclose the full Social Impact

Assessment obscures the true human and social costs of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. The absence of the complete dataset leads to an incomplete evidential basis for balancing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. It is required that developments promote positive health outcomes and avoid causing harm. However, the evidence currently available points to existing adverse effects that have not been fully disclosed. Thus, without the full assessment, compliance with this policy remains unproven.

The procedural implications of this situation are profound. The competent authority cannot perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission within the application and signifies a failure to meet the evidential standards mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with documented evidence of adverse impacts, renders the evaluation incomplete and unreliable. This situation hampers a lawful determination and reinforces the conclusion that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposed turbines is significantly lacking and does not adequately capture the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. Introducing large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character and lead to a permanent transformation of the landscape.

Moreover, the application fails to represent the true magnitude of the visual changes. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thus directly impacting visual amenity and undermining the naturalness and sense of remoteness that define the area. The assessment does not sufficiently communicate this level of impact or its significance within such a sensitive landscape context.

Concerns also arise regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not accurately depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the

visual impact has been understated, compromising the reliability of the assessment.

Additionally, there is a failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the preservation of natural spaces and historic assets. The proposed changes are incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal for substantial seabed preparation and installation works within the high-energy Atlantic environment raises significant concerns due to the incomplete assessment of construction and pollution risks. The absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans means that there is insufficient detail to evaluate the likely environmental effects. Instead, the application relies on unspecified mitigation and contingency measures that are to be prepared post-consent. This approach not only hinders the meaningful assessment of their adequacy and effectiveness but also introduces uncertainty regarding the protection of the sensitive receiving environment.

The West Lewis coastline is known for its clean coastal waters and important habitats, which are at risk of sediment disturbance and contamination. Although the application does acknowledge risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide adequate information on how these risks will be prevented,

controlled, or monitored. Additionally, there is a lack of clarity about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these potential disturbances. This lack of information also extends to marine species and habitats identified as sensitive in the wider assessment.

Moreover, the failure to include detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent is granted, the application undermines the ability to assess whether appropriate safeguards will be in place to address pollution events. This procedural risk complicates the competent authority's ability to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and necessary mitigation should be evaluated prior to consent; without this information, a lawful determination is not feasible. The application also does not demonstrate compliance with policies concerning environmental protection and water quality.

Ultimately, the deficiencies in defined mitigation measures, detailed management plans, and uncertainties about potential impacts render the assessment materially inadequate. These issues prevent a thorough evaluation of construction and pollution risks and highlight that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

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

A critical concern is the assumption made within the application regarding the displacement of fishing activity, which is presented as a feasible option without acknowledging potential consequences. There is no evidence provided to support the availability, accessibility, or capacity of alternative fishing grounds to accommodate any increased pressure. This significant omission raises concerns about overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Consequently, without a clear and evidence-based assessment, the impacts on fisheries and the livelihoods they support remain poorly understood.

Furthermore, the proposal introduces considerable risks to marine species, especially from the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended period is likely to cause disturbances over

large distances, potentially affecting species such as dolphins. The forecasted disturbance to a substantial portion of the local bottlenose dolphin population is particularly alarming; yet, the application minimises the significance of these effects without adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed onshore infrastructure is inadequate and does not fully address the impacts of what constitutes a singular integrated project. The offshore turbines and onshore activities are interconnected, yet they are evaluated independently, leading to a disjointed assessment that fails to reveal the comprehensive scale of environmental and socio-economic consequences.

Significant elements of the onshore works comprise cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access routes through fragile landscapes. These construction activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and is an ecologically sensitive habitat. The application lacks a thorough examination of these impacts, obstructing a complete understanding of the project's overall environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application hinders the accurate evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components be evaluated collectively. However, the

division of offshore and onshore elements prevents a full comprehension of the combined impacts on peatlands, habitats, and local communities.

Additionally, there are significant risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy measures. The application fails to show that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, leading to a clear evidential gap in the context of biodiversity protection.

Concerns also arise regarding the carbon balance implications of the proposal. Disturbance of peatland may release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this concern or prove that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land could lead to conflicts with established land use and legal rights. There is a lack of evidence that the essential consents or processes have been initiated, raising doubts about the project's feasibility and lawful execution.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests stands in opposition to the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further compromises the integrity of the application.

Collectively, the disjunction of project components, the absence of comprehensive assessments, and the lack of substantiation regarding environmental and land use impacts render this section of the application incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. The proposed installation of permanent red aviation lighting would create a continuous and intrusive "wall of light" effect along the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the implications of this lighting for visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the role that dark skies play in the local identity and the potential growth of emerging tourism sectors such as astro-tourism. The lack of consideration for these impacts reveals a notable deficiency in the overall landscape and environmental assessment.

Critically, there has been no evaluation of how these changes might affect nocturnal wildlife. Birds such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and lead to increased collision risks. The proposal does not include any lighting impact assessment or phototaxis study, meaning it fails to determine the possible effects of aviation lighting on these species and any resulting increase in mortality.

The situation is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not take into account nocturnal activities or the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential danger has not been evaluated. The lack of site-specific night-time data creates a crucial gap in the understanding of ecological impacts.

Without assessing the effects on nocturnal wildlife, it is impossible to ascertain whether protected species or designated sites could be negatively impacted. The evidential standard required to rule out adverse effects with reasonable scientific certainty cannot be achieved, invoking the precautionary principle and hindering a lawful determination.

Additionally, from a policy standpoint, this omission contradicts National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It also diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a fundamental aspect of the overall ecology.

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

TOURISM

The application inadequately assesses the impacts on tourism, which is vital to the economy of the Isle of Lewis. This sector relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application recognises that 86% of visitors are attracted by the scenery, it fails to quantify how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has witnessed substantial growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, representing up to 16% of the island's economy. Nevertheless, the application does not analyse how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without such an analysis, it remains unclear whether the development would yield a net economic

benefit or threaten an established and expanding sector.

Furthermore, the role of environmental quality in bolstering tourism is not addressed. The significance of unspoiled landscapes and dark skies in enhancing visitor experiences and emerging markets, such as nature-based tourism and astro-tourism, is overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the impacts on this recognised and growing segment of the local economy.

The implications of failing to assess tourism impacts extend beyond the sector itself, affecting employment, local businesses, and the sustainability of the community within this island context that has limited economic diversification. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated as required under the Islands (Scotland) Act 2018.

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

In summary, the shortcomings in quantifying tourism impacts, the neglect to assess the environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as defined by statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application, however, is presented within a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps in the evidential basis for the application hinder its determination. The reliance on an undefined design envelope, unspecified mitigation measures, and the failure to address key impact pathways—including effects on nocturnal wildlife, complete onshore infrastructure, and tourism—renders the Environmental Impact Assessment incomplete. Consequently, it does not provide a full understanding of likely significant effects or residual impacts.

Moreover, there are procedural shortcomings present. The failure to conduct a compliant Island Communities Impact Assessment breaches statutory duties under

the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment constitutes a significant omission, preventing the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience. These deficiencies are substantial enough to render the application unfit for determination.

The proposal is also at odds with National Planning Framework 4, failing to safeguard biodiversity, natural landscapes, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, coupled with internal inconsistencies, have not met the evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and hinders the ability to lawfully conclude that the impacts are acceptable.

The proposal is poised to cause substantial and irreversible changes to a highly sensitive landscape. It threatens to industrialise the Atlantic-facing coastline, disrupt dark skies, alter cultural and visual relationships, and negatively impact tourism, resulting in permanent effects that cannot be mitigated satisfactorily.

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

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

Additional Comments

I speak as part of a local group who have come together in opposition to the N4 plans to violate our island home.

The local group who is rallying the movement to object is called Eilean mo Ghaoil – “Isle of My Love.”

That is exactly how I feel, so deeply, in my heart – I am heartbroken at the prospect of this violation of our beloved island and home.

N4 is a human rights issue – a violation against an indigenous

community.

I would like to emphasise that
I am against renewable energy that destroys:

A precious ecosystem and unique habitat - (a Scottish Government scientific report on the west coast of Lewis states that "the Outer Hebrides are probably the richest area of the UK for marine mammals.")

An indigenous culture (The Isle of Lewis is home to one of Europe's oldest continuous Gaelic-speaking communities, with linguistic and cultural roots stretching back over 5,000 years.)

A dark sky sanctuary

Quality of life for the people on this island

The fishing industry and the tourism industry - both of which are a huge part of island culture.

Mental health and well-being for anyone in this area, who will be subject to the constant light and noise damage.

Sacred cultural landmarks and spaces.

We are against an enormously, unthinkably large and destructive development that will add to taxpayer costs and will likely, not even be used...

Solely in order to profit mega corporations based in Canada and Ireland.

The original plans for N4 were pushed through during Covid, when people could not attend the meeting to object, and intentionally pushed forward during a change in leadership in the local council.

I went to a local council meeting and spoke with representatives from the Canadian megacorp, Northland, to verify every detail in this post:

There is NO benefit here for the local community except a cycle path - that will be given after the massive disruption is built through the peatland and its use has finished.

The 60+ wind turbines are planned to be taller than the Empire State Building.

They have a wing span that is larger than a Boeing 747.

The turbines are planned to be planted along the coastline, a coastline that is home to numerous species, and is currently a popular whale path.

They will be used for 35 years: there is no plan to dispose of them after the 35 year period... meaning that these turbines will contribute to an incredibly vast and destructive amount of non-biodegradable TRASH.

Here are few things that are really speaking to me:

A PRECIOUS ECOSYSTEM

Wind Turbines have an incredibly damaging and well-documented impact on birds as well as the seabed and sea life, particularly whales, fish, mammals, and other life forms – through the physical space they take as well as noise and light pollution.

I spoke to a member of the local cetacean society recently: he told me they were so pleased that the cetacean population has grown in such a healthy way, and we are seeing the numbers of humpback whales recovering.

I'm so sad when I think of how this will impact that population.

Wind turbines are horrific for current patterns, sediment patterns, and erosion.

The Wind Power Lab, Global Wind Turbine Experts, said that: "Studies have demonstrated that turbines operating in areas exposed to frequent heavy rainfall and strong winds tend to experience accelerated erosion."

<https://windpowerlab.com/tackling-leading-edge-erosion>

They also change currents and sediment levels. According to Torsten Fischer, Helmholtz Association of German Research Centres,

"In addition, the changes in the flow pattern also have consequences for the accuracy of flow predictions, which are relevant for shipping traffic, for example, but also for disaster management, environmental protection, and fisheries."

<https://phys.org/news/2026-02-offshore-farms-ocean-current-patterns.html>

This does NOT sound like an answer to the climate crisis if you ask me.

The N4 plan requires a massive disruption through an ancient peat bog. When you dig up peat, it releases carbon, and contributes to atmospheric carbon dioxide - intensifying the greenhouse effect and accelerating global warming.

This nullifies any positive impact of renewable energy.

AN INDIGENOUS CULTURE

The Gaelic culture on the Isle of Lewis is an indigenous nation. In a recent poll by Eilean mo Ghaoil, 88% of the community voted against the N4 Wind Turbine development.

As such, N4 is a human rights violation. Scroll down to the end if you have any questions about that.

Northland gave this atrocity of a development a Gaelic name, to make this seem like it is somehow collaborative and welcome to the Hebridean Islanders.

Spiorad na Mara - Spirit of the Sea.

Using the language of a culture to take advantage of that culture - hello, this is the definition of appropriation.

SACRED CULTURAL LANDMARKS

One of the gigantic centres, a key to the plan, is planned to be built ON A GRAVEYARD.

Literally, ON A GRAVEYARD.

You could not make this more disrespectful of this culture if you tried.

And, because of the scale – they are inescapable. They'll dominate the island from The Callanish Stones to the Lighthouse at the Butt of Lewis. We will not be able to escape the sight or impact of these monstrosities anywhere on our island.

TAXPAYER COSTS

The Scottish gridline is already at max capacity.

Right now, Scotland already produces far more wind energy than the grid can carry. The transmission lines from Scotland to England can handle around 6 gigawatts. On a windy day, Scottish wind farms already generate 10. That's 4 gigawatts of clean electricity with literally nowhere to go.

In 2025 alone, that cost £343 million — nearly all of it in northern Scotland. Our region generated wind power that the grid couldn't use, and consumers paid the bill anyway.

Experts say an efficient grid curtails about 5% of its renewable output. We're currently curtailing 30–40% of Scotland's wind.

Right now. Before this giant wind farm has been built.

So what happens? Wind farms get paid to switch off.

Let me repeat that: WIND FARMS GET PAID TO SWITCH OFF.

Who pays this? YOU. ME. YOUR GRANDPARENTS. THE TAXPAYERS.

I am woman who cares deeply about my family's health and safety, which will be negatively impacted by this development (I haven't even really gone into the well-

documented issues of noise and light pollution in this post) – AND:

No, I don't want this in my backyard because this planet is my backyard and I care about it.

I care about the health and wellbeing of my family, the environment, this community, this island, this ecosystem, and this world.

Indigenous land, you say?

What makes an indigenous land... is it a ruling by the conquering country, or is it a way of being?

This is from the United Nations Permanent Forum on Indigenous Issues:

Who are indigenous peoples?

It is estimated that there are more than 370 million indigenous people spread across 70 countries worldwide.

Practicing unique traditions, they retain social, cultural, economic and political characteristics that are distinct from those of the dominant societies in which they live.

Spread across the world from the Arctic to the South Pacific, they are the descendants - according to a common definition - of those who inhabited a country or a geographical region at the time when people of different cultures or ethnic origins arrived.

The new arrivals later became dominant through conquest, occupation, settlement or other means...

Considering the diversity of indigenous peoples, an official definition of “indigenous” has not been adopted by any UN-system body.

Instead the system has developed a modern understanding of this term based on the following:

Self- identification as indigenous peoples at the individual level and accepted by the community as their member.

Historical continuity with pre-colonial and/or pre-settler societies

Strong link to territories and surrounding natural resources

Distinct social, economic or political systems

Distinct language, culture and beliefs

Form non-dominant groups of society

Resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities.

A question of identity

According to the UN the most fruitful approach is to identify, rather than define indigenous peoples. This is based on the fundamental criterion of self-identification as underlined in a number of human rights documents...

Culture and Knowledge Indigenous peoples are the holders of unique languages, knowledge systems and beliefs and possess invaluable knowledge of practices for the sustainable management of natural resources.

They have a special relation to and use of their traditional land.

Their ancestral land has a fundamental importance for their collective physical and cultural survival as peoples.

Indigenous peoples hold their own diverse concepts of development, based on their traditional values, visions, needs and priorities.

Political participation Indigenous peoples often have much in common with other neglected segments of societies, i.e. lack of political representation and participation, economic marginalization and poverty, lack of access to social services and discrimination.

Despite their cultural differences, the diverse indigenous peoples share common problems also related to the protection of their rights.

They strive for recognition of their identities, their ways of life and their right to traditional lands, territories and natural resources.

https://www.un.org/esa/socdev/unpfii/documents/5session_factsheet1.pdf

I have taken on the right to care about indigenous issues when I was A.) born as a human being and B.) made my home in an indigenous culture.

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: 72A1DDA1

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment. The objection arises from an examination of the Environmental Impact Assessment Report and other relevant documents, revealing serious deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. There are fundamental issues regarding the scale, design, and proximity of the proposal in relation to statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential foundation for a lawful decision. There is a lack of critical environmental data, limited and inconsistent baseline information, and many aspects of the proposal remain undefined. The flexible design framework complicates the assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures prevents an evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially regarding biodiversity, natural areas, cultural heritage, and public health. It does not prove that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts challenge the statutory tests necessary for consent and hinder the competent authority's ability to determine if the development aligns with policy requirements.

The proposal's scale is unprecedented for this area, with large turbines located near the shoreline, raising substantial concerns about landscape capacity, visual impact, and environmental repercussions. In light of the insufficient information, reliance on unclear mitigation strategies, evidential shortcomings, and clear policy non-compliance, it is apparent that the application is incomplete and does not support a lawful decision. Therefore, the precautionary principle should be applied in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents numerous deficiencies that render it unreliable and incomplete. It heavily relies on undefined mitigation measures, monitoring strategies, and management plans that have not yet been articulated. This

approach seeks consent based on the premise that environmental harms will be managed in the future, thus obstructing any meaningful evaluation of the effectiveness of these measures or a proper assessment of residual impacts. Deferring critical information to the post-consent stage is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment regime, which mandates the clear establishment of significant effects and their mitigation before any determination is made.

Additionally, there are considerable gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty regarding the scale and significance of impacts, especially when claims of negligible or non-significant effects are not backed by robust data. The lack of sufficient information hampers a comprehensive understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty incompatible with statutory obligations.

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

The reliance on a flexible Project Design Envelope, devoid of specific turbine dimensions, layouts, or configurations, fosters significant uncertainty that hinders a consistent application of a worst-case scenario. Such a lack of commitment undermines the integrity of the assessment, meaning that the impacts presented may not truly represent the development ultimately constructed. Consequently, the competent authority and the public are left without a clear understanding of the actual environmental effects, which further complicates the decision-making process.

ASSESSMENT OF ALTERNATIVES

The inadequacy in the assessment of alternatives significantly undermines the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of viable alternatives based on environmental effects, the application provides a narrative of project evolution that fails to demonstrate that less harmful options have been properly identified and assessed in favour of more damaging solutions.

There is a notable absence of transparent or evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. The application does not establish that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. Considering the sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in assessing impact, the lack of such an analysis hampers any conclusion that the proposed siting represents the least

damaging option.

Deficiencies are also apparent in the cable routing and landfall assessment. There is inadequate evidence suggesting that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The lack of a clear avoidance strategy, combined with the absence of comparative analysis, indicates that mitigation by design has not been applied, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, obstructing the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is not possible to conclude that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, this deficiency jeopardises compliance with National Planning Framework 4, particularly concerning the safeguarding of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission that contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is materially deficient, failing to provide a complete and reliable understanding of ecological receptors. The baseline data is incomplete, and the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, there is no sound evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, a European Protected Species. The application neglects to properly recognise and assess their active use of coastal areas for foraging and movement. This 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 sufficiently evaluated. Such omissions undermine any claims regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks suffers from significant deficiencies. The reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions, which is likely to lead to an underestimation of their presence. This contrasts sharply with established land-based observations indicating frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamental contradiction by asserting that there will be no significant adverse effects, while simultaneously making a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the ornithological assessment, suggesting that the conclusions reached are not backed by adequate evidence. The assessment contains significant gaps and internal inconsistencies that undermine its validity.

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to provide sufficient evidence demonstrating that these species will not be adversely affected. Key foraging areas and migratory pathways are present in the development site, yet the assessment does not effectively evaluate the potential consequences of displacement, collision risk, or habitat loss for these birds.

The methodologies used in the assessment are likely to underestimate mortality rates, particularly for species in severe decline, such as Kittiwakes and Fulmars. There is a significant reliance on modelling approaches, which introduces uncertainty regarding the true impact on seabirds associated with protected sites, including the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully accounted for, raising further concerns about the adequacy of the analysis.

Additionally, the positioning of turbines within a recognised migratory corridor poses an increased risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of potential sustained mortality within this corridor or the effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to 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, along with the gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation activates the precautionary principle, which precludes a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies demonstrate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

In summary, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These flaws prevent a comprehensive evaluation of impacts and contribute to the overarching conclusion that the application does not satisfy the statutory requirements necessary for its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment associated with this application is fundamentally flawed, particularly in its treatment of the West Lewis coastline, which must be recognised as a vibrant cultural landscape intertwined with environment, language, tradition, and community. Rather than appreciating heritage as a dynamic part of community life, the application reduces it to a collection of isolated, static features. This inadequate approach overlooks the ongoing social, cultural, and spiritual significance of these heritage elements.

Significantly, the evaluation of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, is deeply concerning. These sites serve as active locations for burial and spiritual practices, yet the assessment treats them as mere static features, neglecting their continued relevance and the implications of development on their settings. This mischaracterisation results in a flawed understanding of cultural effects and ignores their vital role in community existence.

Moreover, the assessment fails to acknowledge intangible aspects of cultural heritage, including the Gaelic language and local traditions, as well as the enduring relationship between the community and the coastal environment. These factors are crucial to the area's identity but are entirely omitted from the evaluation, which severely limits the understanding of the development's cultural impact.

There are also serious issues regarding community rights and engagement. The Gaelic-speaking population, which holds a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and contradicts established principles that prioritise participation in decisions affecting

cultural and environmental matters.

A significant procedural lapse is the failure to conduct a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. Without this necessary assessment, the responsible authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone raises concerns about the lawfulness of the determination.

From a policy standpoint, these issues create direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of historic sites and cultural places. The disregard for both tangible and intangible heritage, coupled with the failure to acknowledge living cultural practices, signifies a clear violation of policy standards.

Ultimately, the collective deficiencies in assessing living heritage, intangible cultural significance, community rights, and adherence to statutory requirements lead to a substantial evidential gap. The cultural repercussions of the proposed development remain unexamined, and the application fails to furnish an adequate foundation for gauging the true cultural cost associated with this proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, remains unpublished in its entirety. This lack of transparency signifies a considerable evidential gap, impeding both public and competent authority understanding of the social risks identified through the developer's own investigation.

Available summaries reveal that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore factual rather than speculative. However, the withholding of the complete assessment limits proper scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet, these social impacts have not been adequately incorporated into the main application or given the necessary weight. The lack of access to the full Social Impact Assessment obscures the true human and social cost associated with the development.

This absence of transparency fundamentally undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functionality may be compromised. The failure to provide the complete dataset means that the application does not offer a comprehensive evidential basis for weighing the benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the available evidence indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy cannot be established.

The procedural consequences are considerable. The competent authority cannot perform a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant omission within the application and indicates a failure to fulfil the evidential requirements outlined in the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, in conjunction with evidence of existing adverse effects, renders the assessment insufficient and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks adequate information to support it.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not properly represent the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would establish a continuous industrial presence, significantly altering this character and leading to a permanent and irreversible change in the landscape.

There is also a lack of clarity in the application regarding the magnitude of the visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the extent of this impact or its importance within such a sensitive landscape.

Methodological issues arise from the selection and presentation of visual viewpoints. It appears that the viewpoints may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This may lead to an understatement of the visual impact, which questions the reliability of the assessment.

Moreover, the assessment does not consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting, linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment overlooks their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and their connection to the natural horizon. This change is not merely a visual impact; it represents a broader cultural and spatial harm that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which seeks to protect natural areas and historic assets. The proposed scale of change is at odds with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes the argument for policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resulting changes are fundamental and permanent, rather than something that can be lessened to an acceptable degree through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal 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 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 raises significant concerns regarding carbon balance, particularly due to the disturbance of peatland, which releases stored carbon and may create a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains advantageous.

Infrastructure routing through active croft land introduces potential conflicts with established land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which casts doubt on the feasibility and legality of implementation.

A comprehensive assessment of onshore infrastructure is lacking, leading to an incomplete understanding of the impacts stemming from what is essentially a singular integrated project. Onshore works, which encompass cabling across protected moorland, the construction of a substation near Stornoway, and the requisite access infrastructure through sensitive landscapes, are not considered alongside offshore turbines. This disjointed approach obscures the true extent of the environmental and socio-economic consequences.

By not adequately 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 holistically; however, the separation of offshore and onshore elements limits the understanding of combined impacts on peatlands, habitats, and local communities.

There are also considerable risks to sensitive habitats, such as machair systems and peatland environments, which enjoy 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 leaves a significant evidential gap regarding biodiversity protection.

From a policy standpoint, the failure to evaluate the project comprehensively and ensure 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 weakens the application.

In summary, the fragmentation of project components, the absence of thorough 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 absence of an assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant evidential gap. The West Lewis coastline is noted for its exceptionally dark skies, which are essential to the region's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting, which would be visible over considerable distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly notable given the significance of dark skies to the area's identity and the growth of tourism sectors, such as astro-tourism. The neglect of these impacts represents a shortfall in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and heightened collision risks. The application does not include any lighting impact assessment or phototaxis study, thereby failing to assess the potential effects of aviation lighting on these species and the risk of increased mortality.

This deficiency is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or related risks. Other species, such as Kittiwakes, which may forage or migrate at night, are similarly vulnerable to disorientation due to artificial lighting, yet this risk has not been addressed. The lack of site-specific night-time data creates a substantial gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it remains impossible to

ascertain whether protected species or designated sites would be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is a crucial aspect of the overall setting.

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife signifies a major evidential deficiency. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to facilitate a lawful determination.

TOURISM

The assessment of tourism impacts is fundamentally inadequate and neglects to address the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and sense of remoteness. The application itself notes that 86% of visitors are attracted by the scenery, yet fails to provide a quantified evaluation of how extensive offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

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

The assessment further overlooks the critical role of environmental quality in supporting tourism, including the value of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant void in understanding the impacts on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not illustrate compliance with National

Planning Framework 4, particularly regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Collectively, the failure to quantify tourism impacts, assess environmental factors affecting visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is a significant misalignment with the principles of sustainable development as required by statutory obligations, national policy, and evidential standards. This application mirrors the key issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being put forward under an enhanced policy framework that prioritises biodiversity, peatland conservation, landscape preservation, and the wellbeing of communities, the application falls short in critical areas.

A reliable and complete evidential basis for decision-making is lacking. There are notable gaps in baseline data, and the continued reliance on an undefined design envelope poses additional concerns. Furthermore, it depends on unspecified mitigation measures and fails to consider important impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a thorough understanding of likely significant effects and residual impacts.

In addition to these substantive issues, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the lack of a comprehensive Social Impact Assessment represents a material omission that hinders a proper evaluation of impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies are significant enough to deem the application unsuitable for determination.

The proposal also stands in opposition to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. The proposal fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, notably due to the absence of tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been sufficiently assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially

serious. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and making it impossible to lawfully conclude that the impacts are acceptable.

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

Overall, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, alongside policy conflicts and unresolved environmental risks, precludes a lawful, evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to compel the submission of the necessary missing information.

In light of these considerations, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 9CDF151E

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report suffers from significant deficiencies, leading to an incomplete and unreliable understanding of the potential environmental effects associated with the proposal. The flexibility of the Project Design Envelope, which lacks commitment to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of specificity hinders the application of a worst-case scenario, thereby compromising the assessment's integrity and preventing both the public and competent authorities from fully grasping the true extent of the environmental impacts.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be mitigated later obstructs any meaningful evaluation of effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally inappropriate and conflicts with the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies be clearly identified before determination.

The report also exhibits severe evidential shortcomings, including gaps in 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 impacts, especially where negligible or non-significant conclusions are drawn without robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not fulfil the evidential criteria set out in the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not align with the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been demonstrated that impacts have been adequately assessed or that suitable safeguards are established.

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

ASSESSMENT OF ALTERNATIVES

The application's assessment of alternatives is fundamentally inadequate, failing to meet the statutory requirements set out by the Environmental Impact Assessment

regime. Instead of providing a structured comparison of realistic alternatives based on their environmental impacts, it offers a narrative of project evolution that does not effectively demonstrate that less harmful options have been thoroughly identified and evaluated in preference to more damaging ones.

There is no transparent, evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Crucially, the developer has not shown that they have seriously considered placing the turbines further offshore, where the potential for visual, ecological, and coastal impacts could be mitigated. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact highlight the importance of this analysis. The absence of such consideration undermines any conclusion that the proposed siting is the least damaging option available.

This lack of thoroughness also extends to the evaluation of cable routing and landfall, with insufficient evidence indicating that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors. Notably, this includes areas of cultural and spiritual significance, such as Barvas Cemetery. The failure to present a clear avoidance strategy or comparative analysis implies that the application has not employed mitigation by design, instead relying on measures intended to address impacts only after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This oversight reflects a disregard for the established mitigation hierarchy, preventing the competent authority from assessing whether less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal aligns with principles of sustainability or complies with relevant policies.

From a policy standpoint, these deficiencies compromise adherence to National Planning Framework 4, particularly in terms of safeguarding natural places, cultural heritage, and community wellbeing. The absence of a structured, comparative assessment constitutes a significant omission, contributing to the overall conclusion that the application has not undergone adequate scrutiny and cannot legally support a determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly inadequate, failing to offer a complete or reliable understanding of the ecological receptors present. This area is characterised as a biologically active and highly sensitive marine system, yet the baseline data collected is insufficient, and the methodologies employed do not effectively capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal zones for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an incomplete assessment of the possible effects of construction disturbance, noise, and heightened activity, thereby undermining any conclusions that suggest no significant effects on this species.

In addition, the evaluation of basking sharks is flawed, as it relies on aerial surveys that introduce significant detection bias, especially under Atlantic weather conditions. This methodology is prone to underestimating the presence of basking sharks, particularly when compared to established land-based observations that indicate their frequent usage of these waters. The neglect to incorporate or appropriately consider such data results in an incomplete baseline, further diminishing the reliability of the conclusions drawn.

The methodological shortcomings lead to conclusions regarding negligible or non-significant effects that rest on assumptions rather than substantial evidence. The lack of adequate baseline data also obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty concerning the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or those of National Planning Framework 4, as there has been insufficient identification or evaluation of protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus necessitating the precautionary principle. Under these conditions, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal presents serious flaws that critically undermine its conclusions. It is evident that the west coast of the Isle of Lewis is home to seabird populations of international significance, many of which are already experiencing decline. However, the application does not meet the necessary evidential standard to ensure that these species will not suffer adverse effects. The placement of the turbines within key foraging areas and migratory routes has not been thoroughly examined in relation to the risks of displacement, collision, or habitat loss.

A glaring contradiction is apparent in the application. The developer asserts that there will be no significant adverse effects, yet simultaneously presents a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated.

This inconsistency raises doubts about the credibility of the assessment and suggests that the conclusions drawn lack appropriate evidential backing.

Moreover, the assessment fails to provide sufficient evidence that seabird species linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is inadequately acknowledged, and the reliance on modelling techniques introduces considerable uncertainty. This is particularly concerning for species that are already in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to understate mortality rates, especially where baseline data is lacking and behavioural responses have not been fully accounted for.

The location of turbines along a recognised migratory corridor poses a further significant risk, as it creates an obstruction in a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate 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 meet the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, in conjunction with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation 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 convincingly demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal contradictions, methodological flaws, and a lack of compelling evidence. These weaknesses inhibit a thorough evaluation of the potential impacts and lead to the overall conclusion that the application does not satisfy the statutory criteria essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is fundamentally flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape. The intrinsic connections between environment, language, tradition, and community are overlooked, leading to a reductionist portrayal of heritage as a collection of isolated, static assets. This approach fails to acknowledge the ongoing social, cultural, and spiritual functions that these elements serve within the community.

The assessment inadequately treats culturally significant sites such as the cemeteries

at Dalmore, Bragar, and Barvas. These locations are active burial grounds and places of spiritual significance, yet they are mischaracterised as static features devoid of their continued relevance and the potential impacts of development on their surroundings. This lack of understanding leads to an incomplete evaluation of cultural effects and ignores the cemeteries' vital role in community life.

Intangible cultural heritage, including the Gaelic language, local traditions, and the deep-rooted relationship between the community and its coastal environment, is also neglected in the assessment. These aspects are central to the identity of the area, yet their omission signifies a serious gap in understanding the cultural ramifications of the proposed development.

Moreover, there are significant issues regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity akin to that of Indigenous Peoples, yet the process of Free, Prior and Informed Consent has not been implemented. This lack of meaningful engagement raises serious concerns about the legitimacy of the assessment and fails to adhere to established participatory principles regarding decisions that affect cultural and environmental interests.

A critical procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is essential for the competent authority to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. The absence of this assessment alone renders the determination unlawful.

From a policy standpoint, the application's deficiencies stand in stark contrast to National Planning Framework 4, particularly regarding the protection of historic assets and sites. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, signifies a blatant departure from policy requirements.

In summary, the combined failures to assess living heritage, intangible cultural value, community rights, and adherence to statutory obligations culminate in a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application does not provide a reliable foundation for understanding the true cultural costs associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding its social impacts, health, and wellbeing, as the evaluation provided is materially deficient and lacks the necessary transparency for a lawful assessment. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of the social risks identified in the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by available summaries. These impacts arise from direct engagement with the community and are therefore not speculative. However, without access to the complete assessment, proper scrutiny of these findings is unattainable, limiting the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with references to “cultural loss” emerging from the developer’s findings. Unfortunately, these critical impacts have not been adequately considered in the main application, nor have they been given the appropriate weight they deserve. The failure to disclose the entire Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning may be at stake. The absence of the complete dataset means that the application does not present a thorough evidential basis to assess the balance of benefits and harm.

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

The procedural implications of this situation are considerable. The competent authority is unable to carry out a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This inadequacy obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts 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 presents significant deficiencies in its assessment of construction and pollution risks, which ultimately hampers the ability to thoroughly evaluate potential environmental effects. While the project entails substantial seabed preparation and installation activities in a challenging high-energy Atlantic environment, it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on vague mitigation and contingency measures that are to be developed only after consent is granted, obstructing any meaningful assessment of their adequacy and effectiveness.

This reliance on undefined future strategies raises serious concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. Although the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate information on how these issues will be prevented, controlled, or monitored effectively.

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

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application undermines the evaluation of whether suitable safeguards are in place to handle pollution events. This creates procedural risk and inhibits the competent authority from assessing the necessary environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards directly conflicts with the mandates of the Environmental Impact Assessment regime. It is crucial to assess likely significant effects and mitigation measures prior to granting consent, and the absence of this information precludes a lawful determination. Additionally, the application does not adequately demonstrate compliance with relevant policy requirements pertaining to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application does not provide a robust evaluation

of ecological or socio-economic impacts, failing to demonstrate that these crucial uses and habitats can be protected or maintained without significant disruption. A critical concern is the erroneous assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of supporting additional pressure, which is a significant omission. This lack of clarity risks not only overfishing elsewhere but also threatens the economic stability of the local fleet.

Moreover, the proposal presents substantial risks to marine species, particularly due to the underwater noise generated during construction activities. High-energy hammer piling for extended periods is expected to disturb marine life over large distances, notably affecting species such as dolphins. The anticipated disturbance to a significant proportion of the local bottlenose dolphin population is alarming, yet the application downplays these impacts without adequate supporting evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously describes the anticipated impacts as negligible. This contradiction raises serious concerns regarding compliance with the Habitats Regulations, particularly since harm is anticipated to a degree that requires legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance 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 that it can avoid unacceptable impacts on marine biodiversity. This lack of compliance prevents any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant constraints and sensitivities related to onshore infrastructure, which remains materially incomplete. It fails to consider the full extent of impacts resulting from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically linked; however, they are assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

Descriptive details reveal that the onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of associated access infrastructure that traverses sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, thereby preventing an accurate understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application obstructs a thorough evaluation of cumulative effects. The Environmental Impact Assessment process requires that all elements of a project be considered collectively, yet the separation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are considerable risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not demonstrate that the impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been implemented, thus creating an evidential gap in relation to biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland releases stored carbon, potentially creating a carbon debt that undermines the objectives of renewable energy development. The application fails to adequately address this critical issue or to demonstrate that the overall carbon balance remains beneficial.

Moreover, routing the infrastructure through active croft land introduces the risk of conflicts with existing land use and legal rights. There is no evidence presented that the necessary consents or processes have been initiated, raising serious questions regarding 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 at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the application.

In conclusion, 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, which prevents a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in shaping environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting that is visible over long distances would create a continuous and intrusive "wall of light" effect across the

western horizon, fundamentally altering the night-time environment. The application does not assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, representing a significant omission given the importance of dark skies to the area's identity and the growing sector of astro-tourism.

Equally concerning is the complete lack of evaluation regarding the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, as phototaxis can result in disorientation and a heightened risk of collision. The absence of any lighting impact assessment or phototaxis study fails to evaluate how this aviation lighting could adversely affect these species or lead to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, also face vulnerability from artificial lighting, yet this risk has not been addressed. Without site-specific night-time data, a critical gap in understanding ecological impacts remains.

The failure to assess nocturnal impacts makes it impossible to determine whether protected species or designated sites could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which aims to protect natural places and ensure environmental quality. Furthermore, it diminishes the overall assessment of landscape and seascape impacts, as night-time character is an essential component of the environment.

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

TOURISM

The evaluation of tourism impacts within the application is fundamentally flawed, lacking a comprehensive analysis of the economic and social ramifications for a vital segment of the Isle of Lewis's economy. Tourism thrives on the region's wild coastline, its largely untouched landscapes, dark skies, and an overarching sense of remoteness. Despite acknowledging that 86% of visitors are attracted by the scenery, the application fails to provide any quantifiable assessment regarding how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contributions of tourism.

The growth of tourism has been remarkable, escalating from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the

island's economy. Nevertheless, the proposal does not simulate how the potential industrialisation of the seascape and the degradation of environmental quality might affect Tourism Gross Value Added or the broader economic resilience. The lack of such crucial analysis renders it impossible to ascertain whether the development would produce a net economic benefit or threaten an established and expanding sector.

Furthermore, the assessment neglects to acknowledge the significance of environmental quality in fostering tourism, particularly the role of unspoiled landscapes and dark skies in shaping visitor experiences and in burgeoning markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, creating a notable void in understanding the impacts on a vital and expanding aspect of the local economy.

In an island community characterised by limited economic diversification, the oversight in assessing tourism impacts carries broader consequences for employment, local enterprises, and community sustainability. The absence of a proper 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 demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It contradicts strategic objectives that designate tourism as a priority growth sector and falls short of supplying sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, these deficiencies in quantifying tourism impacts, evaluating the environmental factors influencing visitor behaviour, and recognising the island's economic dependence culminate in a substantial evidential gap. This gap obstructs a thorough assessment of the economic effects and supports the conclusion that the application is inadequate.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings in meeting the essential criteria for sustainable development, as established by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was a central concern. This current application, however, is being assessed within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical analysis reveals that the application lacks a complete and reliable evidential foundation necessary for a thorough determination. Notable gaps exist in the baseline data, and there is continued reliance on an unspecified design envelope, alongside mitigation measures that have yet to be clearly defined. Furthermore, it neglects to address key impact pathways related to nocturnal wildlife, the full extent of onshore

infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Moreover, the process has encountered clear procedural failings. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is fundamentally misaligned. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Additionally, it fails to prove that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, primarily due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components is insufficient, leaving the effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents any lawful conclusion that the impacts can be deemed acceptable.

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

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

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

Additional Comments

As a islander this development has zero benefit whatsoever to anyone or anything on the island, Tesco may sell more food for 4 years during construction but then nothing,

tourism exists because people come to see a vision of old vast open spaces.

I am unable to understand why something is allowed to be constructed when there is no requirement or benefit to the area, community not even the island or the country of Scotland, it's for export over the border and out of the uk.

Producers should be producing where it's required end off.

My 103 father calls it rape of nature, he will still be paying full forever increasing cost for all this FREE energy while the energy companies profit soar and the island is just a spreadsheet bottom line

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: D04C35A7

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and its supporting materials reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's scale, proximity to the shoreline, and design, all of which question its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. There is a critical absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Several key aspects of the proposal are undefined, and the flexible design framework used hinders a comprehensive understanding of the potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation fails to provide a complete and informed overview of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack solid evidence.

The proposal faces clear and substantial policy conflicts. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and hinder the competent authority's capacity to deem the development acceptable from a policy standpoint.

Given the unprecedented scale of the proposal in this location, with large turbines situated close to the shoreline, there are significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously flawed, neglecting the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow perspective, viewing heritage merely as a collection of disconnected, static entities instead of recognising their ongoing social, cultural, and spiritual relevance to the community.

The assessment significantly underrepresents culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which remain active sites for burial and spiritual practices. Instead of acknowledging their ongoing use and significance, the assessment inaccurately categorises them as static features, overlooking how development may impact their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural repercussions and fails to appreciate their importance in community life.

Additionally, there is a striking omission in addressing intangible cultural heritage, which encompasses the Gaelic language, traditional practices, and the long-standing bond between the community and the coastal environment. These aspects are vital to the area's identity yet are entirely absent from the evaluation, representing a major oversight. Without incorporating these factors, the development's cultural impacts cannot be adequately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as having a distinct cultural identity akin to Indigenous Peoples, has not been involved in a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and disregards established principles for participation in decisions affecting cultural and environmental matters.

A significant procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligations to assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings put the proposal in clear opposition to National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices demonstrates a clear deviation from established policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and compliance with statutory requirements results in a significant gap in evidence. The cultural impacts of the proposed development have not been thoroughly assessed, and the application lacks a sufficient foundation for determining the genuine cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is significantly inadequate and does not reflect the true scale of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines positioned near the shoreline would introduce a continuous and dominant industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

The application fails to represent the full extent of this visual change. The turbines' scale and proximity would dominate views from residential areas, historic sites, and frequently visited coastal locations, thereby directly impacting visual amenity and diminishing the defining qualities of naturalness and remoteness. Furthermore, the assessment does not adequately convey the significance of this level of impact in the context of such a sensitive landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. There is evidence to suggest that these viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the risk of understating the magnitude of visual impact and questions the reliability of the assessment.

Moreover, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a wider landscape setting, interconnected by visual and spatial relationships to the Atlantic horizon. Treating these as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly conflicts with the National Planning Framework 4 concerning the protection of natural environments and historic assets. The extent of change proposed is at odds with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further challenges any assertion of compliance with policy.

Ultimately, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than capable of being reduced to an acceptable level through any means of mitigation.

In conclusion, the assessment is deficient in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings prevent a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The concerns surrounding the proposal stem from an incomplete assessment of construction and pollution risks, which fails to provide the necessary detail to evaluate potential environmental impacts. The project entails significant seabed preparation and installation activities in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be established after consent, which prevents any meaningful assessment of their potential adequacy or effectiveness.

This reliance on undefined future measures is especially alarming given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and important habitats vulnerable to sediment disruption and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not furnish adequate detail on the prevention, control, or monitoring of these threats.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether appropriate measures are in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the determination stage.

Regulatory requirements highlight that the deferral of essential environmental safeguards contradicts the Environmental Impact Assessment regime. It is crucial that likely significant effects and mitigation strategies be assessed before consent is granted, and the absence of such information renders a lawful determination unattainable. Furthermore, the application does not demonstrate compliance with policy stipulations pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These deficiencies hinder a robust evaluation of

construction and pollution risks and reinforce the conclusion that the application is incomplete.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a critical gap within the Environmental Impact Assessment. The coastline of West Lewis is renowned for its exceptionally dark skies, which are essential for environmental quality, cultural identity, and tourism, particularly in relation to the growing sector of astro-tourism. The proposal introduces permanent red aviation lighting that would be visible over vast distances, creating an intrusive “wall of light” across the western horizon and fundamentally changing the night-time environment.

Moreover, the application fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the identity of the area. The lack of consideration for these impacts leads to a considerable gap in the overall assessment of the landscape and environment.

More alarmingly, there is no examination of how the proposed lighting will affect nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic behaviour, which can cause disorientation and increase the risk of collisions. The application lacks any lighting impact assessment or phototaxis study, resulting in a failure to evaluate how the aviation lighting might impact these species or contribute to increased mortality rates.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has not been addressed. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites could be adversely impacted. The necessary evidential standard needed to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thus invoking the precautionary principle and hindering lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4 concerning the protection of natural spaces and the maintenance of environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the natural setting.

In summary, the failure to assess dark skies and nocturnal wildlife leads to a significant evidential deficiency. The lack of baseline data, impact modelling, and species-specific

analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The application fails to adequately assess the impacts on tourism, a key sector for the Isle of Lewis economy, and does not evaluate the economic and social consequences associated with this area. Tourism in the region relies heavily on its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it provides no quantified assessment of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not model the potential impacts of the industrialisation of the seascape and the resultant loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the island. The lack of such analysis hinders the ability to ascertain whether the proposed development would yield a net economic benefit or harm this vital and expanding sector.

Furthermore, the assessment neglects the significant role of environmental quality in underpinning tourism, including the critical nature of unspoiled landscapes and dark skies for visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment only exacerbates this inadequacy, creating a considerable gap in understanding the impacts on this recognised and growing part of the local economy.

In an island community that faces limited economic diversification, the oversight regarding tourism impacts raises broader concerns for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means 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 compliance with National Planning Framework 4, particularly concerning economic impacts and the necessity to exhibit net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to effectively assess the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency leads to a significant evidential gap. This shortcoming prevents a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards for sustainable development as mandated by statutory duties, national policy, and evidential benchmarks. This application mirrors the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was noted. It is now being presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential foundation necessary for a proper determination is incomplete and unreliable. Notable gaps exist in the baseline data, and the application relies on an undefined design envelope along with unspecified mitigation measures. Key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. This results in an incomplete Environmental Impact Assessment, which fails to provide a comprehensive understanding of the likely significant effects or residual impacts.

Procedural failures are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment is a significant omission. These shortcomings hinder the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal is in clear conflict with National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural spaces, and cultural heritage, nor does it show that health and wellbeing impacts are acceptable. Additionally, it fails to provide evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially severe. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal would also 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 impacts on tourism are all permanent effects that cannot be adequately mitigated.

In conclusion, the application is both procedurally and substantively unfit for determination. The substantial information deficiencies, coupled with policy conflicts and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority must refuse consent on these grounds or invoke the appropriate

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

I have lived in the Highlands all my life, Crofting and holiday letting to support my family, we're not rich in a monetary way, but we have a quality of life that money cannot buy, we have a strong community bond, we work as best we can in harmony with nature, preserving the heritage, and fragile wildlife, and the island folk are the same, it breaks my heart to see this industrial renewable invasion, digging up deep peat, polluted our rivers and sea, dividing communities with the promise of wealth, these developments destroy all around them, and yet over their lifetime will make no difference to the climate, the environment will be devastated and is only a loose situation for the inhabitants of Lewis, whether it be human animal, or fauna. The tourism industry will suffer and in turn the island economy, there is no win here, please, when considering this application, consider the Island and its ecosystem, communities, and heritage, and not only a "net zero target".

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: AD3D1DAA

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 marine licensing and Environmental Impact Assessment regulations. A thorough review of the Environmental Impact Assessment Report and the accompanying documentation reveals several material deficiencies across planning, environmental, cultural, and procedural aspects. The project is located off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of this proposal, alongside its proximity to the shoreline, raise fundamental questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation necessary for a lawful determination. Important environmental data is absent, and the baseline information provided is both limited and inconsistent, leaving key elements of the proposal undefined. The application employs a flexible design framework that obscures an understanding of the likely significant effects, and the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims asserting negligible or non-significant effects lack robust supporting evidence.

There are evident and serious conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment process, or National Planning Framework 4, especially concerning biodiversity, cultural heritage, natural places, and public health. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and overall environmental integrity. Such conflicts directly impact the statutory tests needed for consent, undermining the competent authority's ability to deem the development acceptable within policy frameworks.

The unprecedented scale of the proposal introduces large turbines situated near the shoreline, creating significant concerns related to landscape capacity, visual dominance, and overall environmental impact. In light of the insufficient information provided, the reliance on undefined mitigation measures, evidential shortcomings, and apparent policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. In these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or trustworthy evaluation of the probable environmental repercussions of the proposal. By employing a flexible Project Design Envelope without any firm commitment to particular turbine dimensions, layouts, or configurations, significant uncertainty is introduced. This ambiguity undermines the integrity of the assessment and means that the impacts outlined may not accurately represent the development that is ultimately constructed. Consequently, both the public and the competent authority are deprived of a clear understanding of the true extent of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is being sought on the premise that environmental harm will be addressed after approval, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be thoroughly established before determination.

Moreover, there exist significant evidential deficiencies, such as gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations concerning biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental effects and mean that the competent authority lacks the necessary information to make a determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The proposed project exhibits significant shortcomings in its assessment of alternatives, failing to meet the statutory requirements laid out by the Environmental

Impact Assessment regime. Instead of delivering a coherent and reasoned comparison of realistic alternatives based on their environmental impacts, the application merely recounts the evolution of the project. This narrative approach does not adequately demonstrate that less harmful options have been properly identified, evaluated, and selected over more damaging solutions.

There is a clear lack of transparency and evidence in the comparison of alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has given serious consideration to placing turbines further offshore, which could potentially mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the absence of such analysis prevents a conclusion that the proposed siting is the least damaging option available.

The inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been adequately explored to minimise impacts on sensitive receptors. This includes culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis demonstrate that mitigation through design has not been employed, leading to a reliance on post-design measures to address impacts.

Consequently, the application does not prove that environmental harm has been adequately minimised through the choices made regarding site selection, layout, and infrastructure routing. This oversight constitutes a deviation from the established mitigation hierarchy and inhibits the competent authority from determining whether more suitable and less harmful alternatives are available. In the absence of a thorough assessment of alternatives, one cannot conclude that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, these deficiencies call into question the application's alignment with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw that underpins the overall conclusion that the application has not been sufficiently evaluated and cannot warrant a lawful determination.

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 west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. The ornithological assessment associated with this development is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. Despite the development being situated within key foraging areas and migratory pathways, the application fails to adequately evaluate the potential impacts of displacement, collision risk, or habitat loss on these vital species.

There exists a critical contradiction within the application, as the developer claims that there will be no significant adverse effects while simultaneously proposing a Habitats

Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises serious concerns regarding the reliability of the assessment and suggests that the conclusions drawn are unsupported by the available evidence. The assessment inadequately addresses whether seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, with a lack of thorough consideration given to the importance of these feeding grounds. The reliance on modelling approaches further introduces uncertainty, especially for species facing severe decline, such as Kittiwakes and Fulmars.

Moreover, placing turbines within a recognised migratory corridor poses an additional and substantial risk, effectively creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently consider the long-term repercussions of sustained mortality in this corridor or the potential impacts on species that have relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, along with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This activates the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

The identified deficiencies also suggest non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure 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's internal inconsistencies, methodological weaknesses, and lack of sufficient evidence render it unreliable. These shortcomings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not fulfill the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development on the West Lewis coastline lacks a thorough assessment of cultural heritage and community identity, failing to recognise the area as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The approach taken in the application reduces heritage to mere static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

A significant oversight is evident in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active places of burial and spiritual practice, yet they are categorised as static features in the assessment, which disregards their continued use, significance, and the impact of development on their surroundings. This misrepresentation leads to an incomplete

understanding of cultural effects and dismisses their importance in community life.

Additionally, 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 aspects are vital to the area's identity but are conspicuously missing from the analysis, marking a considerable omission. This lack of consideration hinders a comprehensive understanding of the cultural impact of the development.

There are also critical concerns related to community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as an Indigenous People, yet there has been no implementation of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the credibility of the assessment and does not adhere to established participatory principles regarding decisions that affect cultural and environmental interests.

A major procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone is sufficient to prevent a lawful determination.

From a policy standpoint, these deficiencies put the proposal at odds with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to acknowledge both tangible and intangible heritage, along with the neglect of living cultural practices, constitutes a clear violation of policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and adherence to statutory requirements results in a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a solid foundation for understanding the true cultural cost of the proposal.

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 is fraught with serious deficiencies that prevent a thorough evaluation of construction and pollution risks. There is a troubling absence of detailed Construction Environmental Management Plans and Pollution Prevention Plans, essential for a project involving substantial seabed preparation and installation in a challenging Atlantic environment. Instead, the application relies on undefined mitigation and contingency measures, to be formulated after consent, thereby obstructing any meaningful assessment of their effectiveness or adequacy.

This reliance on future, unspecified measures is particularly alarming in light of the West Lewis coastline's sensitivity, which features clean coastal waters and crucial habitats that are susceptible to sediment disruption and contamination. While the application recognises risks such as sediment mobilisation and the potential for chemical or oil spills, it falls short of providing sufficient detail on prevention, control, or monitoring strategies.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling or clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these potential impacts. This uncertainty also encompasses marine species and habitats deemed sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. The decision to postpone contingency planning until post-consent limits the ability to evaluate whether adequate safeguards will be in place to address pollution incidents. This introduces unnecessary procedural risk and undermines the competent authority's capacity to assess environmental protection measures before making a determination.

Regulatory compliance is also a significant concern, as the deferral of essential environmental safeguards contravenes the Environmental Impact Assessment regime's requirements. It is imperative that likely significant effects and mitigation measures are assessed prior to granting consent; the absence of this information renders a lawful determination impossible. Furthermore, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

Ultimately, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts combine to render the assessment materially deficient. These shortcomings highlight the inability to conduct a robust evaluation of construction and pollution risks, further reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of the socio-economic and ecological impacts on fisheries and marine life. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the proposal fails to adequately demonstrate that these vital habitats and uses can be preserved or maintained without causing significant disruption.

A critical concern is the presumption that fishing activities can be relocated without repercussions. The application does not provide sufficient evidence that alternative fishing grounds exist, are accessible, or can sustain the additional fishing pressure. This significant oversight risks contributing to overfishing in other areas and could have broader economic ramifications for the local fishing fleet. The lack of a thorough and

evidence-based assessment means that the impacts on fisheries and the livelihoods dependent on them remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly from the underwater noise created during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to disturb marine life over substantial distances, affecting species such as dolphins. The projected disturbance to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these potential effects without adequate supporting evidence.

There exists an evident inconsistency within the application, as it acknowledges the necessity for licences to allow harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, particularly when potential harm necessitates legal authorisation.

Additionally, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally inadequate, failing to consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and the onshore works are interconnected; however, they are assessed in isolation, leading to a fragmented analysis that masks the actual extent of environmental and socio-economic consequences.

Onshore elements encompass cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure that runs through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, which is an important

carbon store and an ecologically delicate habitat. The application lacks a thorough assessment of these impacts, which obstructs a comprehensive understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application fails to allow for a proper examination of cumulative effects. The Environmental Impact Assessment process stipulates that all components of a project must be assessed collectively; the division between offshore and onshore aspects results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats, including machair systems and peatland environments, both of which are subject to policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated or that appropriate avoidance strategies have been enacted. This absence highlights a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbance of peatland can lead to the release of stored carbon, potentially generating a carbon debt that undermines the objectives of renewable energy initiatives. The application fails to adequately address this matter or to show 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. The application provides no evidence that the requisite consents or processes have been started, which brings into question the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment of the project and the failure to demonstrate protection of peatlands, habitats, and land use interests contravene the National Marine Plan and the National Planning Framework 4. The inability to prove 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 substantiation regarding environmental and land use impacts render this aspect of the application incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

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

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

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

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

TOURISM

The Isle of Lewis relies heavily on tourism, which has seen considerable growth, increasing from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs. This sector represents up to 16% of the local economy. Despite this significance, the assessment of tourism impacts within the application is materially deficient, failing to evaluate the economic and social consequences for this key sector. While it is acknowledged that 86% of visitors are attracted to the area's scenery, there is no quantified analysis of how the proposed large-scale offshore infrastructure would affect visitor numbers, behaviours, or their overall economic contributions.

Moreover, the application does not account for the environmental quality that underpins tourism. The importance of the island's unspoiled landscapes and dark skies is critical to visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, leaving a significant gap in understanding the impacts on a recognised and growing part of the local economy.

The failure to address tourism impacts has broader implications for the island community, which has limited economic diversification. Without a compliant Island Communities Impact Assessment, the economic vulnerabilities faced by local businesses, employment opportunities, and community sustainability have not been adequately evaluated, as required under the Islands (Scotland) Act 2018.

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

In summary, the absence of quantified tourism impacts, the lack of assessment of environmental drivers influencing visitor behaviour, and the oversight of the island's economic dependency create a significant evidential gap. This inadequacy prevents a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. It is presented now under a supposedly stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis for this proposal. Critical gaps in baseline data exist, along with the use of an undefined design envelope. The reliance on unspecified mitigation measures is troubling, and significant impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment constitutes a significant

omission. These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In addition, the proposal contradicts the National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural places, and cultural heritage. It does not adequately show that health and wellbeing impacts are acceptable nor does it provide evidence of a net economic benefit, lacking tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly assessed, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

The beauty of the area and the wildlife is what brings people like me to the area, I spend money in the local economy to enjoy this landscape and if this goes ahead I shall not be tortured like many others, the onward impact is also going to be extremely damaging to other beautiful areas by energy infrastructure and development impacting people's enjoyment. Visual impact will be unacceptable.

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B37EB953

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

Dear Sir/Madam

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

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

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

The unprecedented scale of this proposal raises additional concerns, particularly with the large turbines being sited in close proximity to the shoreline. This introduces significant worries about landscape capacity, visual impact, and broader environmental ramifications. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations illustrate that the application is incomplete and unable to support a lawful decision. In light of these circumstances, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, and trustworthy evaluation of the potential environmental impacts of the proposal. A flexible Project Design Envelope is employed without commitment to specific dimensions or configurations of turbines, resulting in considerable uncertainty. This lack of specificity hinders the consistent application of a worst-case scenario, thus compromising the integrity of the assessment. Consequently, the impacts outlined may not correspond to the actual development, obscuring the true extent of environmental effects for both the public and the competent authority.

The application predominantly hinges on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought on the premise that any environmental damage will be managed at a later stage. This approach inhibits any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. Such deferral of crucial information to post-consent phases is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies are explicitly established before the determination process.

Moreover, there exist substantial evidential shortcomings, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions instead of robust site-specific evidence. This leads to uncertainty regarding both the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without sufficient supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not satisfy the evidential standard required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These significant deficiencies impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The proposed development raises significant concerns due to the inadequacy of the assessment of alternatives, which fails to comply 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, the application presents a narrative of project development that does not adequately demonstrate that less harmful options have been properly identified and evaluated in favour of more damaging solutions.

There is a glaring lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not convincingly show that the developer has genuinely considered positioning the turbines further offshore, where the potential for reducing visual, ecological, and coastal impacts would likely increase. Considering the sensitivity of the West Lewis coastline, along with the crucial role that proximity to shore plays in determining impact, the failure to conduct such an analysis means that it cannot be concluded that the proposed siting is the least damaging alternative.

The shortcomings are further evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been implemented. Instead, the application relies heavily on post-design mitigation measures.

Consequently, the application does not sufficiently demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a robust assessment of alternatives, it cannot be claimed that the proposal is sustainable or compliant with policy.

From a policy standpoint, this significant deficiency undermines adherence to the National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment represents a critical omission that leads to the overall 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 exhibits significant deficiencies, failing to deliver a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is biologically active and highly sensitive, yet the baseline data remains incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat utilisation of key species, undermining the evidential basis for evaluating impacts.

One notable oversight pertains to otters, classified as a European Protected Species.

The application does not adequately recognise or assess their use of coastal areas for foraging and movement. The absence of an evaluation of their core foraging range and behavioural patterns results in a failure to adequately consider the potential effects of construction disturbance, noise, and increased activity, thereby undermining conclusions regarding the absence of significant effects on this species.

Further weaknesses appear in the assessment of basking sharks, with a reliance on aerial surveys that introduce significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. Neglecting to incorporate or properly assess such data results in an incomplete baseline, consequently weakening the reliability of the presented conclusions.

These methodological shortcomings render the conclusions of negligible or non-significant effects reliant on assumptions rather than robust evidence. The lack of sufficient baseline data obstructs meaningful evaluation of cumulative and indirect impacts, which includes considerations for seasonal variation and broader ecosystem interactions. This uncertainty complicates understanding the true scale of risk to marine species and habitats.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These shortcomings inhibit 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 assessment of the proposed development is deeply flawed, characterised by significant internal inconsistencies and a lack of robust evidence, which undermines its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not suffer adverse effects. The proposed site lies within critical foraging areas and migratory pathways, yet the assessment neglects to thoroughly evaluate the risks of displacement, collision, and habitat loss.

Furthermore, a fundamental contradiction arises within the application: the developer asserts that no significant adverse effects will occur while simultaneously presenting a case for Habitats Regulations derogation, which is only warranted when significant

harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that its conclusions are not substantiated by the evidence provided. The assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial nature of these feeding grounds is insufficiently considered, and the reliance on modelling methods introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a further significant risk, effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been adequately assessed, nor have the potential effects on species with small global populations been considered. From a regulatory standpoint, the application does not meet the evidential threshold necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, precluding a lawful conclusion in favour of consent.

The deficiencies in the assessment also indicate a failure to comply with National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy. In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, all of which obstruct a thorough evaluation of impacts and affirm that the application does not fulfil the statutory requirements for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where the environment, language, tradition, and community are interconnected. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach that treats heritage as a series of isolated, static assets, failing to acknowledge their ongoing social, cultural, and spiritual functions within the community.

Significant deficiencies arise in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These active places of burial and spiritual practice have been categorised as static features, which neglects their continued use and the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores their importance within community life.

Furthermore, the assessment does not address intangible cultural heritage, including the Gaelic language and traditions, as well as the long-standing relationship between the community and the coastal environment. These elements are central to the area's identity yet are completely absent from the assessment, marking a significant omission. Without considering these factors, the cultural impact of the development cannot be accurately understood.

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

Another critical procedural failure is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone precludes a lawful determination.

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

Overall, the lack of assessment 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 have not been properly evaluated, and the application does not provide a sufficient basis for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The magnitude of visual change associated with this application is inadequately represented. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints in the

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

The reliance on undefined future measures raises particular concerns given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are at risk from sediment disturbance and contamination. While the application does recognise risks such as sediment

mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring measures for these incidents.

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

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

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

In summary, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty concerning potential impacts collectively render the assessment materially deficient. These failings prevent a thorough evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The 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.

TOURISM

The economy of the Isle of Lewis significantly relies on tourism, which has grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this importance, the application does not model the potential impacts of offshore infrastructure on the tourism sector, particularly concerning visitor numbers, behaviour, or overall economic contributions. The assessment overlooks the industrialisation of the seascape and the potential loss of environmental quality, failing to evaluate how these factors could affect Tourism Gross Value Added and the overall resilience of the local economy.

Tourism is fundamentally reliant on the area's wild coastline, unspoiled landscapes, dark skies, and sense of remoteness. The application acknowledges that 86% of visitors are attracted by scenery but lacks a quantified analysis of how large-scale developments might influence this attraction. The omission of a Dark Skies Assessment further exacerbates the deficiencies in the evaluation, leaving significant uncertainties

about impacts on emerging markets like nature-based tourism and astro-tourism.

The implications of failing to assess tourism impacts extend beyond the sector itself, affecting employment, local businesses, and community sustainability in a context where economic diversification is already limited. The absence of a compliant Island Communities Impact Assessment means that critical economic vulnerabilities related to tourism have not been properly examined, contrary to the requirements set out under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not meet the standards of the National Planning Framework 4 regarding economic impact and the necessity of demonstrating a net benefit. It conflicts with strategic objectives that position tourism as a key growth sector and lacks the evidence needed for competent authorities to fully understand the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and recognise the island's economic dependency creates a substantial evidential gap. This deficiency hinders a thorough evaluation of the economic effects and underscores the incompleteness of the application.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development according to statutory duties, national policy, and evidential standards. This application revisits the central issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was clearly established. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application still lacks a reliable evidential foundation for determination.

Critical gaps exist in the baseline data, and the use of an undefined design envelope raises concerns. Furthermore, there is a reliance on unspecified mitigation measures, and key impact pathways—such as nocturnal wildlife, the full onshore infrastructure, and tourism effects—have been omitted. This makes the Environmental Impact Assessment incomplete, thereby hindering a comprehensive understanding of potential significant effects or residual impacts.

There are procedural shortcomings that cannot be overlooked. The failure to produce a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the lack of a full Social Impact Assessment represents a significant omission. These inadequacies obstruct the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

In terms of policy alignment, the proposal is at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural spaces,

and cultural heritage. Health and wellbeing impacts are not shown to be acceptable, and there is a lack of evidence for a net economic benefit due to missing tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore elements have not been thoroughly assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty looms regarding environmental risks, with assessments of marine ecology, seabirds, protected species, and marine mammals appearing incomplete and sometimes inconsistent. The evidential threshold necessary to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and obstructs a lawful conclusion regarding acceptable impacts.

Substantial and irreversible changes to a highly sensitive landscape would result from this proposal. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and negative impacts on tourism represent enduring consequences that cannot be adequately mitigated.

Overall, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, policy conflicts, and unresolved environmental risks precludes an evidence-based and lawful decision. The competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to necessitate the submission of the required missing information.

In light of these concerns, 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: BF22F48A

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is founded on a comprehensive review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. The development's location off the west side of the Isle of Lewis is notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity, all of which heighten concerns about the proposal's compatibility with statutory requirements and national policy.

Critical environmental data is conspicuously absent from the application, with limited and inconsistent baseline information. Key elements of the proposal remain undefined, which, combined with the use of a flexible design framework, creates ambiguity regarding the likely significant effects of the project. The reliance on unspecified mitigation measures further complicates the assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, and community impacts, undermining the claims of negligible or non-significant effects, which lack robust evidence.

Moreover, the proposal presents clear and substantive policy conflicts. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, diminishing the ability of the competent authority to determine the proposal's acceptability from a policy standpoint.

The unprecedented scale of the proposal raises further concerns, as it involves large turbines situated in close proximity to the shoreline, which could result in significant landscape capacity issues, visual dominance, and environmental consequences. The combination of insufficient information, the reliance on undefined mitigation measures, and evident policy non-compliance illustrates that the application is incomplete and unsuitable for a lawful determination. Under these circumstances, it is imperative that the precautionary principle 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 assessment of alternatives within the application is significantly inadequate and does not fulfil the statutory requirements set out in the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of viable alternatives based on environmental effects, the application merely presents a narrative of project evolution. This methodology does not substantiate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Furthermore, there is a lack of transparent or evidence-based evaluation of alternative offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has genuinely considered siting turbines further offshore, where the visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the absence of such analysis obstructs any conclusion that the proposed siting is the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where insufficient evidence exists to confirm that alternative routes have been thoroughly explored to avoid or reduce impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that mitigation through design has not been employed, leading to an overreliance on post-design mitigation measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy, which prevents the competent authority from ascertaining whether less harmful and more appropriate alternatives are available. In the absence of a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment is a significant omission that leads to the overall conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to provide a reliable understanding of the ecological receptors in the West Lewis coastal environment. This marine system is not only highly sensitive but also biologically active. Despite this, the baseline data is incomplete and the methodologies employed do not effectively capture species presence, behaviour, and habitat use, ultimately leading to an unreliable foundation for evaluating impacts.

A critical issue pertains to otters, classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that potential effects stemming from construction disturbance, noise, and increased activity have not been thoroughly evaluated. Such deficiencies undermine any conclusions about the absence of significant effects on otters.

Additionally, the assessment of basking sharks is similarly compromised. The reliance on aerial surveys introduces a significant bias in detection, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks when compared to established land-based observations that show frequent use of these waters. The omission of relevant data in this regard leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that any conclusions drawn about negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual scale of risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainties introduced by these deficiencies prevent the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, granting consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application for the development is fundamentally flawed and cannot be relied upon. It presents significant gaps in evidence and contains internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, which are already in decline. However, the application fails to sufficiently demonstrate that these species will not be adversely affected. This development is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss have not been adequately evaluated.

The application contains a notable contradiction; while the developer concludes that there are no significant adverse effects, they also put forward a Habitats Regulations

derogation case. This is only necessary when significant harm is expected, which raises serious questions about the reliability of the assessment. Furthermore, there is inadequate evidence to support the claim that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully recognised, and reliance on modelling approaches introduces further uncertainty, particularly for species facing severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially considering that baseline data is incomplete and behavioural responses remain inadequately understood.

The location of turbines within a recognised migratory corridor poses an additional and significant risk, 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 implications of sustained mortality within this corridor or consider the potential effects on species that have relatively small global populations.

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

Overall, the assessment is unreliable due to these internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity related to the proposed development is seriously flawed. It does not recognise the West Lewis coastline as a dynamic cultural landscape that intertwines environment, language, tradition, and community. Instead, the application reduces heritage to isolated, static assets, ignoring their ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated as unchanging features in the assessment, despite being active places of burial and spiritual practice. This oversight fails to acknowledge their continued use and significance, leading to an incomplete evaluation of cultural effects and neglecting their importance in community life.

Moreover, the application does not address intangible cultural heritage, which includes the Gaelic language and traditions as well as the long-standing connection between the community and the coastal environment. These critical elements are absent from the assessment and represent a significant oversight, preventing a full understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that aligns with the characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the legitimacy of the assessment and fails to adhere to principles of participation in decisions affecting cultural and environmental interests.

A key procedural failure is the lack of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018. The absence of this assessment means the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies contradict the National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, as well as living cultural practices, clearly diverges from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

Moreover, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with references to "cultural loss" appearing in the developer's findings. However, these impacts have not been adequately reflected in the

main application or assigned appropriate weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This situation adversely affects the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be at risk. By failing to provide the complete dataset, the application lacks a solid evidential basis for weighing benefits against potential harm.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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 application lacks essential detail needed to thoroughly assess construction and pollution risks, rendering it materially deficient. It involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures that are to be developed after consent has been granted, which prevents any meaningful evaluation of their effectiveness or adequacy.

This reliance on undefined future measures raises serious concerns, particularly considering the sensitivity of the receiving environment. The West Lewis coastline is

home to clean coastal waters and crucial habitats that are susceptible to contamination and sediment disturbance. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it does not provide adequate details on how these risks will be managed, controlled, or monitored.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. Without robust modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these activities. This uncertainty applies to potential effects on marine species and habitats that have already been identified as sensitive in broader assessments.

Additionally, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders the evaluation of whether suitable safeguards are available to address potential pollution incidents. This creates procedural risks and undermines the ability of the competent authority to effectively assess the environmental protection measures at the stage of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and necessary mitigation measures must be evaluated prior to the granting of consent; the absence of such information means that a lawful determination cannot be made. Furthermore, the application fails to show compliance with policy requirements regarding environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainty about potential impacts collectively demonstrate the inadequacy of the assessment. These shortcomings obstruct a comprehensive evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a robust 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 and support an active fishing industry. However, the proposal fails to adequately demonstrate how these habitats and activities can be protected or maintained without significant disruption.

One major concern is the assumption that fishing activities can be displaced without negative consequences. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of supporting any additional pressure. This is a critical omission, as such displacement poses a risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to cause significant disturbance over large distances, affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is particularly concerning, yet the application appears to downplay the significance of these effects without adequate supporting evidence.

There is a notable inconsistency in the application regarding the need for licences to permit harm to European Protected Species, acknowledged while simultaneously claiming the impacts are negligible. This contradiction raises doubts about the credibility of the assessment and raises issues of compliance with the Habitats Regulations, especially where harm is anticipated to the extent that legal authorisation would be necessary.

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

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application all contribute to an assessment that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns about carbon balance. The disturbance of peatland can lead to the release of stored carbon, resulting in a carbon debt that is contrary to the goals of renewable energy development. The application fails to sufficiently address this matter or demonstrate that the overall carbon balance will remain positive.

Moreover, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence presented that indicates the necessary consents or processes have been initiated, which calls into question the deliverability and lawful execution of the project.

There are substantial risks to sensitive habitats, including machair systems and

peatland environments, which are afforded policy protection. The application does not show that impacts on these habitats have been fully assessed or that suitable avoidance measures have been taken. This reveals a significant evidential gap in terms of biodiversity protection.

The assessment of onshore infrastructure is materially incomplete and does not account for the full range of impacts associated with what is fundamentally a single integrated project. The onshore works and offshore turbines are intrinsically linked yet assessed separately, leading to a fragmented approach that conceals the true scale of environmental and socio-economic effects.

The onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure that traverses sensitive landscapes. These works entail excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be assessed collectively; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain inadequately understood.

From a policy standpoint, the failure to consider the project as a unified 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 significantly undermines the validity of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to environmental quality, cultural identity, and tourism. The proposed introduction of permanent red aviation lighting, visible from long distances, would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Moreover, the application lacks an evaluation of the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly notable given the importance of dark skies to the area's identity

and its emerging tourism sectors, including astro-tourism. The resulting failure to consider these impacts signifies a substantial gap in the overall landscape and environmental assessment.

Critically, there is no evaluation of the impacts on nocturnal wildlife. Certain species, such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are highly sensitive to artificial lighting, as phototaxis can result in disorientation and increased risk of collision. The application fails to incorporate any lighting impact assessment or phototaxis study, thus neglecting to address how aviation lighting might affect these species or contribute to mortality.

This omission is exacerbated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this potential impact has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding ecological impacts.

Without an assessment of nocturnal impacts, it remains 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 fulfilled, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, it undermines the wider assessment of landscape and seascape impacts, as night-time character is an essential component of the environment.

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

TOURISM

The total contribution of tourism to the Isle of Lewis economy reached over £81.5 million, with this sector supporting more than 1,000 jobs and accounting for up to 16% of the island's economy, an increase from £65 million in 2017. Despite this growth, the application fails to model the potential impact of large-scale offshore infrastructure on tourism, particularly regarding visitor numbers and the overall economic contribution of the sector. The assessment does not provide a quantified evaluation of how the industrialisation of the seascape and a reduction in environmental quality could affect Tourism Gross Value Added or the resilience of the local economy.

Tourism heavily relies on the natural assets of the area, including its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application

acknowledges that 86% of visitors are attracted by the scenery; however, it neglects to assess the importance of these environmental qualities in influencing visitor experiences and emerging markets, such as nature-based tourism and astro-tourism. Furthermore, the lack of a Dark Skies Assessment exacerbates the deficiencies in the application, leaving a critical gap in understanding the effects on a recognized and expanding segment of the local economy.

In light of the limited economic diversification within the island community, the disregard for tourism impacts presents broader concerns for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that the economic vulnerabilities inherent in the region have not been sufficiently evaluated, contrary to the requirements set forth by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding the economic impact and the necessity to exhibit a net benefit. It contradicts strategic objectives that identify tourism as a priority growth sector, lacking adequate evidence for the competent authority to assess the economic ramifications of the proposed development.

Overall, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and take into account the island's economic dependence results in a substantial evidential gap. This gap obstructs a thorough evaluation of economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

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

A reliable evidential basis for decision-making is notably absent, with critical gaps in baseline data and an undefined design envelope. The application depends on unspecified mitigation measures, and it neglects to consider key impact pathways such as those affecting nocturnal wildlife, the entirety of onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment is incomplete, hampering a full understanding of the likely significant effects and residual impacts.

The proposal also suffers from procedural deficiencies. Notably, it lacks a compliant Island Communities Impact Assessment, violating the Islands (Scotland) Act 2018, and does not disclose a complete Social Impact Assessment, which is a significant omission. These shortcomings hinder the competent authority's ability to evaluate the

implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

The environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

All of the above are reasons not to go ahead with this monstrous plan.

Small local power generated schemes are the best, why would you sign a contract with energy providers that they get paid when switched off that's crazy. Why wasn't the grid upgraded first is there no logic to these plans. The country is ruined as it is and don't get me started on the battery warehouses which are planned in Aberdeenshire with solar panels on north side of hills!!!

When I asked 1 company why the lines weren't going on the sea bed in was told the Russians might cut the cables yet a primary kid could find the pylons on Google earth. It is madness

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: 3E622D32

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. It is informed by an examination of the Environmental Impact Assessment Report and accompanying documents, 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 renowned for its Atlantic-facing coastline, relatively untouched environment, and rich cultural identity. Concerns arise from the proposal's scale, proximity to the shoreline, and design, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful decision. Key environmental data is absent, baseline information is inconsistent and limited, and several crucial elements of the proposal remain undefined. The adoption of a flexible design framework obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to evaluate their efficacy. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts involved, and the assertions of negligible or non-significant effects are unsubstantiated by robust evidence.

Furthermore, there are evident and substantial conflicts with policy. The proposal seems 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 provide assurance that national standards for protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These discrepancies directly affect the statutory criteria required for consent and compromise the competent authority's ability to determine that the development is acceptable under policy frameworks.

The unprecedented scale of this proposal introduces large turbines positioned very near to the shoreline, raising major concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of adequate information, the reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a comprehensive, transparent, or trustworthy analysis of the potential environmental consequences of the proposed development. The application's use of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty and obstructs the consistent application of a worst-case scenario. This situation undermines the credibility of the assessment, meaning that the impacts discussed may not accurately represent the final development, thus hindering both public understanding and the competent authority's ability to grasp the full extent of environmental effects.

Consent is being sought with a heavy reliance on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. This approach postpones the assessment of environmental harm to a later stage, which diminishes the opportunity for a meaningful evaluation of the effectiveness of those measures or the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigations be clearly identified before determination.

Additionally, the report presents considerable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where assertions of negligible or non-significant effects are made without strong supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential threshold required under 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 regarding biodiversity protection and environmental integrity, as it is unclear whether impacts have been fully assessed or if appropriate safeguards are established.

In summary, the dependence on an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and rigorous evaluation of environmental effects and indicate that the competent authority cannot make a decision based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in the assessment of marine ecology and protected species, failing to provide a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its biological activity, yet the baseline data remains incomplete, and the methodologies

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

A critical shortcoming is the inadequate recognition and assessment of otters, a European Protected Species, which actively use coastal areas for foraging and movement. The application does not take into account their core foraging range or behavioural patterns, leading to an insufficient evaluation of the potential effects caused by construction disturbances, noise, and increased activity. This oversight compromises any conclusions drawn about the absence of significant effects on this species.

Similarly, the assessment of basking sharks is flawed due to the reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence when compared with established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate relevant data undermines the baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions regarding negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including variations across seasons and interactions within the wider ecosystem. This uncertainty raises concerns about the actual risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate that internationally important seabird populations will not be adversely affected, particularly in light of the west coast of the Isle of Lewis supporting many species already in decline. The assessment is materially flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its conclusions. It does not adequately evaluate the implications of displacement, collision risk, or habitat loss, particularly within key foraging areas and migratory pathways.

A key contradiction exists, as the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious concerns regarding the reliability of the assessment and suggests that the conclusions presented lack support from the underlying evidence. The application neglects to provide sufficient evidence that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, failing to fully account for the importance of these feeding grounds. Additionally, the reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars, and is likely to underestimate mortality rates, especially where baseline data is lacking and behavioural responses are poorly understood.

The siting of turbines within a recognised migratory corridor adds a significant risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately address the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This situation engages the precautionary principle and precludes a lawful conclusion in support of consent. Moreover, the identified deficiencies indicate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The 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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented fails to adequately reflect the sensitivity of the environment and the scale of change anticipated. The West Lewis coastline is characterised by its undeveloped nature, open Atlantic horizon, and a profound sense of remoteness. The installation of large-scale turbines in close proximity to the shoreline would establish a dominant industrial presence, which would fundamentally alter this unique character, resulting in a permanent and irreversible transformation of the landscape.

The proposal inadequately represents the magnitude of visual change. Given the scale and proximity of the turbines, they would overwhelmingly dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct impact on visual amenity, significantly eroding the qualities of naturalness and remoteness. The assessment does not effectively convey the true level of impact or its

significance within such a sensitive landscape.

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

Moreover, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Prominent sites like the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape setting that is visually and spatially linked to the Atlantic horizon. By treating these as isolated assets, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of the construction and pollution risks associated with the proposal is insufficient and lacks the necessary detail to evaluate the potential environmental impacts adequately. The project entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it does not present fully developed 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 impedes any meaningful assessment of their adequacy or

effectiveness.

This reliance on unspecified future measures is particularly worrisome due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges the risks associated with sediment mobilisation and accidental chemical or oil spills, it does not provide adequate details on how these incidents will be prevented, controlled, or monitored.

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

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application limits the ability to evaluate whether proper safeguards are in place to manage pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures adequately at the point of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed before granting consent, and the absence of such information renders a lawful determination impossible. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, a lack of detailed management plans, and uncertainty about 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 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 regarding onshore infrastructure is significantly deficient, failing to capture the complete range of impacts from what constitutes a single integrated project. The offshore turbines and the associated onshore works are closely interconnected; however, they have been evaluated in isolation. This fragmented assessment obscures the true extent of environmental and socio-economic consequences.

Central to the onshore elements are the proposed cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly in Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. Without a thorough evaluation of these effects, the project's overall environmental impact remains unclear.

Furthermore, by omitting or postponing the assessment of onshore impacts, the application undermines the ability to effectively evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; yet, the division between offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities are inadequately understood.

Significant risks to sensitive habitats, such as machair systems and peatland environments, are present and these areas are subject to policy protection. The application fails to show that these impacts have been fully evaluated or that suitable avoidance measures have been put in place, creating a noticeable evidential gap regarding biodiversity protection.

Concerns also arise surrounding carbon balance, as the disruption of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains positive.

Moreover, routing the infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, raising doubts about its feasibility and legal compliance.

From a policy standpoint, the failure to assess the project as a cohesive whole and to adequately protect 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.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial for maintaining environmental quality, cultural identity, and tourism value. However, the assessment of dark skies and nocturnal wildlife is completely missing from the Environmental Impact Assessment, creating a significant omission. The proposed development introduces permanent red aviation lighting, which would be visible over long distances and create an intrusive "wall of light" effect along the western horizon. This would fundamentally alter the night-time environment.

Moreover, there has been no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is alarming, especially given the importance of dark skies to the

area's identity and the growth of tourism sectors such as astro-tourism. The failure to address these impacts leads to a substantial gap in the overall assessment of landscape and environmental effects.

Even more concerning is the absence of an evaluation of impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can result in disorientation and a higher risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to evaluate how the aviation lighting might affect these species or contribute to increased mortality rates.

This issue is further exacerbated by the reliance on daytime survey data for the ornithological assessment, which overlooks nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been taken into account. The lack of site-specific night-time data represents a critical deficiency in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard required to rule out negative effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and hindering lawful decision-making.

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the broader evaluation of landscape and seascape impacts, as the character of night-time is an essential aspect of the environment.

Collectively, the absence of any assessment concerning dark skies and nocturnal wildlife forms a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unsuitable for supporting a lawful determination.

TOURISM

The 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 fails to meet the requirements for sustainable development when evaluated against statutory duties and national policy. This application echoes the key issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a comprehensive evidential basis for evaluation.

Critical gaps in baseline data are apparent, alongside the use of an undefined design envelope. The reliance on unspecified mitigation measures and the omission of vital impact pathways, such as nocturnal wildlife, full onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. This deficiency hinders a full understanding of potential significant effects and residual impacts.

Procedurally, the proposal suffers from clear failures. The lack of a compliant Island

Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018, while the failure to provide the complete Social Impact Assessment represents a significant omission. Such shortcomings obstruct the competent authority's ability to assess 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 protect biodiversity, natural places, or cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and cannot evidence a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the proposal remain uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, as well as inconsistencies within those assessments, mean that the evidential standard required to rule out adverse effects has not been achieved. This situation activates the precautionary principle, precluding a lawful conclusion about the acceptability of impacts.

The proposal would bring about considerable and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and adverse impacts on tourism represent permanent consequences that cannot be adequately mitigated.

Considering all these factors, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, alongside conflicts with policy and unresolved environmental risks, obstruct 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 visit the island every year and my family are from the Hebrides. I am appalled that this development is even being considered in one of the few beautiful natural habitats we have left.

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: BFDF78A7

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies related to planning, environmental considerations, cultural implications, and procedural adherence. The development is set to be located off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine natural environment, and rich cultural heritage. Concerns arise regarding the scale, proximity, and design of the wind farm, which raise fundamental questions about its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks an adequate evidential foundation for a lawful determination. Critical environmental data is absent, baseline information is both limited and inconsistent, and numerous aspects of the proposal are left undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures means that their effectiveness remains unassessed. Consequently, the documentation falls short of providing a comprehensive or informed perspective on the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsupported by robust evidence.

Moreover, there are evident and substantive policy inconsistencies. The proposal appears to conflict with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It fails to establish that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These inconsistencies directly challenge the statutory tests necessary for consent and jeopardise the ability of the relevant authority to determine that the development aligns with policy criteria.

The scale of the project is unprecedented for this area, with large turbines to be located in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual impact, and environmental ramifications. Collectively, the lack of adequate information, the reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial and render it fundamentally unreliable. The absence of specific turbine dimensions, layouts, or configurations due to the use of a flexible Project Design Envelope introduces a significant level of uncertainty. This lack of commitment prevents the application of a worst-case scenario consistently, which compromises the integrity of the assessment. Consequently, the impacts described may not accurately represent the final development, hindering both public comprehension and the ability of the competent authority to gauge the true environmental effects.

Moreover, the application hinges on mitigation measures, monitoring strategies, and management plans that have not yet been established. Seeking consent based on the promise of addressing environmental harm at a later date impedes any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment process, which mandates that significant effects and necessary mitigations be clearly identified before any determination is made.

Additionally, the report suffers from evidential shortcomings, which include gaps in baseline data and methodological limitations. The reliance on assumptions instead of site-specific evidence creates uncertainty surrounding the scale and significance of impacts. This is particularly concerning where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot align with statutory requirements.

Due to these shortcomings, the application does not meet the evidential threshold established under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This raises concerns about the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal fails to comply with the requirements outlined in National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been comprehensively assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data collectively undermine the reliability and completeness of the Environmental Impact Assessment Report. These critical deficiencies mean that a lawful and thorough assessment of environmental effects cannot be conducted, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough assessment of alternatives, which is a crucial requirement of the Environmental Impact Assessment regime. Instead of delivering a

well-structured and reasoned analysis of realistic alternatives based on their environmental effects, it presents a narrative detailing the evolution of the project. This method does not convincingly show that less harmful options have been adequately identified, evaluated, and chosen over more damaging alternatives.

There is a noticeable absence of transparent and evidence-based comparisons regarding alternative offshore locations, varying development scales, or differing design configurations. Specifically, the application fails to indicate that the developer has genuinely considered positioning turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline's sensitivity and the critical role of proximity to shore in determining impact highlight the necessity of such analysis, which is unfortunately missing, preventing any conclusion that the proposed site represents the least damaging choice.

The shortcomings also extend to the evaluation of cable routing and landfall, where there is inadequate evidence that alternative paths have been thoroughly investigated to mitigate impacts on sensitive receptors. This includes notable sites of cultural and spiritual significance, such as Barvas Cemetery. The lack of a definitive avoidance strategy and comparative analysis suggests that mitigation by design has not been effectively implemented, relying instead on measures aimed at alleviating impacts after the design phase.

Consequently, the application does not satisfactorily show that environmental harm has been reduced through careful site selection, layout, and routing of infrastructure. This oversight signifies 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 comprehensive alternatives assessment, it cannot be affirmed that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a significant omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant shortcomings that compromise our understanding of the ecological receptors in the West Lewis coastal environment. This area is not only sensitive but also biologically active, yet the baseline data provided is insufficient. The methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species, leading to a lack of sound evidential basis for evaluating potential impacts.

One critical oversight concerns otters, which are classified as a European Protected

Species. The application fails to acknowledge their active foraging and movement along the coast, and neglects to assess their core foraging range and behavioural patterns. This oversight means the potential impacts of construction-related disturbances, including noise and increased activity, have not been thoroughly evaluated, undermining any assertions regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks demonstrates further deficiencies. The reliance on aerial surveys introduces substantial detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when juxtaposed with reliable land-based observations that indicate frequent utilisation of these waters. The neglect to include or appropriately assess such data contributes to an incomplete baseline and diminishes the reliability of the findings.

These methodological flaws result in conclusions regarding negligible or non-significant effects that are founded on assumptions instead of robust evidence. Moreover, the lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, which raises concerns about the true risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to identify or adequately assess the protected species involved. The uncertainty created by these deficiencies obstructs the possibility of excluding adverse effects beyond a reasonable scientific doubt, thereby necessitating the precautionary principle. In light of these issues, granting consent is not a lawful option.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions culminates in an unreliable assessment. These critical failings hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application concerning the potential impacts on ornithological interests is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate, to the required evidential standard, that the internationally important seabird populations located on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected by the proposed development. The placement of turbines within key foraging areas and migratory pathways has not been adequately evaluated, particularly regarding the risks of displacement, collision, and habitat loss.

A critical inconsistency arises within the application where the developer asserts that no significant adverse effects will occur while simultaneously pursuing a Habitats

Regulations derogation case, which is necessitated only in scenarios where significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment, indicating that the conclusions drawn are not supported by the underlying evidence.

The evidence provided does not sufficiently assure that seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds is not fully considered, and the reliance on modelling approaches introduces uncertainty, especially for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly given incomplete baseline data and an inadequate understanding of behavioural responses.

Furthermore, situating turbines within a recognised migratory corridor presents an additional substantial risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately address the long-term consequences of sustained mortality in this corridor or the potential impacts on species that possess relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, compounded by data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle and obstructs a lawful conclusion in support of consent.

These deficiencies also signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted places the proposal directly at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development has not adequately addressed the cultural heritage and community identity associated with the West Lewis coastline, which serves as a living cultural landscape where environment, language, tradition, and community are deeply interconnected. The assessment reduces heritage to isolated, static assets and fails to recognise their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites

and places for spiritual practice; however, they are mischaracterised as static features in the assessment. This oversight neglects their continued use and meaning, as well as the potential impacts of development on their setting, leading to an incomplete evaluation of cultural effects and overlooking their importance in community life.

Moreover, the assessment does not consider intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the evaluation, creating a significant gap in understanding the cultural implications of the development.

There are additional concerns related to community rights and engagement. The Gaelic-speaking population holds a unique cultural identity that aligns with characteristics of an Indigenous People. Nevertheless, there has been no process of Free, Prior and Informed Consent, which undermines the credibility of the assessment and fails to adhere to established principles of participation in decisions impacting cultural and environmental interests.

A critical procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot legally fulfil its duty to evaluate the social, cultural, and economic effects on the island community, preventing a lawful determination of the proposal.

From a policy standpoint, these deficiencies place the application in direct conflict with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and the failure to recognise living cultural practices represent a clear violation of policy requirements.

Overall, the failure to evaluate living heritage, intangible cultural value, community rights, and compliance with statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately assessed, leaving the application without a sufficient basis to evaluate the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal currently under consideration has significant deficiencies in the assessment of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the complete report remains unpublished. This creates a notable evidential gap, hindering both public understanding and the competent authority's ability to assess the full range of social risks highlighted by the developer's own investigations.

Residents have reported experiencing measurable stress, anxiety, and concern linked to the scale and proximity of the proposal, as indicated by available summaries. These

impacts are based on direct engagement, thus are not speculative in nature. Nevertheless, the lack of access to the full assessment curtails proper scrutiny of its findings and restricts the evaluation of their significance during the decision-making process.

Additionally, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with findings from the developer indicating concerns over “cultural loss.” Despite these impacts being identified, they have not been thoroughly incorporated into the main application or given due consideration. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency fundamentally undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when they may affect community character and functioning. The absence of the complete dataset means the application does not provide an adequate evidential foundation for weighing the benefits against the harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 with respect to health and wellbeing. Development proposals must foster positive health outcomes and avoid causing harm, yet the evidence currently available points to existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to establish compliance with this policy.

The procedural implications of these omissions are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material deficiency within 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 results in an incomplete and unreliable assessment. This situation precludes a lawful determination and reinforces the conclusion that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking and does not adequately account for the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would establish a dominant industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

This application fails to accurately convey the magnitude of the visual change that would ensue. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the intrinsic qualities of naturalness and remoteness. There is a notable shortcoming in how this impact is presented, failing to reflect its significance within such a sensitive landscape.

There are also serious methodological issues concerning the chosen visual viewpoints. Evidence indicates that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises concerns that the magnitude of visual impact may have been understated, compromising the reliability of the assessment.

Additionally, the assessment does not adequately consider the interconnected nature of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected visually and spatially to the Atlantic horizon. The assessment treats these assets as isolated rather than acknowledging their interdependence, leading to an incomplete understanding of impacts on their context and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their link to the natural horizon. This results in not just a visual impact but a wider cultural and spatial detriment that the application has not sufficiently evaluated.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural landscapes and historic assets. The level of change proposed is inconsistent with the imperative to preserve landscape character, visual amenity, and the context of culturally significant sites. Moreover, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy guidelines.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant concerns regarding the assessment of construction and pollution risks, which is incomplete and lacks the necessary detail to evaluate

potential environmental effects. It involves considerable seabed preparation and installation work within a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that are to be prepared after consent, hindering any meaningful evaluation of their adequacy or effectiveness.

The reliance on unspecified future measures raises particular concerns in light of the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to sediment disturbance and contamination. Although the application acknowledges risks associated with sediment mobilisation and the potential for accidental chemical or oil spills, it fails to offer sufficient detail on the prevention, control, or monitoring of these risks.

There exists uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also applies to potential effects on marine species and habitats identified as sensitive in the broader assessment.

Further compounding these issues is the absence of detailed emergency response procedures. The decision to defer contingency planning until after consent prevents the evaluation of whether adequate safeguards will be in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures be assessed prior to granting consent. In cases where this information is absent, 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 shortcomings obstruct a thorough evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application fails to adequately assess the ecological and socio-economic impacts, raising immediate concerns about the protection and maintenance of these vital uses and habitats. A significant issue lies in

the unfounded assumption that fishing activities can simply be displaced without repercussions. The absence of evidence regarding the availability, accessibility, and capacity of alternative fishing grounds is critical, as such displacement could lead to overfishing elsewhere and potentially threaten the livelihoods of the local fishing fleet. The implications for fisheries and local economies cannot be properly understood without a thorough, evidence-based assessment.

Moreover, the proposal poses substantial risks to marine species, particularly due to underwater noise from construction activities. The anticipated high-energy hammer piling over a prolonged period is likely to disrupt a wide area, with notable effects on species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these impacts, lacking the necessary supporting evidence to justify this downplaying.

There exists a contradiction within the application: while it acknowledges the requirement for licences to permit harm to European Protected Species, it simultaneously describes these impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially given that anticipated harm might necessitate legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without an integrated evaluation of these combined effects, it remains impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies regarding evidence of fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies severely undermine the assessment's completeness and reliability. These issues obstruct a thorough evaluation of the impacts on marine life and fisheries, necessitating immediate action to address these critical concerns.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not consider the full impacts of the project as a whole. The offshore turbines and onshore works are linked but are evaluated separately, which leads to a fragmented analysis that obscures the environmental and socio-economic effects.

Onshore works involve cabling across protected moorland, the construction of a

substation near Stornoway, and access routes through sensitive landscapes. These activities include excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive area. The application lacks a comprehensive evaluation of these impacts, making it difficult to understand the overall environmental footprint of the project.

By excluding or postponing the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment requires that all project components are examined together, yet the disconnection between offshore and onshore elements means the combined effects on peatlands, habitats, and communities are not fully acknowledged.

There are significant risks to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place, highlighting a gap in biodiversity protection.

The proposal also brings up concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that opposes the goals of renewable energy development. The application does not adequately address this matter or show that the overall carbon balance is beneficial.

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

From a policy standpoint, the failure to assess the project comprehensively and to show that peatlands, habitats, and land use interests are protected contradicts the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

Overall, the separation of project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, making a lawful determination impossible.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding nocturnal wildlife and dark skies represents a significant gap in the Environmental Impact Assessment. The proposal threatens the West Lewis coastline, known for its remarkably dark skies, which are essential to the region's environmental quality, cultural identity, and potential for tourism, particularly in areas such as astro-tourism. The introduction of permanent red aviation lighting will create a persistent and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. Such an oversight is particularly concerning given the critical role that dark skies play in the area's identity and in the burgeoning tourism sector. The lack of consideration for these impacts results in a significant shortfall in the overall landscape and environmental assessment.

Moreover, there is a notable absence of any evaluation of the effects on nocturnal wildlife, particularly species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are highly sensitive to artificial lighting. This sensitivity can lead to disorientation and an increased risk of collisions. The application fails to include any lighting impact assessment or a phototaxis study, which are essential to understanding how aviation lighting may adversely affect these species or contribute to increased mortality rates.

The ornithological assessment's reliance on daytime survey data further exacerbates this issue, as it does not adequately capture nocturnal activity or the associated risks. Even species like Kittiwakes, which may forage or migrate at night, are at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

Without proper assessment of these nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to rule out any adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and hinders a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4's emphasis on protecting natural places and environmental quality. Additionally, it undermines the wider assessment of landscape and seascape impacts, as the character of the night-time environment is an integral component of the overall setting.

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

TOURISM

The assessment of tourism impacts within the application is significantly lacking and does not adequately consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. The region's tourism is heavily reliant on its wild coastline, nearly untouched landscapes, dark skies, and a feeling of remoteness. Despite the application noting that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contribution.

Tourism in the area has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, and it supports more than 1,000 jobs, accounting for up to 16% of the island's economy. However, the application does not model the potential impacts on Tourism Gross Value Added or the broader economic resilience resulting from the industrialisation of the seascape and the degradation of environmental quality. Without such an analysis, it remains unclear whether the development would provide a net economic benefit or pose a threat to an established and growing sector.

Moreover, the assessment neglects to address the significance of environmental quality in fostering tourism, particularly the value of unspoiled landscapes and dark skies to visitor experiences, along with emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this shortcoming, leading to a considerable gap in the understanding of impacts on an acknowledged and expanding segment of the local economy.

In a community like this island, which has limited economic diversification, the failure to evaluate the impacts on tourism has broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been considered as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity of proving net benefit. Furthermore, it contradicts strategic objectives that recognise tourism as a key growth sector and fails to provide adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that drive visitor behaviour, and acknowledging the island's economic dependencies lead to a significant evidential gap. This undermines the ability to carry out a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the criteria for sustainable development, as 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.

Additional Comments

I strongly object to the vast N4 Spoid Na Mara offshore windfarm on Lewis. The accumulative effect of all of these windfarms on and off shore through Lewis and the Isle of Skye has been so poorly planned with no thought to the local communities affected. Most of the profits will go offshore, little community benefit and residents of Lewis and Skye will still have to pay the highest electricity prices in the UK. Surely much smaller scale community windfarms serve the community better?

N4 conflicts with the Development Plan and NPF4

N4 harms protected seabirds

N4 harms vulnerable and protected marine life, this area should be totally protected from commercial development on this scale.

N4 harms humans living in close proximity, some of the turbines will be 3 miles away from shore.

N4 conflicts with the landscape and character of the West Side of Lewis

N4 harms visual amenity by introducing an industrial scale that clashes with the horizon

N4 conflicts with and threatens tourism. This will potentially harm tourism where beauty spots will change for years to come.

N4 harms dark skies

N4 conflicts with transport capacity

N4 harms heritage and other historic sites, it will be clearly seen from extremely important historic sights on Lewis changing the views from them for the next 30 years.

N4 causes cumulative harm that is long-term and difficult to reverse

N4 conflicts with biodiversity policy

N4 threatens community identity, tradition, and the distinct character of the West Side.

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: 43F06C23

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 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.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is materially inadequate and fails to satisfy the statutory requirements of the Environmental Impact Assessment regime. The application does not provide a structured or reasoned comparison of realistic alternatives based on environmental effects. Instead, it offers a narrative account of project evolution that does not adequately demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

There is a lack of transparent or evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered the option of

placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. Considering the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in determining impact, the failure to conduct such analysis precludes any conclusion that the proposed siting is the least damaging option available.

The deficiencies also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes locations of cultural and spiritual significance, 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 employed, 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 signifies a failure to adhere to the established mitigation hierarchy, thereby obstructing the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a robust alternatives assessment, it cannot be concluded that the proposal aligns with principles of sustainability or is compliant with policy.

From a policy perspective, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to present 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 fails to provide a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This region is biologically active and sensitive, yet the baseline data is inadequate. The methodologies used do not adequately capture species presence, behaviour, and habitat use, which leads to an unsound evidential basis for evaluating impacts.

Specifically, the assessment neglects to properly recognise and assess the presence of otters, a European Protected Species, which actively use coastal areas for foraging and movement. This oversight includes a lack of consideration for their core foraging range and behavioural patterns. Consequently, the potential effects of construction disturbance, noise, and increased activity on this species have not been thoroughly evaluated, undermining claims of negligible effects.

There are also significant deficiencies in the assessment of basking sharks, as reliance on aerial surveys creates a detection bias, particularly in Atlantic conditions. This method likely underestimates the presence of basking sharks, especially compared to

established land-based observations showing frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data hampers meaningful assessments of cumulative and indirect impacts, such as seasonal variations and interactions within the wider ecosystem. This creates uncertainty about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or the National Planning Framework 4, as it has not properly identified or assessed protected species. This uncertainty prevents a definitive exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Therefore, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment regarding the ornithological impacts of the proposed development is fundamentally flawed, with major gaps in evidence and notable inconsistencies that compromise its overall findings. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing declines. However, the application does not adequately demonstrate that these species will remain unaffected, falling short of the necessary evidential standards. Key foraging areas and migratory pathways are directly impacted by the proposed siting of turbines, yet the assessment fails to comprehensively evaluate the risks associated with displacement, collision, or habitat loss.

There is a significant contradiction within the application itself, as the developer claims no substantial adverse effects will occur while simultaneously making a case for derogation under the Habitats Regulations, which is typically warranted only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment, indicating that its conclusions lack support from the evidence it presents. The assessment does not adequately confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The crucial nature of these feeding grounds is not sufficiently acknowledged, and the dependence on modelling techniques introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. Furthermore, the methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and limited understanding of the species' behavioural responses.

The location of the turbines within an established migratory corridor poses an additional and significant risk, as it effectively obstructs a primary flight path used by birds migrating between the United Kingdom and Iceland. The assessment does not sufficiently examine the long-term consequences of potential ongoing mortality within this corridor, nor does it address the impacts on species with comparatively small global populations.

From a regulatory standpoint, the application does not fulfill the evidential requirements to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling constraints, indicates that the standard of proving beyond reasonable scientific doubt has not been met. This activates the precautionary principle, hindering a lawful decision in favour of consent. The identified deficiencies also represent non-compliance with the National Planning Framework 4 concerning the protection of biodiversity and natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely impacted places this proposal in direct opposition to national policy.

Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. Such shortcomings hinder a thorough evaluation of potential impacts and support the overall conclusion that the application fails to meet the necessary statutory criteria for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal under consideration presents significant deficiencies in its assessment of cultural heritage and community identity. It fails to recognise the West Lewis coastline as a living cultural landscape, where the environment, language, tradition, and community are interconnected. Instead, the application adopts a reductive perspective, viewing heritage merely as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

A major shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them as static features. This mischaracterisation neglects their continued use and significance, as well as the potential impact of development on their setting. Consequently, this results in an incomplete evaluation of cultural effects and overlooks their essential role in community life.

Furthermore, the application neglects to consider intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the assessment, representing a significant oversight. The lack of consideration for these factors impedes a proper understanding

of the cultural impact of the development.

There are also substantial concerns regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity akin to that of Indigenous Peoples, has not undergone a process of Free, Prior and Informed Consent. This absence of meaningful engagement calls into question the legitimacy of the assessment and fails to honour established principles of participation concerning cultural and environmental interests.

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

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, along with the disregard for living cultural practices, marks a clear deviation from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

There is also a perception among the community that the proposal poses a direct threat to their identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this, the potential impacts have not been adequately incorporated

into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally flawed and does not sufficiently capture the extent of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by its unobstructed Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, located near the shoreline, would impose a continuous and overpowering industrial presence, which would irrevocably change this character and lead to a permanent transformation of the landscape.

Moreover, the application fails to accurately depict the extent of this visual alteration. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of this impact within the framework of such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. There is evidence that these viewpoints may not fully encompass the

most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the actual magnitude of visual impact has been minimised, which undermines the credibility of the assessment.

Additionally, the analysis neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are embedded within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as standalone entities, overlooking their interdependence and leading to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the experiences related to heritage assets and severing their ties to the natural horizon. This represents not only a visual impact but also a deeper cultural and spatial damage that has not been adequately examined in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which emphasises the need to protect natural places and historic assets. The scale of change proposed is at odds with the requirement to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further diminishes any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and closeness of the turbines, their presence would be overwhelming and inescapable. Consequently, the change is fundamentally permanent, rather than something that could be diminished to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of the construction and pollution risks associated with the proposal is notably deficient, lacking the essential detail needed to evaluate the potential environmental impacts effectively. This project includes substantial seabed preparation and installation within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application relies on vague mitigation and contingency measures that are intended to be developed after consent has been granted, which hampers any meaningful assessment of their adequacy or effectiveness.

The reliance on unspecified future measures raises significant concerns, particularly in

light of the sensitivity of the local environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it remains 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.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate safeguards are established to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess the necessary environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of vital environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and required mitigation measures must be evaluated prior to granting consent; without this information, a lawful determination cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In conclusion, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts collectively indicate that the assessment is materially deficient. These shortcomings inhibit a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure remains notably incomplete, failing to encompass the full range of impacts associated with this integrated project. The interconnection between the offshore turbines and the onshore works is vital; however, they are evaluated separately, leading to a disjointed analysis that obscures the actual environmental and socio-economic consequences.

Among the onshore elements are cabling across protected moorland and the construction of a substation near Stornoway, accompanied by access infrastructure traversing sensitive landscapes. These undertakings involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and

ecologically delicate habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

The decision to exclude or defer the assessment of onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are examined together; however, the distinct treatment of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Risks to sensitive habitats, including machair systems and peatland environments, are significant and should be protected under policy. The application does not adequately demonstrate that impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been implemented, creating a substantial evidential gap concerning biodiversity protection.

Additionally, concerns regarding carbon balance arise from the disturbance of peatland, which releases stored carbon and could lead to a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this aspect and fails to demonstrate that the overall carbon balance is indeed beneficial.

The routing of infrastructure through active croft land introduces potential conflicts with established land use and legal rights. There is insufficient evidence that necessary consents or processes have been initiated, raising doubts about the deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to include an assessment of dark skies and nocturnal wildlife, resulting in a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, visible over great distances, threatens to create a continuous "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Moreover, there is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning as the significance of dark skies is paramount to the area's identity and has implications for emerging tourism sectors like astro-tourism. The absence of these assessments results in a considerable gap in the overall evaluation of landscape and environmental impacts.

Equally important, 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 vulnerable to artificial lighting due to their phototaxis behaviour, which can lead to disorientation and an increased risk of collision. The lack of a lighting impact assessment or phototaxis study means there is no evaluation of how aviation lighting might affect these species or contribute to mortality rates.

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

Without a proper assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard needed to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, thus engaging the precautionary principle and preventing a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and the maintenance of environmental quality. It also diminishes the broader evaluation of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

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

TOURISM

The application inadequately assesses tourism impacts and neglects to evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. The area's tourism is fundamentally reliant on its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is acknowledged that 86% of visitors are attracted by the scenery, yet there is no quantified analysis regarding how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle has seen notable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this progress, the application fails to consider how the industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added or broader economic resilience. Without such an evaluation, it remains unclear whether the proposed development would provide a net economic benefit or threaten an established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality for tourism, particularly the value of unspoiled landscapes and dark skies in enhancing visitor experiences and fostering emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a major gap in understanding the impacts on this acknowledged and growing component of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate impacts on tourism has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been duly examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning 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 assess the economic consequences of the proposal.

Overall, the lack of quantification of tourism impacts, failure to assess environmental influences on visitor behaviour, and disregard for the island's economic dependence culminate in a significant evidential gap. This deficiency 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 demonstrates a significant failure to meet the standards for sustainable development as required by statutory duties, national policy, and evidential standards. It revisits the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This current application is presented under a policy framework that places a stronger emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis for this application. There is incomplete baseline data, an undefined design envelope, unspecified reliance on mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are omitted. The Environmental Impact Assessment is therefore inadequate, lacking the information necessary for a comprehensive

understanding of significant effects or residual impacts.

Additionally, there are clear procedural issues. The failure to conduct a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the lack of 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, rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal remain unclear and may be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively inadequate for determination. The scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent for the application or use the appropriate regulatory provisions to request the submission of the missing information.

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

Additional Comments

Apart from it being wrong on so many levels we should also not be allowing foreign companies and countries bleed our resources dry !

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: E96112FD

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 regimes. The concerns raised are founded upon a careful review of the Environmental Impact Assessment Report and its supporting documentation, which reveal substantial deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The development is situated off the west side of the Isle of Lewis, a region characterised by its stunning Atlantic coastline, near-pristine surroundings, and rich cultural heritage. The dimensions, proximity, and design of this proposal give rise to significant doubts about its alignment with statutory requirements, national policy, and sustainable development principles.

The application notably lacks a sufficient evidential foundation for a lawful decision. There is a concerning absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Additionally, numerous key elements of the proposal remain undefined. The use of a flexible design framework results in an unclear understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their potential effectiveness. Consequently, the documentation fails to furnish a comprehensive and informed view of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are evident and substantial conflicts with policy. The proposal does not appear to comply with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and the wellbeing of the community. It does not establish that the national obligations to safeguard biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly impact the statutory tests essential for granting consent and weaken the authority's capacity to deem the development acceptable from a policy perspective.

Furthermore, the scale of the proposal is unprecedented for this particular location, with large turbines proposed in close proximity to the shoreline. This raises significant worries regarding the landscape's capacity, visual dominance, and potential environmental repercussions. Collectively, the lack of sufficient information, dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy suggest that the application is incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposal significantly underrepresents the cultural heritage and community identity associated with the West Lewis coastline. This region is not merely a collection of static assets but a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow perspective, failing to recognise the ongoing social, cultural, and spiritual roles that heritage sites play within the community.

Particularly concerning is the treatment of key 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 inaccurately classified as static features in the assessment. This oversight neglects their continued significance and the potential impacts of development on their surroundings, leading to a limited understanding of the cultural effects and their importance in community life.

Furthermore, the assessment disregards the intangible aspects of cultural heritage, including the Gaelic language and local traditions, as well as the longstanding relationship the community shares with the coastal environment. These elements are vital to the identity of the area, but they are entirely omitted from the evaluation, representing a major oversight. The cultural impacts of the development cannot be adequately assessed without incorporating these factors.

There are additional concerns about community rights and engagement, particularly regarding the Gaelic-speaking population, which embodies a distinct cultural identity characteristic of an Indigenous People. The absence of a process for Free, Prior and Informed Consent raises questions about the validity of the assessment and fails to align with established principles of meaningful participation in decisions that affect cultural and environmental interests.

Moreover, the lack of a compliant Island Communities Impact Assessment is a significant procedural failure. Under the Islands (Scotland) Act 2018, this assessment is a statutory requirement that allows the competent authority to fulfil its legal obligation to consider the social, cultural, and economic impacts on the island community. The absence of this critical evaluation precludes a lawful determination of the proposal.

From a policy standpoint, the identified deficiencies contradict the National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, marks a clear deviation from policy mandates.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential gap. The cultural impacts associated with the proposed development remain inadequately evaluated, and the application does not furnish a sufficient basis for understanding the true cultural costs involved.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include any evaluation of dark skies and nocturnal wildlife, which represents a significant omission. The coastline of West Lewis is known for its exceptionally dark skies, an essential aspect of its environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that is visible over extensive distances, resulting in a continuous and intrusive “wall of light” effect on the western horizon that would drastically change the night-time environment.

There is no consideration of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to address these factors highlights a clear gap in the overall landscape and environmental assessment.

Moreover, the application neglects to evaluate the impacts of this lighting on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can result in disorientation and a higher risk of collisions. Without a dedicated lighting impact assessment or phototaxis study, the application does not assess how the proposed aviation lighting could affect these species or potentially increase their mortality rates.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activities and associated risks. Kittiwakes, for example, may forage or migrate at night and are susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it remains unclear whether protected species or designated sites may face adverse effects. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering lawful determination.

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

In summary, the absence of any assessment regarding dark skies and nocturnal wildlife

represents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The application lacks a thorough assessment of tourism impacts, neglecting the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism heavily relies on the area's wild coastline, nearly pristine landscape, dark skies, and sense of remoteness. Notably, 86% of visitors are attracted by the scenery, yet the application fails to provide a quantified evaluation of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and accounting for as much as 16% of the island's economy. However, the application does not model the potential impacts of seascape industrialisation and environmental quality loss on Tourism Gross Value Added or overall economic resilience. The lack of such an analysis leaves uncertainty regarding whether the development would yield a net economic benefit or jeopardise a vital and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in enhancing tourism, including the value of unspoiled landscapes and dark skies for visitor experiences and the growing markets of nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a considerable gap in understanding the impacts on a recognised and developing segment of the local economy.

In a context where the island community has limited economic diversification, the neglect of tourism impacts carries broader implications for employment, local businesses, and community sustainability. Furthermore, the lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

In summary, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and consider the island's economic dependency culminates in a significant evidential gap. This deficiency hinders a robust evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the standards of sustainable development as mandated by statutory duties and national policy. It mirrors the core problems that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite the current application being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

Crucially, the application lacks a comprehensive and reliable evidential basis. It contains significant gaps in baseline data, utilises an undefined design envelope, and depends on unspecified mitigation measures. Additionally, it omits vital impact pathways, including nocturnal wildlife, the full scope of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is insufficient, leaving the potential significant effects and residual impacts inadequately understood.

There are also evident procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, while the omission of a complete Social Impact Assessment constitutes a critical gap. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it validate that health and wellbeing impacts are acceptable. Furthermore, it fails to show a net economic benefit because of the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, thus obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties persist regarding environmental risks, which could be significant. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The myriad information deficiencies, paired with conflicts in policy and unresolved environmental risks, obstruct any lawful and evidence-based decision-making. The competent authority must therefore refuse consent on these grounds or invoke the

relevant regulatory provisions to mandate the submission of the outstanding information.

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

Additional Comments

I am really unhappy about this proposed windfarm so close to the coast of Lewis. I am concerned about the visual impact for residents and tourists as the coastal areas are outstanding in their beauty and currently unspoiled. The ancient historical sites in Lewis close to this proposal, are renowned throughout the world and unique and very special. The landscape around Lewis and its ancient history needs to be protected, now and for future generations, and not exploited for commercial gain. The extreme height of the turbines is concerning also and the loss of dark sky beauty would be a tragedy. I am not against renewable energy entirely, but the sites have to be chosen wisely, with the utmost respect for nature and the residents who live nearby. Having visited this area several times I can appreciate how easy it would be to irreversibly damage the precious ecosystems and environmental equilibria. Please refuse this application and ask for it to be scaled down and also sited elsewhere.

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: 2318AA38

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. Our concerns stem from a thorough review of the Environmental Impact Assessment Report and supporting documentation, revealing significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural integrity. The development site is situated off the west side of the Isle of Lewis, known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the proposal raise profound questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for lawful determination. Important environmental data is absent, baseline information is limited and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework used inhibits a clear assessment of likely significant effects, while reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation does not allow for a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

Moreover, there are evident and substantial policy conflicts. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts are directly related to the statutory tests required for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of this proposal, with large turbines positioned near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy underscores the application's incompleteness, rendering it incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies in the Environmental Impact Assessment Report are significant and cannot be overlooked. A major concern is the reliance on a flexible Project Design Envelope that lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and undermines the assessment's integrity, leading to a situation where the presented impacts may not accurately represent the eventual development. As a result, the public and the competent authority are unable to grasp the true environmental effects of the proposal.

Furthermore, the application places a heavy emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental harm will be mitigated later is unacceptable and does not allow for a meaningful evaluation of effectiveness or an assessment of any residual impacts. This postponement of essential information until post-consent stages contradicts the very purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures be clearly established before any determination is made.

Additionally, there are considerable evidential deficiencies present, including gaps in baseline data and limitations in the employed methodology, which rely on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of the impacts, especially where conclusions indicating negligible or non-significant effects are drawn without sufficient supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot align with statutory requirements.

The application fails to meet the evidential threshold set by the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly in relation to protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data ultimately renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, putting the competent authority in a position where it cannot make a well-informed determination based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime, as it does not provide a structured, reasoned comparison of realistic alternatives based on environmental effects. Instead, it presents a narrative account of project evolution, which does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging

solutions.

There is no evidence-based comparison of 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 impacts related to visual, ecological, and coastal issues would likely be mitigated. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in determining impact, the lack of such analysis means it cannot be concluded that the proposed siting is the least damaging option.

The deficiencies also extend to cable routing and landfall assessment, where there is a lack of evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear avoidance strategy and the lack of comparative analysis indicate that mitigation by design has not been considered, with the proposal relying instead on post-design mitigation measures.

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

From a policy standpoint, this lack of thoroughness undermines compliance with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is significant, 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 presented in the application concerning marine ecology and protected species is inadequate and fails to offer a thorough 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 provided is incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise or evaluate their active utilisation of coastal regions for foraging and movement. The absence of consideration regarding their core foraging range and behavioural patterns results in an inadequate assessment of the potential effects arising from construction disturbances,

noise, and increased human activity. This deficiency undermines any conclusions drawn about the absence of significant effects on this species.

The assessment of basking sharks also reveals critical shortcomings, particularly due to the reliance on aerial surveys that create significant detection bias in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The omission of relevant data and the failure to properly consider such information contribute to an incomplete baseline, thus compromising the reliability of the conclusions drawn.

These methodological shortcomings mean that conclusions asserting negligible or non-significant effects rely on assumptions rather than solid evidence. The lack of sufficient baseline data further hinders meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty surrounding the actual level of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime or National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies precludes the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, consent for the application cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to demonstrate to the necessary evidential standard that internationally important seabird populations on the west coast of the Isle of Lewis, which are already in decline, will not be adversely affected. The proposed development is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

A key contradiction arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only needed in scenarios where significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions presented are not backed by the underlying evidence. The assessment also lacks sufficient evidence to support the claim that seabirds associated with protected sites, such as the Lewis Peatlands and St

Kilda, will remain unaffected. The assessment does not adequately account for the significance of these feeding grounds, and the reliance on modelling approaches introduces uncertainty, especially for severely declining species like Kittiwakes and Fulmars. The methodologies applied are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not comprehensively understood.

The placement of turbines within a recognised migratory corridor poses an additional risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality in this corridor or the potential effects on species with smaller global populations.

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

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

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and inadequate evidence. These shortcomings hinder a thorough evaluation of impacts, leading to 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 fundamentally lacking, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community intertwine. The application employs a narrow perspective, treating heritage merely as a collection of static features instead of recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the assessment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual activities, yet they are regarded as unchanging elements, neglecting their continued significance and the implications of development on their surroundings. This misrepresentation leads to an inadequate understanding of cultural impacts and dismisses their importance in community life.

Moreover, the assessment disregards intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and

the coastal environment. These aspects are vital to the area's identity but are conspicuously absent from the evaluation, representing a critical gap. Without acknowledging these factors, the true cultural implications of the proposed development remain obscured.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking community has a distinct cultural identity, characterised as an Indigenous People, yet the necessary process of Free, Prior and Informed Consent has not been undertaken. This lack of genuine engagement compromises the credibility of the assessment and fails to align with established principles concerning participation in decisions that affect cultural and environmental matters.

Another major oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This evaluation is essential for the competent authority to legally assess the social, cultural, and economic repercussions on the island community. Its absence alone prevents a lawful consideration of the proposal.

From a policy standpoint, these inadequacies place the development in direct opposition to the National Planning Framework 4, especially regarding the preservation of historic assets and sites. The failure to account for both tangible and intangible heritage, as well as to recognise active cultural practices, signifies a blatant disregard for policy stipulations.

Overall, the neglect to evaluate living heritage, intangible cultural values, community rights, and compliance with statutory obligations results in a substantial evidential void. The cultural repercussions of the development have not been adequately examined, leaving the application without a sufficient foundation for assessing the genuine cultural consequences of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap. This omission prevents both the public and the competent authority from comprehensively understanding the social risks identified through the developer's own research.

Available summaries suggest that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been derived from direct engagement with the community and are not merely speculative. Nevertheless, the lack of disclosure regarding the full assessment limits scrutiny of the findings and the ability to gauge their significance in the decision-making process.

There is also evidence indicating that the proposal poses a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this,

such impacts have not been fully integrated into the main application or adequately considered. The withholding of the complete Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this scale, especially when community character and functioning may be affected. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and prevent harm, yet the available evidence points to existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy remains unproven.

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

In summary, the non-disclosure of the complete Social Impact Assessment, along with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation hinders a lawful determination and reinforces the conclusion that the application lacks sufficient information to be supported.

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

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

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

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

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

In summary, the lack of clearly defined mitigation measures, detailed management plans, and clarity on potential impacts contributes to a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the notion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

Moreover, the proposal introduces considerable risks to marine species, predominantly due to underwater noise produced during construction activities. The anticipated high-energy hammer piling over a prolonged duration poses the risk of widespread

disturbance, potentially impacting species such as dolphins. The projected disruption to a substantial segment of the local bottlenose dolphin population raises serious concerns, yet the application tends to downplay the gravity of these effects without sufficient corroborating evidence.

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

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

From a policy standpoint, the application does not convincingly demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avert unacceptable impacts on marine biodiversity, which hinders any conclusion regarding the proposal's alignment with sustainable development principles.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure associated with this project is fundamentally flawed and fails to capture the full range of impacts from what constitutes a single, integrated initiative. The offshore turbines are closely linked to the onshore works, yet these elements are assessed in isolation. This disjointed analysis obscures the true scale of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the creation of access routes through sensitive landscapes. Significant excavation across deep peat areas, especially within Barvas Moor, which serves as an important carbon store and ecologically fragile habitat, is also part of these works. The lack of a thorough assessment of these impacts hinders a comprehensive understanding of the project's overall environmental footprint.

The omission of onshore impact assessments prevents an accurate evaluation of cumulative effects. According to the Environmental Impact Assessment process, all

elements of a project should be examined collectively. However, the distinct separation of offshore and onshore aspects leads to a lack of clarity regarding 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 safeguarded by policy. The proposal does not sufficiently demonstrate that impacts on these habitats have been thoroughly evaluated or that suitable avoidance strategies have been implemented, resulting in a clear evidential void concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application fails to provide proof that the requisite consents or processes are underway, which calls into question the feasibility and lawful execution of the project.

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

In summary, the fragmented assessment of project components, the absence of a comprehensive evaluation, and the lack of evidence regarding environmental and land use impacts render this section of the application incomplete and untrustworthy, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is noted for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that will be visible over considerable distances, creating a disruptive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There is a significant omission in the Environmental Impact Assessment, as it does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This gap is critical, especially considering the growing importance of dark skies to the area's identity and sectors like astro-tourism.

Moreover, the absence of any evaluation regarding nocturnal wildlife is alarming. Notable 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 a heightened risk of collision. The application fails to provide a lighting impact assessment or a phototaxis study, neglecting to consider how aviation lighting may adversely affect these species or potentially increase mortality rates.

This issue is exacerbated by the reliance on daytime survey data within the

ornithological assessment, which fails to capture the nocturnal activity and risks associated with species like Kittiwakes that may forage or migrate at night. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts of the proposed development.

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

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality, further undermining the overall landscape and seascape impact evaluation, as the character of night-time is an essential component of the environment.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife represents a substantial 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 regarding tourism impacts is severely inadequate and does not adequately evaluate the economic and social repercussions for a crucial part of the Isle of Lewis's economy. The island's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are vital to tourism, which thrives on these natural attributes. The application recognises that 86% of visitors are attracted by the scenery, yet it neglects to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

Tourism has seen remarkable growth, rising from £65 million in 2017 to more than £81.5 million, while also supporting over 1,000 jobs and making up to 16% of the island's economy. However, the application does not assess how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or harm an established and flourishing sector.

The assessment further neglects to recognise the crucial role of environmental quality in tourism, particularly the significance of unspoiled landscapes and dark skies for visitor satisfaction and the growth of niche markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this deficiency, leaving a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

Given the island community's limited economic diversification, the lack of assessment regarding tourism impacts has broader implications for employment, local businesses,

and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and recognising the island's economic dependency create a significant evidential gap. This 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 fundamentally fails to meet the requirements for sustainable development when evaluated against statutory obligations, national policies, and evidential standards. The application revisits core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new proposal is being considered under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis provided for the determination of this application. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of essential impact pathways, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or any residual impacts.

Furthermore, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment constitutes a significant 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 contradicts the National Planning Framework 4 by failing to demonstrate the protection of biodiversity, natural spaces, and cultural heritage. It does not adequately address health and wellbeing impacts and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been appropriately assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks persist, as 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 remains unmet, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

The protection of the Scottish Highlands and its marine coast is essential for Scots generations now and future these so called green energy developments are not thought through on many levels.

The ecological environment is destroyed never to recover.

Wildlife affected similarly.

Turbine blades onshore and offshore destroying valuable birdlife in addition to emitting damaging noise levels both onshore and offshore affecting all wildlife.

This installation like many others is unnecessary for Scotland, the power generated is exported, with no benefit to the Scottish people.

Rural areas already affected or planned, have left residents unable to sell their homes at market rate.

The increased construction traffic to and from the site causes significant disruption with accompanying dangers with traffic volumes.

Tourism is also a large concern. Tourists come to the Highlands to see the unspoilt beauty, not large turbines on every hillcrest!

Finally, this technology will never have the capability of providing 24/7 uninterrupted power supply for residents and industry.

The evidence is already being seen around the world. These projects are a scam built on subsidies.

I wholeheartedly object to this proposal.

[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: 65272FAE

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

Dear Sir/Madam

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

An adequate evidential basis for a lawful determination is notably absent. Critical environmental data has not been provided, baseline information is limited and inconsistent, and important aspects of the proposal remain undefined. The application employs a flexible design framework, which hinders a clear understanding of potential significant effects. Furthermore, there is reliance on unspecified mitigation measures, which prevents assessment of their effectiveness. Consequently, the documentation does not allow for a comprehensive understanding of environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsupported by robust evidence.

Substantive policy conflicts are evident. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not satisfactorily demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These issues directly affect the statutory tests required for consent and hinder the competent authority's ability to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal in this location, with large turbines placed near the shoreline, raises serious concerns related to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and does not deliver a complete, transparent, or reliable analysis of the potential environmental

consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to defined turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the application of a worst-case scenario. This deficiency undermines the assessment's integrity, resulting in a situation where the impacts outlined may not represent the actual development built. Consequently, both the public and the competent authority are left unable to grasp the true extent of the environmental effects.

The application leans significantly on mitigation measures, monitoring strategies, and management plans that remain unspecified. Seeking consent under the assumption that environmental harm will be addressed later obstructs a meaningful evaluation of their effectiveness or an assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations be clearly defined prior to determination.

There are also notable evidential shortcomings, including inadequate baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such gaps lead to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without solid supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, introducing a scientific uncertainty that fails to comply with statutory requirements.

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

When considered collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These flaws obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to reach a decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives, failing to meet the statutory requirements set out in the Environmental Impact Assessment regime. It lacks a structured comparison of realistic alternatives based on environmental effects, instead presenting a narrative of project evolution. This method does not confirm that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is no clear, evidence-based comparison of alternative offshore locations, development scales, or design configurations. Specifically, the application does not show 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 particularly sensitive, and the significance of proximity to shore in determining impact means that the absence of such analysis makes it impossible to conclude that the proposed location is the least damaging option.

The deficiencies in the application extend to cable routing and landfall assessment as well, with insufficient evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive areas. This includes places of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis indicate that mitigation by design has not been employed, relying instead on measures after the design phase.

Consequently, the application fails to show that environmental harm has been minimised through the choice of site, layout, and routing of infrastructure. This indicates a failure to adhere to the established mitigation hierarchy and prevents the competent authority from determining whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is a sustainable or compliant solution.

From a policy viewpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight 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 assessment of marine ecology and protected species is fraught with significant deficiencies, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal environment. This region is recognised as a sensitive and biologically active marine system, yet the baseline data provided is insufficient. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of the species within this ecosystem. As a consequence, the assessment does not furnish a credible evidential basis for evaluating potential impacts.

A critical oversight involves otters, which are classified as a European Protected Species. The application neglects to appropriately recognise and assess their active utilisation of coastal areas for foraging and movement. This omission regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly evaluated. Such shortcomings undermine any assertions regarding the absence of significant effects on this species.

Further issues emerge in the evaluation of basking sharks, as the reliance on aerial surveys introduces notable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider this data results in a deficient baseline, thereby weakening the reliability of the conclusions presented.

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

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or evaluated. The level of uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Under these conditions, it is clear that consent cannot be lawfully granted.

Ultimately, the amalgamation of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies impede a thorough evaluation of impacts on marine ecology and protected species, contributing to the overarching conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment concerning the ornithological implications of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its conclusions. Located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally significant seabird populations, the application fails to adequately demonstrate that these species will not face adverse effects. Despite acknowledging that seabird populations are already in decline, the assessment does not robustly evaluate critical factors such as displacement, collision risk, or habitat loss.

Moreover, a serious contradiction arises within the application. While the developer asserts that there will be no significant adverse effects, they simultaneously propose a Habitats Regulations derogation case, which is necessitated only where significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented.

The evidence regarding seabirds linked to protected sites, including the Lewis

Peatlands and St Kilda, is insufficient to assure that these species will remain unaffected. The significance of these crucial feeding grounds is not adequately considered, and the reliance on modelling techniques introduces uncertainty, particularly for vulnerable species such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly when baseline data is lacking and behavioural responses are not fully comprehended.

Additionally, the placement of turbines within a recognised migratory corridor introduces a considerable risk, effectively obstructing a primary flight path utilized by species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term repercussions of sustained mortality within this corridor or the potential impact on species with small global populations.

From a regulatory standpoint, the application fails 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, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This scenario invokes the precautionary principle, thereby obstructing a lawful conclusion in support of the proposed consent.

The identified deficiencies also represent a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not experience adverse effects places the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to adequately recognise the West Lewis coastline as a dynamic cultural landscape, interlinking environment, language, tradition, and community. It adopts a reductive stance, viewing heritage merely as static assets while neglecting their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is found in the treatment of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and places of spiritual practice, yet they are mischaracterised as static features. This oversight fails to acknowledge their continuing use and meaning, resulting in an incomplete understanding of cultural effects and disregarding their importance within community life.

Furthermore, the assessment neglects intangible cultural heritage, such as the Gaelic language and local traditions, along with the long-standing relationship between the

community and the coastal environment. These elements are crucial to the area's identity but have been omitted from the evaluation, creating a substantial gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as possessing a unique cultural identity similar to Indigenous Peoples, has not been engaged in a Free, Prior and Informed Consent process. The lack of meaningful engagement undermines the assessment's credibility and fails to adhere to principles of participation that should guide decisions impacting cultural and environmental interests.

Moreover, 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 is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community, which alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from policy stipulations.

In summary, the lack of assessment regarding living heritage, intangible cultural values, community rights, and statutory requirements creates a significant evidential gap. The cultural ramifications of the development have not been sufficiently evaluated, and the application does not establish a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a critical issue that compromises the integrity of the planning application. The developer's own focus groups with local residents indicate that there are measurable levels of stress, anxiety, and concern regarding the proposal's scale and proximity. These impacts, derived from direct engagement, highlight an ongoing situation that cannot be dismissed as speculative. However, the absence of the full report hampers the ability of both the public and the competent authority to understand the comprehensive social risks identified.

This lack of transparency also extends to the perceived threat the proposal poses to community identity and cohesion, with "cultural loss" explicitly mentioned in the developer's findings. Yet, these serious concerns have not been adequately reflected in the main application, nor have they been given the attention they warrant. By withholding the complete Social Impact Assessment, the true human and social costs associated with the development remain obscured.

The implications for the Environmental Impact Assessment process are profound. A thorough understanding of the social, economic, and health impacts is essential for developments of this magnitude, especially when considering potential effects on community character and functioning. Without access to the full dataset, the application lacks a robust evidential foundation for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not comply with the National Planning Framework 4 regarding health and wellbeing. It is imperative for developments to support positive health outcomes and mitigate harm. The existing evidence of adverse effects, which has not been fully disclosed, calls into question the application's adherence to this policy.

Furthermore, the procedural ramifications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This oversight represents a material omission in the application and constitutes a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

Overall, the failure to disclose the full Social Impact Assessment, coupled with clear evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation undermines the possibility of a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not sufficiently capture the extent of change or the sensitivity of the environment involved. The character of the West Lewis coastline is shaped by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, would establish an industrial presence that is continuous and dominant, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to represent the scale of visual change accurately. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. This level of impact and its significance in the context of such a sensitive landscape has not been properly conveyed.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not adequately depict the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This deficiency introduces a risk that the magnitude of visual impact has been understated, thereby calling into question the reliability of the assessment.

Another significant shortcoming is the lack of evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to acknowledge their interdependence, which results in an incomplete understanding of the impacts on their settings and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The level of change proposed is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any claims of compliance with policy.

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

In conclusion, the assessment inadequately represents the magnitude of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and bolster the argument that the proposal is incompatible with the protection of this valuable landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive to sediment disturbance and contamination. The proposed development involves significant seabed preparation and installation works within a challenging Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the detail necessary for evaluating potential environmental effects. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the proposal. Instead, it relies on mitigation and contingency measures that are to be formulated after consent has been granted. This reliance on undefined future measures is particularly troubling given the ecological sensitivity of the area.

The application acknowledges various risks, such as sediment mobilisation and accidental chemical or oil spills, but fails to provide adequate detail on preventive, control, or monitoring strategies. There is considerable uncertainty surrounding the

scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological implications of these potential impacts. This uncertainty extends to the marine species and habitats identified as sensitive within the broader assessment context.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application denies the opportunity to evaluate whether suitable safeguards are established to address pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is mandated that significant likely effects and mitigation strategies be evaluated prior to consent. The absence of this information means a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with the policy requirements regarding environmental protection and water quality.

In summary, the lack of specified mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts all contribute to a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks and further reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of the marine environment and fisheries, which are critical to both local ecology and economy. The West Lewis coast is home to a varied marine ecosystem and supports an active fishing industry, yet the application does not adequately address how these vital uses and habitats will be preserved without considerable disruption.

One major concern is the assumption that fishing activities can be shifted without negative repercussions. There is no evidence provided to suggest that alternative fishing grounds exist that are accessible and capable of absorbing the additional pressure resulting from displacement. This critical gap in information raises the risk of overfishing in other areas, potentially leading to wider economic ramifications for the local fishing fleet. Consequently, without a detailed, evidence-based assessment, the potential impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal poses serious risks to marine species, particularly due to the underwater noise associated with construction activities. The prolonged use of high-energy hammer piling is anticipated to create disturbances over extensive areas, adversely affecting marine life, including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is a serious concern, yet

the application minimizes these potential effects and lacks sufficient supporting evidence for such claims.

An inconsistency in the application arises from the acknowledgment of the need for licenses to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction raises doubts about the validity of the assessment and casts a shadow over compliance with the Habitats Regulations, especially where harm is predicted to an extent that necessitates legal authorization.

Additionally, the cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities, are not sufficiently considered. A comprehensive evaluation of these combined effects is essential for understanding the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It does not convincingly establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby hindering any assertion that the proposal aligns with sustainable development principles.

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application collectively render the assessment both incomplete and unreliable. These deficiencies obstruct a thorough evaluation of the potential 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 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 tourism sector on the Isle of Lewis plays a vital role in the local economy, having expanded from £65 million in 2017 to over £81.5 million, generating more than 1,000 jobs and constituting up to 16% of the island's economy. However, the application in question exhibits a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social repercussions for this key sector. Despite the application's acknowledgment that 86% of visitors are attracted by the area's scenery, 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.

Furthermore, the assessment does not address the critical role of environmental quality in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and supporting emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding the potential impacts on an acknowledged and expanding segment of the local economy.

The implications of the inadequate assessment extend to the wider community, given the island's limited economic diversification. The failure to consider tourism impacts raises concerns regarding employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been thoroughly evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National

Planning Framework 4, particularly concerning economic impact and the requirement to provide evidence of net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector, thereby lacking the necessary information for the competent authority to adequately assess the economic implications of the proposal.

Overall, the deficiencies in quantifying tourism impacts, analysing environmental factors that drive visitor behaviour, and acknowledging the island's economic dependency culminate in a significant evidential void. This gap obstructs a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

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

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

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

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

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

necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

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

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

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

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: 1D539FF5

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline and rich cultural identity. Concerns arise from the scale, proximity, and design of the wind farm, raising questions about its alignment with statutory requirements, national policy, and sustainable development principles.

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

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

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

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives and fails to meet the statutory requirements of the Environmental Impact Assessment. Instead of providing a structured comparison of realistic alternatives based on environmental effects, it offers

a narrative about the project's evolution. This method does not prove that less harmful options have been properly identified, assessed, and chosen over more damaging ones.

There is a lack of transparent and evidence-based comparisons of various offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be reduced. The sensitivity of the West Lewis coastline and the importance of proximity to shore in assessing impact highlight the need for this analysis, which is currently absent.

The deficiencies also affect cable routing and landfall assessment. There is insufficient evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been considered, relying instead on post-design measures.

Due to these shortcomings, the application does not demonstrate that environmental harm has been minimised through the selection of site, layout, and infrastructure routing. This indicates a failure to follow the established mitigation hierarchy, which prevents the competent authority from determining if less harmful and more suitable alternatives are available. Without a robust alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with policy.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment 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 application is fundamentally flawed in its ornithological assessment, which suffers from significant evidence gaps and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already facing decline. However, the application fails to provide the necessary evidence to show that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the proposed development, yet the assessment does not thoroughly evaluate critical issues such as displacement, collision risk, or habitat loss.

A serious contradiction is evident in the application, as the developer asserts no significant adverse effects while also arguing a case for Habitats Regulations derogation, a process that is only invoked when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions are not substantiated by the evidence presented. Furthermore, the assessment does not adequately demonstrate that seabirds linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The importance of their

feeding grounds is not comprehensively addressed, and the reliance on modelling techniques introduces uncertainty, particularly for vulnerable species such as Kittiwakes and Fulmars. The methodologies employed appear likely to underestimate mortality rates, especially when baseline data is incomplete and species behaviours are not fully understood.

The location of turbines within a recognised migratory corridor poses another serious risk, creating a barrier along a primary flight path for birds migrating between the United Kingdom and Iceland. The application lacks a thorough examination of the long-term consequences of ongoing mortality in this corridor and does not consider the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application fails to 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 deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This triggers the precautionary principle, thus hindering any lawful conclusion that could support consent.

Collectively, these deficiencies represent a significant failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to conclusively demonstrate that internationally important seabird populations will not face adverse effects places the proposal in direct conflict with national policy. Overall, the assessment's unreliability stems from its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage assessment associated with this application is fundamentally flawed and overlooks the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than recognising the ongoing social, cultural, and spiritual significance of heritage, the application takes a reductive stance, treating heritage as merely isolated, static assets.

Particularly concerning is the inadequate treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are actively used for burial and spiritual practices, yet the assessment wrongly categorises them as static features, neglecting their ongoing use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores their importance in community life.

Moreover, the assessment fails to consider intangible cultural heritage, including the Gaelic language and traditions, along with the long-established relationship between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely overlooked, representing a significant gap in understanding the cultural impact of the development.

There are serious concerns regarding community rights and engagement as well. The Gaelic-speaking population, possessing a unique cultural identity recognised as characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement diminishes the credibility of the assessment and does not adhere to established principles of participation in matters affecting cultural and environmental interests.

Crucially, the absence of a compliant Island Communities Impact Assessment represents a significant procedural failure, violating statutory requirements under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic repercussions on the island community, rendering any determination unlawful.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, indicates a clear deviation from policy stipulations.

In summation, the lack of evaluation regarding living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a significant evidential gap. The cultural ramifications of the development have not been adequately assessed, and the application lacks a robust foundation for appraising the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of publication of the full Social Impact Assessment commissioned by the developer represents a significant evidential gap. This omission prevents both the public and the competent authority from fully understanding the social risks identified through the developer's own research, hindering proper scrutiny of the findings. Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are derived from direct engagement, not speculation, yet the withholding of the full assessment limits the ability to determine their significance within the decision-making process.

Additionally, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these impacts have not been adequately integrated into the main application or given the appropriate weight. The non-disclosure of the full Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is essential for developments of this scale, especially when community character and

functioning may be affected. Without the full dataset, the application fails to provide a complete evidential basis for assessing the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and avoids harm. However, the available evidence indicates existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance with this policy.

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

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and underscores the conclusion that the application lacks sufficient information for proper consideration.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped character, and a strong sense of remoteness. The proposal to introduce large-scale turbines near the shoreline poses a significant risk of transforming this landscape into an industrial setting, fundamentally altering its character and resulting in a permanent and irreversible change. The assessment of seascape, landscape, and visual impacts associated with this application is severely deficient, failing to accurately reflect both the scale of change and the sensitivity of the receiving environment.

There is an inadequate representation of the visual impact stemming from the turbines' size and proximity to residential areas, historic sites, and popular coastal locations. This is likely to dominate views, directly affecting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment neglects to convey the significance of these impacts within such a sensitive landscape context.

Furthermore, there are methodological flaws in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, particularly regarding cultural heritage sites and valued landscapes. This raises concerns about the potential understatement of visual impacts, which undermines the overall reliability of the assessment.

The evaluation also fails to account for the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their landscape setting, with visual and spatial relationships that connect them to the Atlantic horizon.

The application treats these heritage assets as isolated rather than recognising their interdependence, leading to an incomplete analysis of the impact on their setting and cultural importance.

Industrialisation of the seascape would disrupt these relationships, altering the experience of heritage assets and their connection to the natural horizon. This is not merely a visual issue but represents a broader cultural and spatial harm that has not been adequately assessed.

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The extent of change proposed is incompatible with the necessary safeguarding of landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of compliance with policy requirements.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence will be dominant and unavoidable, resulting in a fundamental and permanent change that cannot be reduced to an acceptable level through any proposed mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns due to the incomplete assessment of construction and pollution risks, failing to provide the necessary detail to fully evaluate likely environmental effects. With substantial seabed preparation and installation works planned in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. The application's reliance on mitigation and contingency measures that are to be prepared post-consent effectively thwarts any meaningful assessment of their adequacy or effectiveness.

This lack of clarity 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 at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

Additionally, there remains 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 such impacts. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application undermines the opportunity for evaluating whether the necessary safeguards are in place to adequately respond to pollution events. This procedural risk complicates the assessment by the competent authority concerning environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards stands in direct conflict with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and necessary mitigation be assessed prior to consent; without such information, a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These significant shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the assessment of fisheries and marine life associated with the application is insufficient and does not provide a robust evaluation of ecological or socio-economic impacts. A critical concern is the flawed assumption that fishing activity can be displaced without consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of supporting the additional pressure that displacement would create. This oversight is significant as it risks overfishing in other areas and could lead to broader economic repercussions for the local fleet. The lack of a clear and evidence-based assessment means that the impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal introduces considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to disturb a wide range of marine life, including species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the significance of these effects without providing sufficient supporting evidence.

Inconsistencies within the application are also notable. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes

the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation. Furthermore, the assessment does not take into account cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and fishing displacement. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be properly determined.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which prevents any conclusion that the proposal reflects sustainable development. In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies collectively render the assessment incomplete and unreliable. These deficiencies hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development involves onshore infrastructure that is fundamentally linked to offshore turbines; however, the assessment of these elements is materially incomplete. This separation results in a fragmented analysis that fails to capture the full extent of environmental and socio-economic impacts, obscuring the project's overall footprint. The onshore components comprise cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access infrastructure through sensitive landscapes, specifically involving excavation in areas of deep peat, notably within Barvas Moor, which is both a significant carbon store and an ecologically sensitive habitat.

The application neglects to provide a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's environmental consequences. By deferring or excluding evaluations of onshore impacts, the assessment limits the analysis of cumulative effects, which is a requisite of the Environmental Impact Assessment process. The separate evaluations of offshore and onshore components fail to fully comprehend the combined effects on peatlands, habitats, and local communities.

Moreover, there are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not satisfactorily demonstrate that impacts on these habitats have been thoroughly evaluated or that sufficient avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

The proposal further raises issues pertaining to carbon balance, as the disturbance of peatland may release stored carbon and create a carbon debt, which contradicts the objectives associated with renewable energy initiatives. The application does not

sufficiently address this concern nor does it show that the overall carbon balance is maintained in a beneficial manner.

Furthermore, routing infrastructure through active croft land presents potential conflicts with existing land uses and legal rights. The application lacks evidence that necessary consents or processes have been initiated, leading to uncertainties regarding both deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and demonstrate adequate 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 adverse impacts can be avoided or mitigated further undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The assessment fails to address the impacts of dark skies and nocturnal wildlife, marking a significant omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, creates a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment.

Additionally, the application does not evaluate how this lighting might affect visual amenity, landscape character, or the experiences of both residents and visitors. The importance of dark skies to the region's identity and the emerging astro-tourism sector heightens the significance of this oversight, leading to a clear gap in the overall landscape and environmental assessment.

More importantly, there is a lack of assessment concerning the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application fails to include any lighting impact assessment or a phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the associated risk of increased mortality.

This lack of evaluation is worsened by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or the risks that accompany it. Species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this has not been assessed. Consequently, the absence of site-specific night-time data creates a crucial

gap in understanding the ecological impacts.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, they undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecology.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife constitutes a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot adequately support a lawful determination.

TOURISM

The evaluation of tourism impacts is inadequate and neglects to consider the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism sector has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, and supports more than 1,000 jobs while representing up to 16% of the island's economy. Despite this, the application fails to analyse how the industrialisation of the seascape and the deterioration of environmental quality would affect Tourism Gross Value Added or the resilience of the wider economy.

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

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to

show net benefit. It conflicts with strategic objectives that recognise tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the combination of unquantified tourism impacts, an inadequate assessment of environmental factors influencing visitor behaviour, and a lack of consideration for the island's economic dependency creates a significant evidential gap. This deficiency hinders a thorough evaluation of economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a critical failure to meet the standards of sustainable development when evaluated against statutory requirements, national policy, and necessary evidence. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Now, it is being presented under a policy framework that places increased emphasis on biodiversity, peatland preservation, landscape integrity, and the wellbeing of the community.

There is a lack of a complete and reliable evidential foundation for making a determination on this application. Significant gaps in baseline data persist, accompanied by the use of an undefined design envelope. The reliance on unspecified mitigation measures and the failure to include crucial impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—are apparent. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of the significant effects or residual impacts that may arise.

Furthermore, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment signifies a material omission. Such inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal also stands in opposition to National Planning Framework 4, lacking demonstration of biodiversity protection, safeguarding of natural areas, and preservation of cultural heritage. It fails to show that the health and wellbeing impacts are acceptable and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are

incomplete and occasionally inconsistent with one another. The evidential threshold necessary to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unsuitable for determination. The significant information deficiencies, along with conflicts with policy and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must reject this application or invoke the appropriate regulatory measures to compel the submission of the necessary information.

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

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: BEBBF682

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. It is informed by an examination of the Environmental Impact Assessment Report and accompanying documents, 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 renowned for its Atlantic-facing coastline, relatively untouched environment, and rich cultural identity. Concerns arise from the proposal's scale, proximity to the shoreline, and design, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful decision. Key environmental data is absent, baseline information is inconsistent and limited, and several crucial elements of the proposal remain undefined. The adoption of a flexible design framework obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to evaluate their efficacy. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts involved, and the assertions of negligible or non-significant effects are unsubstantiated by robust evidence.

Furthermore, there are evident and substantial conflicts with policy. The proposal seems 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 provide assurance that national standards for protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These discrepancies directly affect the statutory criteria required for consent and compromise the competent authority's ability to determine that the development is acceptable under policy frameworks.

The unprecedented scale of this proposal introduces large turbines positioned very near to the shoreline, raising major concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of adequate information, the reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial, as it fails to furnish a comprehensive, transparent, and dependable account of the potential environmental impacts associated with the proposal. The reliance on a flexible Project Design Envelope, which does not commit to definitive turbine dimensions, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. This lack of specificity compromises the integrity of the assessment and precludes both the public and the competent authority from grasping the actual extent of the environmental effects that may arise.

Furthermore, the application is heavily predicated on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consequently, consent is being requested with the expectation that any environmental harm will be addressed subsequently, which undermines the ability to conduct a meaningful evaluation of effectiveness or to assess residual impacts. This postponement of vital information to post-consent phases is procedurally untenable and contravenes the objectives of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation must be unequivocally established prior to determination.

Evidential deficiencies also abound, encompassing gaps in baseline data, limitations in methodology, and the use of assumptions rather than site-specific evidence. Such issues lead to uncertainty surrounding 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 hinders a clear comprehension of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory obligations.

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

In conclusion, the interdependence on an undefined design envelope, the absence of specified mitigation strategies, and the shortcomings in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental impacts, placing the competent authority in a position where it cannot make an informed determination based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly flawed and does not provide a thorough

understanding of the ecological receptors involved. This marine system is biologically active and sensitive, yet the baseline data presented is incomplete, and the methodologies used fail to accurately capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to important seabird populations that are currently experiencing declines. The ornithological assessment fails to adequately demonstrate that these species will not face adverse effects from the proposed development. This site is located within key foraging areas and migratory pathways, yet the application does not thoroughly assess the risks of displacement, collision, or

habitat loss for the seabirds.

A key contradiction within the application arises from the developer's assertion that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation, which is only necessary if significant harm is anticipated. This contradiction undermines the reliability of the assessment and raises doubts about the conclusions that have been drawn.

The evidence provided does not sufficiently assure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. There is inadequate consideration of the significance of these feeding grounds, and reliance on modelling introduces uncertainty, especially for declining species like Kittiwakes and Fulmars. The methodologies used may underestimate mortality rates, particularly when baseline data is lacking and the behavioural responses of the species are not well understood.

The placement of turbines in a designated migratory corridor poses an additional risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of potential mortality within this corridor have not been adequately assessed, nor have the potential impacts on species with small global populations.

From a regulatory standpoint, the application does not meet the required evidential standard needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and limitations in modelling, indicates that the assessment has not achieved the necessary standard of beyond reasonable scientific doubt. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

Furthermore, the deficiencies highlighted show 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 directly contradicts national policy.

Overall, the assessment is deemed unreliable due to internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These issues hinder a proper evaluation of potential impacts and lead to the 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 the environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity in the current application is fundamentally inadequate. It treats heritage merely as a collection of isolated, static assets, overlooking their ongoing social, cultural, and spiritual significance within the community.

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

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

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

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, making the determination of the proposal unlawful.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment is concerning and raises immediate questions about the validity of the proposal. Despite the developer conducting focus groups with local residents, the complete report has not been published. This lack of disclosure creates a substantial evidential gap, hindering both public understanding and the ability of the competent authority to fully grasp the social risks highlighted by the developer's own research.

Summaries that are available reveal that local residents are already facing measurable

levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These findings stem from direct engagement with the community and are not mere speculation. However, without access to the full assessment, it is impossible to scrutinise these findings adequately or to appreciate their significance in the decision-making process.

The proposal has also been identified as a threat to community identity and cohesion, with “cultural loss” being one of the impacts noted in the developer’s findings. Unfortunately, these impacts have not been sufficiently addressed within the main application nor accorded the necessary weight. The failure to release the full Social Impact Assessment obscures the true human and social costs associated with the development.

Moreover, the inadequacy of information undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, particularly when community character and functioning are at stake. The application lacks a comprehensive evidential basis required to assess the balance between potential benefits and harms due to the absence of the full dataset.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 in terms of health and wellbeing. Development should promote positive health outcomes while minimising harm, yet evidence suggests there are existing adverse effects that remain undisclosed. Without the complete assessment, it cannot be asserted that the application complies with this policy.

The implications of these procedural shortcomings are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a critical omission within the application and fails to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

Taken as a whole, the failure to disclose the full Social Impact Assessment alongside clear evidence of existing adverse impacts renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the assertion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is fundamentally insufficient and does not reflect the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and significant sense of remoteness. The proposed large-scale turbines near the shoreline would introduce a persistent and prominent industrial presence, dramatically altering this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to convey the extent of this visual change adequately. The size and proximity of the turbines would overshadow views from residential areas, historical sites, and popular coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not effectively communicate this impact or its importance in the context of such a delicate landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. Evidence indicates that these viewpoints might not fully capture the most sensitive receptors or worst-case scenarios, especially regarding significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been downplayed, compromising the assessment's reliability.

Another critical shortcoming is the lack of consideration of the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integrated into a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The assessment approaches these as isolated entities without recognising their interdependence, leading to an incomplete understanding of the impacts on their settings and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with the National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The magnitude of change is not compatible with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and closeness of the turbines, their presence would be predominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be mitigated to an acceptable degree.

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 dependable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents serious deficiencies in the assessment of construction and pollution risks, which are crucial for understanding potential environmental impacts. It

entails significant seabed preparation and installation activities within the dynamic Atlantic environment, yet lacks comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed post-consent, thereby obstructing a thorough evaluation of their effectiveness and sufficiency.

This dependence on future, undefined measures is particularly alarming due to the sensitivity of the local environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to disturbance and contamination from sediment. While the application acknowledges the risks associated with sediment mobilisation and possible chemical or oil spills, it fails to provide adequate information on preventative, controlling, or monitoring strategies.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of rigorous modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on sensitive marine species and habitats identified in the broader assessment.

Furthermore, the lack of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent is granted, the application inhibits an evaluation of whether sufficient safeguards exist to manage pollution incidents. This presents procedural risks and compromises the capacity of the competent authority to properly assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the principles set forth in the Environmental Impact Assessment regime. Significant effects and required mitigation must be thoroughly assessed prior to consent; the absence of such information renders a lawful determination unattainable. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Collectively, the lack of defined mitigation measures, insufficient management plans, and uncertainties about potential impacts render the assessment fundamentally inadequate. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal concerning the waters off the West Lewis coast is fundamentally flawed, as it neglects to provide a thorough assessment of fisheries and marine life. This area is home to a rich marine ecosystem and supports an active fishing industry, yet the application fails to show how these vital uses and habitats will be safeguarded from significant disruption.

A major concern lies in the unfounded assumption that fishing activities can simply be displaced without adverse effects. There is no evidence presented that alternative fishing grounds are available, accessible, or able to accommodate increased pressure from displaced fishing efforts. This lack of information is critical, as such displacement could lead to overfishing in other areas and would have broader economic repercussions for the local fishing fleet. Without a clear, evidence-backed evaluation, the implications for fisheries and local livelihoods remain vague and concerning.

Moreover, the application raises significant risks to marine species, particularly due to the underwater noise generated during construction activities. The high-energy hammer piling anticipated over a prolonged period is likely to disturb marine life across large distances, notably impacting species such as dolphins. The projected disruption to a substantial portion of the local bottlenose dolphin population is alarming, yet the application minimizes the seriousness of these effects without adequate supporting evidence.

The document also exhibits glaring contradictions; it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously stating that the anticipated impacts are negligible. This inconsistency severely undermines the assessment's credibility and raises questions about adherence to the Habitats Regulations, particularly when harm is expected to an extent that necessitates legal authorisation.

Furthermore, the assessment lacks consideration of cumulative impacts stemming from various pressures such as habitat disruption, noise pollution, and the displacement of fishing activities. Without an all-encompassing evaluation of these combined effects, it is impossible to accurately ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not convincingly demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It fails to prove that the development can coexist with current marine users or avoid unacceptable repercussions on marine biodiversity, which hinders any determination that the proposal aligns with sustainable development principles.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding dark skies and nocturnal wildlife represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in the region's environmental quality, cultural identity, and tourism appeal. The proposed installation of permanent red aviation lighting, visible over considerable distances,

would create an ongoing and intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This failure is particularly important considering the significance of dark skies to the area's identity and the development of emerging tourism sectors, such as astro-tourism. This gap in assessing landscape and environmental impacts is concerning.

Equally alarming is the lack of evaluation regarding the effects of artificial lighting on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can cause disorientation and a heightened risk of collision. The absence of a lighting impact assessment or a phototaxis study in the application means there is no evaluation of how the aviation lighting may impact these species or contribute to increased mortality.

This shortfall is exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and its associated risks. For example, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this potential risk remains unassessed. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts.

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

From a policy standpoint, this omission contravenes National Planning Framework 4, particularly concerning the safeguarding of natural places and environmental quality. Additionally, it undermines the overall assessment of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall setting.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife constitutes a major 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 proposal under consideration presents a severe deficiency in the assessment of tourism impacts, neglecting to evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While

the application notes that 86% of visitors are attracted by the area's scenery, it fails to provide any quantified assessment of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution to the area.

Tourism on the Isle of Lewis has seen significant growth, rising from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs, making up as much as 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and deterioration of environmental quality could affect the Tourism Gross Value Added or the overall economic resilience. Without this analysis, it is impossible to ascertain whether the proposed development would bring about a net economic benefit or detract from an established and flourishing sector.

Furthermore, the assessment overlooks the crucial role that environmental quality plays in supporting tourism, including the vital importance 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 exacerbates this issue, resulting in a considerable gap in understanding the impacts on a recognised and expanding segment of the local economy.

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

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

Overall, the shortcomings in quantifying tourism impacts, analysing the environmental factors influencing visitor behaviour, and recognising the economic dependency of the island culminate in a substantial evidential gap. This significantly hampers any robust evaluation of the economic effects and reinforces the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, as it does not align with statutory duties, national policy, or evidential standards. This application echoes the core issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape

integrity, and community wellbeing, the application lacks a thorough and reliable evidential basis.

Critical gaps in baseline data are evident, alongside the continued use of an undefined design envelope and an overreliance on unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects and residual impacts.

There are also clear procedural failures associated with the proposal. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment represents a material omission. These deficiencies impede the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Environmental risks remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent, and the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, preventing a lawful conclusion that impacts are acceptable.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 547B696B

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation reveals several material deficiencies related to planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of this proposal, along with its proximity to the shore, raise significant concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

There is a notable lack of critical environmental data within the application, with baseline information being both limited and inconsistent. Key components of the proposal remain undefined, and the flexible design framework obstructs a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

The application exhibits clear conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural habitats, cultural heritage, and health and wellbeing. The proposal does not demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and impair the competent authority's capacity to determine the development's acceptability in policy terms.

The unprecedented scale of this proposal, with large turbines positioned dangerously close to the shoreline, raises profound concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, the reliance on undefined mitigation measures, evidential weaknesses, and apparent policy non-compliance, it is clear that the application is incomplete and incapable of facilitating a lawful determination. Under these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data severely compromise the Environmental Impact Assessment Report, making it unreliable and incomplete. This combination of deficiencies leads to an assessment that cannot lawfully or robustly evaluate environmental effects, thereby leaving the competent authority unable to make an informed decision based on the provided information.

The application places undue emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these circumstances means that any environmental harm is intended to be addressed later, which hampers the ability to effectively evaluate these measures or assess any residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable, contradicting the essential aim of the Environmental Impact Assessment regime that mandates clear establishment of significant effects and mitigation prior to any determination.

There exist substantial evidential deficiencies, including missing baseline data and limitations in methodology, along with an over-reliance on assumptions rather than site-specific evidence. These issues generate uncertainty around the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information inhibits a thorough understanding of cumulative and worst-case impacts and fosters scientific uncertainty that cannot be aligned with statutory requirements.

The application does not meet the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to show that impacts have been fully assessed or that appropriate safeguards are in place.

The deficiencies in the Environmental Impact Assessment Report, stemming from the flexible Project Design Envelope that lacks commitment to specific turbine dimensions and configurations, introduce significant uncertainty. This uncertainty ultimately undermines the integrity of the assessment and obscures the actual environmental impacts from both the public and the competent authority, leaving a critical gap in understanding the true extent of potential effects from the development.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured, evidence-based assessment of alternatives, which does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of a thorough comparison of realistic alternatives based on their environmental effects, it offers a narrative account of the project's evolution. This method does not sufficiently demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

The lack of transparency in evaluating alternative offshore locations, development scales, or design configurations is evident. The developer has not shown that they have meaningfully considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact, the absence of such analysis hinders any conclusion that the proposed siting represents the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the application does not employ mitigation by design, instead relying on post-design measures.

Consequently, the application fails to show that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether there are less harmful and more suitable alternatives. Without a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises compliance with National Planning Framework 4, particularly regarding the protection of natural 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 concerning marine ecology and protected species is critically flawed, providing neither a complete nor reliable understanding of the ecological receptors within the West Lewis coastal environment. This marine system is highly sensitive and biologically active; however, the baseline data presented is incomplete, and the methodologies used do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment fails to offer a robust evidential basis for evaluating impacts.

One significant shortcoming pertains to otters, classified as a European Protected Species, as the application neglects to adequately recognise and assess their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently evaluated. This oversight undermines any conclusions that suggest there are no significant effects on this species.

Additional deficiencies become evident in the evaluation of basking sharks, where reliance on aerial surveys introduces a substantial detection bias, particularly in Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially in contrast to established land-based observations that indicate frequent use of these waters. The failure to consider or incorporate such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

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

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The uncertainty introduced by this lack of thorough evaluation prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, 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 inhibit a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant shortcomings regarding the protection of biodiversity, failing to meet the evidential standards necessary to ascertain that no adverse effects will occur to protected sites. The presence of contradictions within the application undermines the assessment's reliability. Notably, while the developer asserts that no significant adverse effects will arise, this claim is juxtaposed with the advancement of a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. Such inconsistencies raise serious concerns about the validity of the conclusions drawn, indicating a lack of robust support from the underlying evidence.

The application overlooks the critical importance of key foraging areas and migratory pathways for seabird populations on the west coast of the Isle of Lewis, which are internationally recognised and currently face declining numbers. The assessment fails to adequately evaluate crucial factors such as displacement, collision risk, and habitat loss, particularly concerning seabirds tied to protected sites like the Lewis Peatlands and St Kilda. The reliance on modelling approaches raises uncertainties, especially for species experiencing severe declines, such as Kittiwakes and Fulmars. Additionally, the

methodologies employed likely underestimate potential mortality rates, as they do not fully account for incomplete baseline data or the complexities of behavioural responses.

The siting of turbines within a recognised migratory corridor poses a further significant risk by creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, as well as the potential impact on species with small global populations, have not been sufficiently addressed in the application.

From a regulatory standpoint, the evidence presented does not satisfy the necessary threshold to determine that protected sites' integrity will remain unaffected. The assessment's contradictory conclusions, along with data gaps and methodological limitations, indicate that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby preventing a lawful conclusion that would support the granting of consent.

In summary, the ornithological assessment suffers from serious internal inconsistencies, methodological flaws, and a lack of substantial evidence, rendering it unreliable. Collectively, these deficiencies hinder an accurate evaluation of the impacts and indicate that the application does not fulfil the statutory requirements essential for determination, thereby conflicting with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal in question fails to adequately assess the cultural heritage and community identity of the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic view, treating heritage as isolated and static rather than recognising its ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice. However, the assessment categorises them as static features, neglecting their continued use, meaning, and the impact that the proposed development would have on their setting. This mischaracterisation leads to an inadequate evaluation of the cultural effects and overlooks their important role in community life.

The assessment also fails to take into account intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity yet are completely omitted from the assessment, representing a significant oversight. Without addressing these factors, it is impossible to truly understand the cultural impact of the development.

Moreover, there are serious concerns regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity that aligns with recognised characteristics of an Indigenous People, yet no process of Free, Prior and Informed Consent has been undertaken. This lack of meaningful engagement undermines the validity of the assessment and disregards established principles of participation in decisions that affect cultural and environmental interests.

A major procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet 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 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, along with the failure to recognise living cultural practices, marks a clear deviation from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application does not offer a sufficient foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a critical issue that undermines the assessment of social impacts, health, and wellbeing associated with the proposed development. Although the developer has engaged local residents through focus groups, the absence of the complete report represents a significant evidential gap. This gap restricts both public understanding and the competent authority's ability to fully grasp the social risks highlighted in the developer's own research.

Evidence shows that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are thus factual, not speculative. The lack of transparency in sharing the full assessment hinders proper scrutiny of these findings and limits the assessment of their significance in the decision-making process.

Moreover, there is a perception among residents that the proposal threatens community identity and cohesion, with indications of "cultural loss" noted in the developer's findings. Yet, these social impacts have not been adequately integrated into the application or given the necessary weight. Consequently, the withholding of the full assessment obscures the true human and social cost of the development.

This failure of transparency significantly undermines the Environmental Impact

Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when they may affect community character and functioning. Without the full dataset, the application lacks a comprehensive evidential basis for weighing the balance between potential benefits and harms.

From a policy standpoint, the application does not satisfy the requirements of National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid harm; however, the available evidence reveals existing adverse effects that have not been fully disclosed. Consequently, it is impossible to demonstrate compliance with this policy in the absence of the full assessment.

The procedural implications 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 meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the complete Social Impact Assessment and the documented existence of adverse impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is fundamentally inadequate and does not reflect the true scale of change or the sensitivity of the receiving environment. The coastline of West Lewis, characterised by its open Atlantic horizon and undeveloped nature, exudes a strong sense of remoteness. The placement of large-scale turbines near the shoreline would lead to a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape that is irreversible.

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

Concerns also arise regarding the selection and representation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This casts doubt on the assessment's reliability, suggesting that the visual impact may have been understated.

Additionally, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. These sites are treated as isolated elements, failing to recognise their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change is incompatible with the obligation to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertions of policy adherence.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resultant change is fundamental and permanent, incapable of being reduced to an acceptable level through any form of mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This deficiency is alarming, particularly given that the application depends on future mitigation and contingency measures, which are to be formulated post-consent. Such an approach does not allow for a thorough assessment of their adequacy or effectiveness.

The environmental context is crucial; the West Lewis coastline is home to clean coastal waters and significant habitats that are sensitive to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate details on how these issues will be prevented, controlled, or monitored effectively.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the

extent, duration, or ecological effects of these impacts. This uncertainty raises concerns about potential effects on marine species and habitats that have already been identified as vulnerable in the wider assessment.

The situation is further exacerbated by the lack of detailed emergency response procedures. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether suitable safeguards are in place to manage pollution events. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to consent, as the absence of such information renders a lawful determination unfeasible. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts significantly undermines the assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The inadequacy of the assessment regarding fisheries and marine life raises serious concerns about the potential ecological and socio-economic impacts of the proposal. The waters off the West Lewis coast not only host a diverse marine ecosystem but also support an active fishing industry. However, the application fails to sufficiently demonstrate that these vital uses and habitats can be protected or maintained without causing significant disruption.

A critical issue is the unfounded assumption that fishing activities can be displaced without any repercussions. The lack of evidence to show that there are alternative fishing grounds that are accessible and capable of supporting the added pressure is particularly alarming. This gap in information is crucial, as the risk of overfishing in other areas poses potential economic consequences for the local fishing fleet. Without a clear and evidence-based assessment, it becomes impossible to understand the true impacts on fisheries and the livelihoods they support.

The proposal also poses significant risks to marine species, especially due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended period is likely to cause widespread disturbance, affecting species such as dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population raises substantial concerns, yet the application tends to minimise the significance of these effects, lacking sufficient supporting evidence.

Moreover, there is a troubling inconsistency within the application that acknowledges the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction severely undermines the credibility of the assessment and brings into question its compliance with the Habitats Regulations, particularly where harm is expected to the extent that legal authorisation is required.

The assessment does not adequately account for cumulative impacts arising from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains uncertain.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is fundamentally inadequate, failing to encompass the full range of impacts arising from a singular integrated project. The offshore turbines and onshore works are interconnected, yet they are evaluated separately, resulting in a disjointed analysis that masks the true magnitude of environmental and socio-economic repercussions.

The onshore components entail cabling traversing protected moorland, the establishment of a substation near Stornoway, and the related access infrastructure within sensitive landscapes. These activities necessitate excavation through areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon reservoir and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thereby obstructing a complete understanding of the project's overall environmental footprint.

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

There are substantial risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not establish that the impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been implemented. This creates a notable evidential gap concerning biodiversity protection.

The proposal further raises critical concerns about carbon balance. The disruption of peatland releases sequestered carbon, potentially incurring a carbon debt that undermines the aims of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains favourable.

Moreover, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal entitlements. The application fails to provide evidence that the requisite consents or processes have been initiated, leading to questions regarding both feasibility and lawful execution.

From a policy standpoint, the lack of a holistic assessment of the project and failure to demonstrate the protection of peatlands, habitats, and land use interests are at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated significantly weakens the application.

In summary, the disjunction of project components, the absence of a comprehensive assessment, and the deficiency of evidence relating to environmental and land use impacts render this portion of the application incomplete and unreliable, thereby obstructing 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 change will fundamentally alter the night-time environment of the West Lewis coastline, which is noted for its exceptionally dark skies. The dark skies not only contribute to the environmental quality of the area but also play a significant role in its cultural identity and tourism value.

A crucial oversight within the Environmental Impact Assessment is the complete lack of evaluation regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the growing importance of dark skies to tourism sectors such as astro-tourism, this omission is particularly significant. Furthermore, the assessment fails to address potential impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can lead to disorientation and a heightened risk of collisions.

The application does not include any lighting impact assessment or phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the

likelihood of increased mortality. The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or the associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has been overlooked. The absence of site-specific night-time data creates a critical gap in the understanding of ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and obstructing a lawful determination of the application.

From a policy standpoint, this omission contravenes National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. Additionally, the lack of consideration for night-time character undermines the broader assessment of landscape and seascape impacts.

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

TOURISM

The assessment of tourism impacts within this application is fundamentally inadequate, neglecting to examine the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and its unique sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide any quantified analysis regarding how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Since 2017, tourism has seen remarkable growth, expanding from £65 million to over £81.5 million, while supporting over 1,000 jobs and comprising up to 16% of the island's economy. Despite this progress, the application does not evaluate how the industrialisation of the seascape and the degradation of environmental quality would affect the Tourism Gross Value Added or broader economic resilience. Without such essential analysis, it remains unclear whether the proposed development would generate a net economic benefit or detract from an established and expanding sector.

Moreover, the assessment overlooks the critical role that environmental quality plays in fostering tourism, particularly regarding the significance of unspoiled landscapes and dark skies for visitor experiences. This gap is further exacerbated by the absence of a Dark Skies Assessment, which hinders understanding of the impacts on an acknowledged and growing segment of the local economy, such as nature-based

tourism and astro-tourism.

For an island community that faces limited economic diversification, the failure to thoroughly assess tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. Additionally, the lack of 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 the National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefits. It also contradicts strategic objectives that identify tourism as a priority growth sector and does not furnish sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the collective failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This deficiency hampers a comprehensive evaluation of economic effects and supports 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 as defined by statutory duties, national policy, and evidential criteria. The application echoes the fundamental issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the unacceptable scale of industrialisation was highlighted. This current proposal is put forth under a policy framework that supposedly emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not satisfy these requirements.

There are substantial shortcomings in the evidential basis for determining the application. Critical gaps exist in baseline data, with an undefined design envelope and unspecified mitigation measures. Furthermore, key impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and effects on tourism have been omitted. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of potential significant effects and residual impacts.

Additionally, procedural issues are evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duties established under the Islands (Scotland) Act 2018. Furthermore, the failure to present a full Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal contradicts National Planning Framework 4, as it does not adequately

protect biodiversity, natural places, or cultural heritage. It also fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impact of offshore and onshore components has not been adequately assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle, which prevents a lawful conclusion that impacts are acceptable.

Furthermore, the proposal would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual connections, and negative implications for tourism are all permanent effects that cannot be mitigated to an acceptable level.

In summary, the application is both procedurally and substantively unfit for determination. The significant information deficiencies, paired with policy conflicts 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 invokes the appropriate regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

The Isle of Lewis and Harris is a beautiful and unspoilt area of significant global importance culturally and ecologically as well as home to a culturally diverse and rare community. It is also somewhere to escape the hustle and bustle of everyday life for many people including myself. The explosion of proposed wind farm developments in the Scottish Highlands has been a cause of distress and anguish for myself and many others. The race towards Net Zero has become less about actually helping to prevent climate change and more towards making profits for power companies and their investors and is certainly not done for any community benefit. This must stop and those responsible for the damage already caused to the Highlands Natural beauty held responsible and where necessary prosecuted.

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: 8F88072D

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 frameworks. Upon reviewing the Environmental Impact Assessment Report and accompanying documentation, it is evident that there are significant deficiencies across various dimensions, including planning, environmental, cultural, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale and design of the proposed development, particularly its proximity to the shoreline, raise essential questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential foundation for a lawful decision. There are notable omissions of critical environmental data, limited and inconsistent baseline information, and several key elements of the proposal remain undefined. The use of a flexible design framework hinders a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the impacts on the environment, culture, and community, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

Furthermore, there are clear and significant conflicts with established policies. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. Such conflicts are pivotal to the statutory tests necessary for consent and hinder the ability of the competent authority to determine the development's acceptability in terms of policy.

The unprecedented scale of this proposal in this location, combined with the placement of large turbines in close proximity to the shoreline, raises serious concerns regarding landscape capacity, visual impact, and environmental consequences. Taken collectively, the absence of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy reflect that the application is incomplete and insufficient for lawful consideration. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or dependable account of the anticipated environmental repercussions of the proposal. The implementation of a flexible Project Design Envelope, which lacks firm commitments to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. Such a situation undermines the assessment's integrity and results in impacts that may not accurately represent the development that will ultimately be constructed. This deficiency precludes both the public and the competent authority from grasping the true extent of the environmental effects involved.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consequently, consent is sought on the premise that any environmental harm will be addressed subsequently, hindering any meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly articulated before determination.

Additionally, there are significant evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. These issues yield uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainties that cannot be reconciled with statutory obligations.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate conformity with National Planning Framework 4, especially with respect to biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly evaluated or that suitable safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation measures, and the deficiencies in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determination based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application proposes a project but fails to provide a proper assessment of alternatives, which does not meet the requirements set by the Environmental Impact Assessment regime. It does not offer a structured comparison of realistic alternatives based on their environmental effects. Instead, it presents a narrative of how the project has evolved. This approach does not show that less harmful options have been adequately identified, assessed, and chosen over more damaging solutions.

There is a lack of transparent comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not prove that the developer has truly considered placing turbines further offshore, where the potential for visual, ecological, and coastal impacts would likely be lessened. Considering the sensitivity of the West Lewis coastline and the critical role of proximity to shore in impact assessment, the absence of such analysis prevents any determination that the proposed siting is the least damaging choice.

The shortcomings also apply to the assessment of cable routing and landfall, revealing inadequate evidence that alternative routes have been properly investigated to avoid or reduce impacts on sensitive areas, including those of cultural and spiritual significance like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation through design has not been applied. Instead, there seems to be an over-reliance on mitigation measures that occur after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful selection of the site, layout, and routing of infrastructure. This indicates a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to assess whether less harmful and more suitable alternatives exist. Without a thorough assessment of alternatives, it cannot be determined that the proposal is a sustainable or compliant solution with relevant policies.

From a policy standpoint, this lack of assessment undermines compliance with National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and the wellbeing of communities. The failure to provide a structured and comparative assessment is a significant omission that contributes to the conclusion that the application has not been adequately evaluated, thereby failing to support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to provide a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is notably sensitive and biologically active, yet the baseline data presented is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, there is a lack of sound evidential basis for evaluating potential impacts.

A significant oversight in the assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. This neglect extends to their core foraging range and behavioural patterns, resulting in an inadequate evaluation of the potential effects related to construction disturbance, noise, and increased activity. Such oversights compromise the conclusions drawn regarding the absence of significant effects on this species.

Moreover, the assessment of basking sharks is deficient, with a reliance on aerial surveys that introduces considerable detection bias, especially under Atlantic conditions. This approach is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The failure to include or appropriately consider such data results in an incomplete baseline and significantly undermines the reliability of the conclusions reached.

The limitations in methodology lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This creates uncertainty regarding the true risks 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 fails to properly identify or assess protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, which necessitates the application of the precautionary principle. In light of these factors, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant shortcomings, characterised by internal inconsistencies and gaps in evidence that undermine its findings. The application does not sufficiently demonstrate that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected by the proposed development. Key foraging areas and migratory pathways are situated within the development site, yet there is inadequate evaluation of the potential implications related to displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, as the developer asserts that there will be no significant adverse effects, while also proposing a Habitats Regulations derogation case, which is typically necessitated only when significant harm is anticipated. This inconsistency raises questions about the credibility of the assessment and suggests that the conclusions drawn lack support from reliable evidence. Furthermore, the assessment does not sufficiently address the potential impacts on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not thoroughly examined, and the reliance on modelling techniques introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. The methodologies employed may likely underestimate mortality, especially given the incomplete baseline data and limited understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, essentially creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor and the potential effects on species with relatively small global populations have not been adequately assessed. From a regulatory standpoint, the application falls short of meeting the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the assessment does not achieve the standard of proof beyond reasonable scientific doubt. This situation engages the precautionary principle, resulting in an unlawful conclusion regarding consent.

In addition, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct contradiction with national policy. Collectively, these factors contribute to the assessment being unreliable, primarily due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. Consequently, these shortcomings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. The evaluation adopts a narrow perspective, viewing heritage merely as isolated, static assets without acknowledging their ongoing social, cultural, and spiritual significance within the community.

Significant shortcomings are evident in the treatment of culturally important sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places for spiritual practice; however, they have been classified as

static features within the assessment. This mischaracterisation neglects their continued use and meaning, as well as the effects of development on their settings, leading to an incomplete analysis of cultural impacts and overlooking their role in community life.

Moreover, the assessment does not take into account intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity and are conspicuously missing from the assessment, constituting a major oversight. The failure to consider these factors inhibits a comprehensive understanding of the development's cultural impact.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity recognised as that of an Indigenous People. However, the absence of a process for Free, Prior and Informed Consent raises questions about the legitimacy of the assessment and disregards established principles for participation in decisions that affect cultural and environmental matters.

A significant procedural error is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic repercussions on the island community. This alone compromises the legality of the determination process.

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

In summary, the oversight of living heritage, intangible cultural values, community rights, and statutory responsibilities culminates in a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application does not offer a sufficient foundation for evaluating the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment, which included focus groups with local residents, yet the full report remains unpublished. This lack of disclosure constitutes a significant evidential gap that hinders the public and the competent authority from grasping the complete scope of social risks identified in the developer's own research.

Summaries indicate that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are derived from

direct engagement, thus are not speculative. However, the failure to make the full assessment available limits proper scrutiny of the findings and restricts the ability to assess their significance in the decision-making process.

There is additional evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" acknowledged within the developer's own findings. Despite this acknowledgment, such impacts have not been fully incorporated into the main application or afforded the appropriate weight. The withholding of the complete Social Impact Assessment therefore clouds the true human and social costs associated with the development.

This lack of transparency significantly 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 may be compromised. The application, by not providing the full dataset, fails to present a comprehensive evidential basis necessary for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and avoid harm; however, existing evidence highlights adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy cannot be substantiated.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a material omission within the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This deficiency prevents a lawful determination and underscores that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application lacks an adequate assessment of the seascape, landscape, and visual impacts, failing to capture the sensitivity of the receiving environment and the extent of change. The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would create a continuous and imposing industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The visual change associated with the development has not been appropriately represented. Due to the size and proximity of the turbines, they would dominate views

from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and undermining the qualities that define naturalness and remoteness. The assessment does not adequately convey the significance of this impact in relation to such a sensitive landscape.

There are significant methodological issues concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of the visual impact has been understated, which undermines the credibility of the assessment.

Additionally, the application fails to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment addresses these assets as isolated entities, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these crucial relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This situation represents not just a visual impact but a broader cultural and spatial detriment that has not been adequately addressed within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The scale of change is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment diminishes the claim of policy compliance.

It is evident that the impacts identified are beyond effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbance and contamination. The proposal for substantial seabed preparation and installation works within this high-energy Atlantic

environment raises serious concerns, particularly as the assessment of construction and pollution risks is incomplete. The application lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans, relying instead on undefined mitigation and contingency measures that would be formulated after consent has been granted. This approach hinders any meaningful evaluation of their adequacy or effectiveness.

There is a troubling reliance on future measures that are not yet defined, especially given the sensitivity of the receiving environment. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies. Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result 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, leaving potential effects on marine species and habitats inadequately addressed.

The absence of detailed emergency response procedures exacerbates these issues. Deferring contingency planning to a post-consent stage obstructs the assessment of whether sufficient safeguards are in place to handle pollution events. This not only introduces procedural risk but also compromises the ability of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the lack of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation must occur prior to granting consent, and the absence of such information renders a lawful determination unachievable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, detailed management plans, and clarity regarding potential impacts contribute to a materially deficient assessment. These shortcomings further underscore the conclusion that the application is incomplete and cannot be appropriately evaluated for construction and pollution risks.

FISHERIES AND MARINE LIFE

The application under consideration presents a significant concern regarding the assessment of fisheries and marine life, which is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. The coastal waters off West Lewis are home to a rich marine ecosystem and support an active fishing industry; however, the proposal does not provide evidence that these essential uses and habitats can be preserved or maintained without notable disruption.

A critical shortcoming lies in the presumption that fishing activities can be displaced without repercussions. The application fails to substantiate claims that there are alternative fishing grounds available, accessible, and able to accommodate any

additional pressure. This lack of evidence is crucial, as displacement of fishing efforts could lead to overfishing in other areas and create broader economic ramifications for the local fishing fleet. Consequently, without a well-supported assessment, the potential impacts on fisheries and the livelihoods dependent upon them remain inadequately understood.

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 over extended durations is expected to disturb marine life over extensive distances, including species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application diminishes the importance of these potential effects without providing sufficient evidence.

Inconsistencies within the application further exacerbate concerns. While there is an acknowledgment of the necessity for licenses to permit harm to European Protected Species, the impacts are concurrently described as negligible. This contradiction not only undermines the credibility of the assessment but also raises doubts about compliance with the Habitats Regulations, especially in instances where anticipated harm would require legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. An absence of a comprehensive evaluation regarding these cumulative effects hinders the ability to ascertain the overall implications for 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 falls short of showing that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal represents sustainable development.

In summary, the deficiencies noted—including a lack of evidence regarding fishing displacement, an underestimation of acoustic impacts, and internal inconsistencies—render the assessment incomplete and unreliable. These shortcomings prevent a robust 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 Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline boasts exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, visible from considerable distances, would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

The application neglects to evaluate the impacts of this lighting on visual amenity,

landscape character, or the experiences of residents and visitors. This lack of consideration is critical, given the significance of dark skies for the identity of the area and the emerging sector of astro-tourism. Such omissions create a distinct gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on 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 lead to disorientation and an increased risk of collision. The application does not provide any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or lead to increased mortality rates.

This oversight is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been investigated. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, this omission is inconsistent with National Planning Framework 4, which pertains to the protection of natural environments and the quality of the surroundings. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time is an integral aspect of the environment.

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

TOURISM

The assessment of tourism impacts is critically inadequate, neglecting to evaluate the economic and social ramifications for a key sector of the Isle of Lewis economy. Tourism thrives on the area's wild coastline, nearly untouched landscape, dark skies, and overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how extensive offshore infrastructure might affect visitor numbers, behaviours, or the overall economic contribution of this sector.

The tourism sector has experienced substantial growth, rising from £65 million in 2017

to more than £81.5 million, which supports over 1,000 jobs and represents up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and a decline in environmental quality would impact the Tourism Gross Value Added or broader economic resilience. Without such analysis, it remains unclear if the development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment inadequately considers the importance of environmental quality in supporting tourism, especially the value of pristine landscapes and dark skies to visitor experiences and burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, leaving a significant gap in understanding the impacts on a recognised and flourishing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the requirement to establish net benefit. Additionally, it contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as outlined by statutory duties, national policy, and evidential criteria. This application revisits the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. It is now presented under a strengthened policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data render the application inadequate and unreliable for determination. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of significant impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—result in an incomplete Environmental Impact Assessment. This incompleteness obstructs a thorough understanding of likely significant effects and residual impacts.

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

The proposal is also incompatible with National Planning Framework 4, as it does not adequately demonstrate protection of biodiversity, natural places, or cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and lacks evidence of net economic benefit due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, some of which are internally inconsistent, do not meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

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

Considering these factors, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or employ the relevant regulatory provisions to mandate the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 8E57D644

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, revealing significant deficiencies related to planning, environmental impact, cultural considerations, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural heritage. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policies, and the principles of sustainable development due to its scale, proximity, and design.

A crucial issue is the inadequate evidential basis provided for a lawful assessment of the application. There are notable gaps in critical environmental data, while baseline information is both limited and inconsistent. Furthermore, important elements of the proposal remain undefined. The application employs a flexible design framework that hinders a clear comprehension of the potential significant effects, and it relies on unspecified mitigation measures, which precludes an evaluation of their effectiveness. Consequently, the documentation does not furnish a full or informed understanding of the impacts on environmental, cultural, or community aspects, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, the application presents clear and significant conflicts with established policy. It appears inconsistent 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 proposal does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine whether the development is acceptable in policy terms.

The unprecedented scale of the proposal in this region, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of sustaining a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed as it relies on an incomplete Environmental Impact Assessment Report that lacks transparency and reliability regarding the expected environmental effects of the proposed development. A flexible Project Design Envelope is used, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hampers the consistent application of a worst-case scenario. As a result, the assessment's integrity is compromised, and the impacts outlined may not accurately represent the development that is ultimately built. This situation inhibits both the public and the competent authority from gaining a true understanding of the environmental implications.

Furthermore, the application is built on an over-reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. As a result, consent is sought based on the premise that environmental harm will be addressed in the future, which thwarts any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of crucial information until after consent has been granted is procedurally unacceptable and runs contrary to the aims of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established before any determination can take place.

The report exhibits notable evidential deficiencies, with significant gaps in baseline data and limitations in methodology. It relies on assumptions rather than site-specific evidence, leading to uncertainty regarding the magnitude and significance of impacts. This is particularly concerning where conclusions of negligible or non-significant effects are claimed without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory requirements.

Consequently, the application fails to meet the evidential standard set by the Habitats Regulations to discount adverse effects beyond reasonable scientific doubt. The precautionary principle must be invoked here, especially concerning protected species and sensitive habitats. Additionally, the proposal does not comply with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report not only unreliable but also incomplete. These shortcomings hinder a lawful and comprehensive evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application is fundamentally flawed in its 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 impacts, it offers merely a narrative account of the project's evolution. This approach does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging solutions.

There is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the developer has not shown that locating turbines further offshore has been seriously considered, even though such a move could likely reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact mean that the absence of this analysis undermines any claim that the proposed siting is the least damaging option.

The inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been properly investigated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been considered, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been adequately minimised through effective site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy, thus hindering the competent authority's ability to determine whether less harmful and more suitable alternatives are available. The absence of a robust alternatives assessment raises serious doubts about the sustainability and policy compliance of the proposal.

From a policy standpoint, these shortcomings compromise adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that contributes to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application proposes the development of turbines within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already in decline. However, the ornithological assessment is materially 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.

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 introduces uncertainty, particularly for species in severe decline, like Kittiwakes and Fulmars. Furthermore, the methodologies applied are likely

to underestimate mortality due to incomplete baseline data and a lack of understanding of behavioural responses.

A fundamental contradiction exists within the application; the developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only needed when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and the support for the conclusions drawn.

The siting of turbines in a recognised migratory corridor introduces an additional significant risk, creating a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately assess the long-term implications of sustained mortality in this corridor or the potential impacts on species with small global populations.

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

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

Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage along the West Lewis coastline is insufficient. It does not recognise this area as a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead, the application treats heritage as a collection of static assets, overlooking their social, cultural, and spiritual roles in the community.

Significant shortcomings are evident in the treatment of important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places of spiritual significance. However, the assessment mischaracterises them as unchanging features, neglecting their ongoing use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural impacts, ignoring their vital place in community life.

Moreover, the assessment does not address intangible cultural heritage, such as the

Gaelic language and local traditions, which are essential to the area's identity. The lack of consideration for these elements represents a major gap in the assessment, making it impossible to fully grasp the cultural impact of the proposed development.

Concerns also arise regarding community rights and participation. The Gaelic-speaking community possesses a unique cultural identity akin to that of Indigenous Peoples. Despite this, the process of Free, Prior and Informed Consent has not been carried out. This lack of engagement undermines the assessment's validity and does not align with principles of participation concerning cultural and environmental matters.

Additionally, a significant procedural error is the absence of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot adequately assess the social, cultural, and economic effects on the island community. This oversight alone renders the determination unlawful.

From a policy standpoint, these inadequacies contradict National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to evaluate both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear deviation from required policies.

Overall, the lack of consideration for living heritage, intangible cultural significance, community rights, and statutory responsibilities leads to a critical evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, failing to provide a reliable 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 conducted by the developer is a critical shortcoming that affects the evaluation of the application. While the developer engaged local residents through focus groups, the full report remains unpublished, leading to a significant evidential gap. This absence hinders both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research.

Evidence suggests that residents are experiencing measurable levels of stress, anxiety, and concern linked to the scale and proximity of the proposed development. These findings are based on direct engagement and should not be viewed as speculative. However, without access to the complete assessment, the findings cannot be adequately scrutinised, and their significance in the decision-making process is diminished.

Furthermore, the proposal is perceived as a threat to community identity and cohesion, with the developer's findings highlighting concerns over "cultural loss." These social impacts have not been sufficiently acknowledged in the main application and have not been assigned the appropriate weight. The failure to disclose the full Social Impact

Assessment obscures the true human and social costs of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. The absence of the complete dataset leads to an incomplete evidential basis for balancing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. It is required that developments promote positive health outcomes and avoid causing harm. However, the evidence currently available points to existing adverse effects that have not been fully disclosed. Thus, without the full assessment, compliance with this policy remains unproven.

The procedural implications of this situation are profound. The competent authority cannot perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission within the application and signifies a failure to meet the evidential standards mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with documented evidence of adverse impacts, renders the evaluation incomplete and unreliable. This situation hampers a lawful determination and reinforces the conclusion that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately capture the extent of change and the sensitivity of the environment. Notably, the West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a pronounced sense of remoteness. The planned installation of large-scale turbines near the shoreline would introduce an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

The assessment does not sufficiently represent the magnitude of the anticipated visual changes. Due to the scale and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would severely impact visual amenity and diminish the defining characteristics of naturalness and remoteness. Moreover, the assessment fails to adequately convey the level of impact or its significance within such a sensitive landscape.

Concerns also arise regarding the methodology employed in the selection and presentation of visual viewpoints. There is evidence to suggest that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This

oversight raises the possibility that the extent of visual impact has been underestimated, thereby compromising the reliability of the assessment.

A critical shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape setting, connected through visual and spatial relationships to the Atlantic horizon. The assessment mistakenly treats these 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 relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This change represents not only a visual impact but also a broader cultural and spatial detriment that has not been sufficiently addressed within the application.

From a policy standpoint, the proposal contravenes the National Planning Framework 4, particularly regarding the safeguarding of natural environments and historic assets. The degree of change proposed is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

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

In summary, the assessment fails to accurately represent the scale of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings preclude a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies regarding the assessment of construction and pollution risks, which ultimately undermines the ability to properly evaluate potential environmental impacts. The application involves considerable seabed preparation and installation works in a dynamic Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be developed after consent, obstructing any meaningful appraisal of their potential effectiveness.

This approach is particularly troubling given the ecological sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to both sediment disturbance and contamination. While the application does acknowledge risks associated with sediment mobilisation and

accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring strategies.

Moreover, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without reliable modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these disturbances. This uncertainty also extends to the possible effects on already identified sensitive marine species and habitats within the broader assessment framework.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application hampers the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This not only introduces procedural risks but also weakens the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before consent is granted; without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy mandates regarding environmental protection and water quality.

Collectively, the absence of specific mitigation measures, the failure to present detailed management plans, and the uncertainty surrounding potential impacts render the assessment fundamentally inadequate. These issues prevent a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

Furthermore, the application acknowledges the necessity for licences to allow harm to European Protected Species, while simultaneously downplaying the potential impacts as negligible. This contradiction raises doubts about the assessment's reliability and compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation. The assessment also neglects to address cumulative impacts from various pressures such as habitat disturbance, noise, and fishing displacement. Without a thorough evaluation of these combined effects, it is impossible to accurately gauge the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, making it difficult to conclude that the proposal aligns with sustainable development principles. Collectively, the lack of evidence regarding fishing displacement, the underestimation of noise impacts, and the internal inconsistencies render the assessment insufficient and untrustworthy. These issues hinder any reliable evaluation of the potential effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents an incomplete assessment of the onshore infrastructure, failing to address the full extent of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are inextricably linked, yet they have been evaluated separately, leading to a fragmented analysis that obscures the true scale of both environmental and socio-economic effects.

Included among the onshore elements are the installation of cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The assessment does not comprehensively evaluate these impacts, thus hindering a complete understanding of the project's environmental footprint.

Furthermore, the application's exclusion or deferral of onshore impact assessments obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components together, yet the delineation between offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application fails to demonstrate that a thorough assessment of these habitats has been conducted or that suitable avoidance measures have been instituted, thus revealing a significant

evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises concerns about potential conflicts with existing land use and legal rights. The absence of evidence indicating that the requisite consents or processes have been initiated brings into question the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and to demonstrate the protection of peatlands, habitats, and land use interests is in conflict with both the National Marine Plan and National Planning Framework 4. The lack of evidence supporting the avoidance or mitigation of impacts further undermines the application.

In summary, the segmentation of project components, coupled with the absence of a thorough assessment and insufficient evidence regarding environmental and land use impacts, renders this portion of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

The ornithological assessment relies solely on daytime survey data, which fails to account for nocturnal activity and the associated risks for species like Kittiwakes that may forage or migrate at night. This lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal. Without a thorough assessment of these nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, the omission of these assessments contradicts National

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

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

TOURISM

The assessment of tourism impacts associated with the application is significantly inadequate, failing to address the economic and social repercussions for a vital sector within the Isle of Lewis economy. It is critical to acknowledge that tourism relies heavily on the region's wild coastline, almost untouched landscapes, dark skies, and a prevailing sense of remoteness. While the application indicates that 86% of visitors are attracted by the scenery, it neglects to provide a quantified evaluation regarding how large-scale offshore infrastructure may influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced considerable growth, increasing 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. Nonetheless, the application does not adequately model the potential impacts on Tourism Gross Value Added or the broader economic resilience stemming from the industrialisation of the seascape and a decline in environmental quality. Without such a thorough analysis, it remains unclear whether the proposed development would yield a net economic benefit or pose a threat to an established and expanding sector.

Furthermore, the assessment disregards the critical role of environmental quality in enhancing tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences, alongside emerging markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable void in understanding the effects on a recognised and evolving segment of the local economy.

Given that the island community has limited economic diversification, the lack of an impact assessment on tourism holds broader implications for employment, local enterprises, and community sustainability. The failure to produce a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as mandated under the Islands (Scotland) Act 2018.

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

In summary, the collective failure to quantify the impacts of tourism, evaluate environmental factors influencing visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This shortcoming obstructs a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exhibits serious deficiencies that compromise its compliance with sustainable development criteria as mandated by statutory duties, national policy, and evidential standards. Similar issues that led to the rejection of the Lewis Wind Power proposal in 2008 are apparent, as the current application presents a level of industrialisation that remains unacceptable despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis necessary for a sound determination of the application. The use of an undefined design envelope is problematic, and there is a lack of specified mitigation measures. Furthermore, the application omits critical impact pathways, particularly concerning nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Procedural shortcomings are also evident, notably the absence of a compliant Island Communities Impact Assessment, which contravenes statutory requirements set forth in the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment is a material omission that inhibits the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural places, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. The absence of tourism impact modelling fails to provide evidence of any net economic benefit. Moreover, there has been insufficient assessment of the cumulative impact from both offshore and onshore elements, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surround environmental risks, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. This lack of thorough investigation, and instances of internal inconsistency, do not meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, thereby hindering the capacity to lawfully conclude that impacts are acceptable.

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

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

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

Additional Comments

Born and raised here on the Isle Of Lewis, I treasure the peace, the tranquility, the natural beauty- it's what makes it the special place to live that it is.

We actually don't need these...Scotland already generates too much energy from windfarms that is fed directly to England...

A lot of the time the Energy Companies are paid to have them 'off'. The gridline is at max capacity and as taxpayers we are paying for that. I know renewables are our future, but in the right context and capacity.

And this is not it.

Us as islanders won't benefit from this energy either...my bills won't be cheaper...but we will have to hear and see these every single day plus all the drilling etc that will be a prerequisite to the windfarms.

The project is majority owned by Northland Power, a Canadian company, with the electricity generated going into the national grid not guaranteed cheaper bills for local households.

The turbines proposed are some of the biggest in the world at 338m, would form a wall along the west coast, and would be visible from the other side of the island, from the hills of South Harris, and right across the Minch.

If consented it would cause huge damage to island communities, cultural heritage, marine life, birds, night skies, tourism and rare and precious habitats - the onshore infrastructure and cable corridor would be sited on machair and blanket bog, two of the rarest habitats on earth.

The energy would be transported the length of Scotland to the Lowlands and England. Wild, unspoiled, biodiverse places should not be sacrificed to industry - this is the

wrong development in the wrong place.

And the impact stays here and will stay here longer term as these can't be recycled.

As a resident of Ness, which will be directly affected, I object to this in the strongest possible terms.

[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: 0AB81D98

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to adequately assess the likely environmental effects of the proposal. It

employs a flexible Project Design Envelope that does not commit to specific turbine dimensions, layouts, or configurations, which introduces considerable uncertainty. This approach undermines the assessment's integrity, making it difficult for both the public and the competent authority to fully grasp the true extent of the environmental impacts, as the presented effects may not align with what will ultimately be constructed.

Additionally, the application significantly relies on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. By seeking consent on the premise that any environmental harm will be addressed at a later stage, it hinders a genuine evaluation of the effectiveness of these measures or an assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contradicts the intention of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are established before any determination.

The assessment is further weakened by evidential deficiencies, such as gaps in baseline data and limitations in the methodology, coupled with an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of the impacts, particularly where claims of negligible or non-significant effects are made without substantial supporting data. Without adequate information, the assessment fails to clarify cumulative and worst-case impacts, introducing a level of scientific uncertainty that conflicts with statutory obligations.

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

Overall, the combination of relying on an undefined design envelope, the lack of specified mitigation measures, and the presence of gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and comprehensive evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime, as it does not provide an adequate assessment of alternatives. Instead of a structured comparison of realistic alternatives based on their environmental effects, it offers a narrative account of how the project has evolved. This method does not adequately demonstrate that less harmful options have been properly

identified, assessed, and selected over more damaging solutions.

Furthermore, there is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the developer has not convincingly considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. Given the West Lewis coastline's sensitivity and the importance of proximity to the shore in assessing impact, the lack of such analysis hinders any conclusion that the proposed siting is the least damaging option.

The application also has significant shortcomings concerning cable routing and landfall assessment, as there is insufficient evidence that alternative routes have been thoroughly explored to minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The absence of a clear avoidance strategy, coupled with a lack of comparative analysis, shows that mitigation by design has not been adequately applied. Instead, there appears to be a reliance on post-design mitigation measures.

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

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 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 is inadequate and does not furnish a comprehensive or dependable understanding of the ecological receptors present in the West Lewis coastal environment. This area is characterised as a highly sensitive and biologically rich marine system, yet the baseline data provided is insufficient and the methodologies utilised do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment falls short of providing a solid evidential foundation for evaluating the impacts of the proposed developments.

A significant oversight involves otters, which are classified as a European Protected Species. The application inadequately acknowledges and evaluates the active utilisation of coastal areas by otters for foraging and movement. Without a proper assessment of their core foraging ranges and behavioural patterns, the potential

consequences of construction disturbances, noise, and increased activity have not been thoroughly examined. This lack of consideration undermines any conclusions drawn regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks is compromised by the reliance on aerial surveys, which introduce considerable detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. By failing to incorporate or adequately evaluate such data, the assessment produces an incomplete baseline, which diminishes the reliability of its conclusions.

The methodological shortcomings result in conclusions about negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of sufficient baseline data also hampers any meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates significant uncertainty regarding the actual scale of risk posed to marine species and habitats.

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

In summary, the combination of insufficient baseline data, flawed methodologies, and unsupported conclusions collectively undermines the reliability of the assessment. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks an adequate evidential basis.

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The 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 West Lewis coastline is characterised by its undeveloped nature, open Atlantic horizon, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, significantly altering this unique character and leading to a permanent transformation of the landscape. The application fails to adequately reflect the magnitude of this visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and compromising the naturalness and remoteness that define the area.

Moreover, there are significant methodological issues regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may not

effectively represent the most sensitive receptors or the worst-case scenarios, especially in relation to key cultural heritage sites and high-value landscapes. This suggests that the visual impact may be underestimated, which calls into question the reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnected relationships between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape framework, intricately linked by visual and spatial relationships to the Atlantic horizon. The assessment incorrectly treats these assets as isolated, failing to acknowledge their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The scale of change is incompatible with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any assertion of policy compliance.

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

Collectively, the assessment does not accurately represent the scale of impact, the environment's sensitivity, or 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 application is materially deficient due to the absence of defined mitigation measures and a lack of detailed management plans, which collectively prevent a robust evaluation of construction and pollution risks. The assessment of these risks is incomplete and fails to provide the necessary detail to evaluate likely environmental effects. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. This uncertainty extends to the potential effects on already identified sensitive marine species and habitats.

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not contain fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined future measures to be developed post-consent, which raises significant concerns given the sensitivity of the receiving environment. The West Lewis coastline supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

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 assess environmental protection measures at the point of determination. This introduces procedural risk that further complicates the evaluation of appropriate safeguards to respond to pollution events.

From a regulatory standpoint, the deferral of critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are assessed prior to consent; the absence of this information means that a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality. Taken as a whole, these shortcomings reinforce the conclusion that the application is incomplete and unfit for approval.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to an active fishing industry and a diverse marine ecosystem. However, the application fails to adequately evaluate the ecological and socio-economic impacts on these vital resources. A significant issue arises from 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 able to sustain the increased pressure from displaced fishing. This lack of 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 thorough, evidence-based assessment, the true impacts on fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal poses considerable risks to marine species, notably due to the underwater noise produced during construction activities. Extended periods of high-energy hammer piling are likely to cause disturbances over large distances, adversely affecting species like dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population is alarming, yet the application minimises the seriousness of these effects without adequate supporting evidence.

There is a notable inconsistency in the application regarding the necessity for licences to permit harm to European Protected Species while simultaneously asserting that

such impacts are negligible. This contradiction undermines the reliability of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts stemming from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, 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 mitigate unacceptable impacts on marine biodiversity, which inhibits any conclusion that the proposal constitutes sustainable development.

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application render the assessment incomplete and untrustworthy. These shortcomings prevent a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not account for the full range of impacts related to this single integrated project. The offshore turbines and the onshore works are interconnected, yet they are evaluated separately. This fragmented approach obscures the true scale of both environmental and socio-economic effects.

Onshore components include cabling that crosses protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. This work involves excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

Furthermore, by excluding or delaying the evaluation of onshore impacts, the application fails to allow for a proper examination of cumulative effects. The Environmental Impact Assessment process requires that all elements of a project are reviewed together. However, the separation of offshore and onshore components leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are also considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not prove

that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are raised as well. The disturbance of peatland could release stored carbon, leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this issue or demonstrate that the overall carbon balance remains beneficial.

Moreover, routing infrastructure through active croft land may introduce conflicts with current land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises doubts about its deliverability and lawful implementation.

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

In summary, the separation of project elements, the absence of a comprehensive assessment, and the lack of evidence on 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 lacks a comprehensive evaluation of dark skies and nocturnal wildlife, resulting in a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its remarkably dark skies, which are vital to the area's environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, visible from great distances, would create a continuous "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

There is no analysis of how this lighting may impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the significance of dark skies to the region's identity and the potential for emerging sectors like astro-tourism. The failure to account for these impacts results in a clear gap in the overall landscape and environmental assessment.

Moreover, the application neglects to evaluate the potential consequences for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic response, which can cause disorientation and increase collision risks. The absence of any lighting impact assessment or phototaxis study means that there has been no evaluation of how the proposed aviation lighting may affect these species or elevate mortality rates.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity and related risks. Kittiwakes, for instance, may forage or migrate at night and are also at risk of disorientation from artificial lighting, a risk that has gone unassessed. The lack of site-specific night-time data creates a serious shortfall in understanding the ecological impacts of the proposal.

Without an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, which invokes the precautionary principle and hinders a lawful determination.

From a policy standpoint, the omission contravenes National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, it undermines the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a crucial aspect of the ecosystem.

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

TOURISM

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

The tourism sector has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application neglects to model the potential impacts of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains unclear whether the proposed development would yield a net economic benefit or detract from a well-established and expanding sector.

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

tourism and astro-tourism.

Given the limited economic diversification in this island community, the neglect in assessing tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a substantial evidential shortfall. This deficiency obstructs a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the criteria for sustainable development when evaluated against statutory duties and national policy. It echoes the core 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, however, is framed within a stronger policy context that prioritises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

A reliable evidential foundation for this determination is lacking, marked by notable gaps in baseline data and the use of an undefined design envelope. It heavily relies on unspecified mitigation measures while overlooking crucial impact pathways, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment remains incomplete, inhibiting a full understanding of the significant likely effects or residual impacts.

Procedural shortcomings are evident as well, notably the absence of a compliant Island Communities Impact Assessment, which violates statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment constitutes a serious omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

In direct opposition to National Planning Framework 4, the proposal fails to ensure the protection of biodiversity, natural spaces, and cultural heritage. It does not sufficiently demonstrate that health and wellbeing impacts are acceptable, nor does it provide

evidence of a net economic benefit due to a lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their repercussions on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surround environmental risks, which could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals remain incomplete and, at times, inconsistent. The requisite evidential threshold needed to discount adverse effects beyond reasonable scientific doubt has not been achieved, thereby activating the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and the implications for tourism represent enduring effects that cannot be mitigated to an acceptable degree.

When considered collectively, the application is both procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or invoke the necessary regulatory provisions to demand the submission of the missing information.

For these reasons, a formal request is made to reject the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

As a resident of Scotland, this will impact me in that it will increase the redundant electricity generated and wasted in Scotland, with associated costs. Scotland is being used as a dumping ground for these developments. It will also set a dangerous precedent for other similar redundant developments.

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: 749B18D1

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 lacks essential information and does not adequately detail the potential environmental consequences of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates substantial uncertainty. This situation hinders the assessment's integrity and results in potential discrepancies between the reported impacts and the actual development, leaving both the public and

the competent authority without a clear understanding of the true environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The inadequacy of the alternatives assessment is significant and fails to satisfy the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of delivering a structured and reasoned evaluation of realistic alternatives grounded in environmental considerations, the application merely recounts the evolution of the project. This narrative fails to establish that less harmful alternatives have been duly identified, assessed, and selected in preference to solutions that may cause greater environmental damage.

There is a notable lack of a transparent and evidence-based analysis of alternative offshore locations, development scales, or design configurations. Specifically, the developer has not demonstrated that the possibility of situating turbines further

offshore has been seriously evaluated, despite the likelihood that such a move would mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the critical importance of proximity to shore in assessing impact, makes the absence of this analysis particularly concerning. Consequently, it is impossible to conclude that the proposed siting is the least damaging option available.

This deficiency is further reflected in the assessment of cable routing and landfall options, where there is insufficient evidence that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with the lack of comparative analysis, indicates that the principle of mitigation by design has not been appropriately applied. Rather, the application seems to rely on measures intended to mitigate after the design process.

As a result, the application does not convincingly demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy prevents the competent authority from determining whether less harmful and more suitable alternatives are available. The absence of a comprehensive assessment of alternatives also raises concerns about the sustainability and compliance of the proposal with relevant policies.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured comparative assessment constitutes a material omission that contributes to the conclusion that the application lacks adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to deliver a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is both sensitive and biologically rich, yet the available baseline data is inadequate, and the methodologies employed do not sufficiently document species presence, behaviour, or habitat usage. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A significant oversight concerns otters, classified as a European Protected Species. The application does not adequately acknowledge or assess their use of coastal areas for foraging and movement. The failure to evaluate their core foraging range and behavioural patterns means that the potential impacts of construction activities, noise, and increased human presence have not been sufficiently examined. This gap undermines any assertions regarding a lack of significant effects on this species.

In addition, the assessment of basking sharks is problematic. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic

conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. The failure to adequately incorporate such data leads to an incomplete baseline and diminishes the reliability of the conclusions presented.

The limitations in methodology result in conclusions about negligible or non-significant effects being based on assumptions rather than solid evidence. Without sufficient baseline data, it is impossible to conduct a meaningful assessment of cumulative and indirect impacts, which includes seasonal variations and broader ecosystem interactions. This situation raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Given these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment regarding ornithological impacts associated with the proposed development is significantly flawed, demonstrating serious gaps in evidence and inconsistencies that compromise its conclusions. Notably, the development is situated in areas critical for foraging and along migratory paths used by seabirds, yet the application fails to adequately assess the potential effects of displacement, collision risk, and habitat loss on these species. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already facing decline. The evidence provided does not meet the necessary standards to confirm that these species will not be negatively impacted.

Moreover, the assessment presents a fundamental contradiction; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation, which is only applicable if significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that its conclusions lack a solid evidentiary foundation. The implications of the feeding grounds for seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, are inadequately addressed. The reliance on modelling introduces additional uncertainty, particularly concerning species that are in severe decline, like Kittiwakes and Fulmars. The methodologies utilised appear to underestimate mortality risks, especially given that baseline data is incomplete and the

behavioural responses of the species are not thoroughly understood.

Furthermore, the location of turbines within a recognised migratory corridor adds an additional layer of risk, effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor are not sufficiently evaluated, nor are the potential impacts on species with relatively small global populations considered. From a regulatory standpoint, the application does not satisfy the evidential threshold required to assert that there will be no adverse effect on the integrity of the protected sites. The presence of conflicting conclusions, alongside notable data gaps and limitations in modelling, means that the requisite standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, which hinders a lawful conclusion that could support the granting of consent.

Ultimately, the deficiencies noted within the assessment point to a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to convincingly demonstrate that internationally significant seabird populations will remain unaffected places this proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable, marked by internal contradictions, methodological weaknesses, and inadequate evidence. Such shortcomings obstruct a comprehensive evaluation of impacts and culminate in the conclusion that the application does not satisfy the statutory requirements essential for its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal's assessment of cultural heritage and community identity is fundamentally flawed. It fails to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead, the application adopts a simplistic view, treating heritage as a collection of separate, unchanging assets rather than recognising their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of significant cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they are active places of burial and spiritual practice. The assessment overlooks their continued use and meaning, failing to appreciate how the proposed development would affect their surroundings. This mischaracterisation leads to an incomplete understanding of cultural impacts and neglects their importance to community life.

Moreover, the application does not adequately consider intangible cultural heritage, including the Gaelic language and local traditions, nor does it reflect the enduring relationship between the community and the coastal environment. These factors are essential to the area's identity, yet they are entirely excluded from the assessment, representing a critical oversight. Without addressing these elements, the true cultural impact of the development remains obscured.

There are also significant issues regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not been consulted through a process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the assessment's validity and does not align with recognised principles of participation in matters affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a severe procedural shortcoming, as mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission is critical and prevents a lawful determination.

From a policy standpoint, these deficiencies place the proposal at odds with the National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, constitutes a clear divergence from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been sufficiently evaluated, and the application lacks a solid foundation for determining the actual cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of a complete Social Impact Assessment significantly hampers the evaluation of social, health, and wellbeing impacts related to the development proposal. While the developer engaged with local residents through focus groups, the absence of the full report creates a notable evidential gap. This omission hinders both public understanding and the competent authority's ability to grasp the full range of social risks identified by the developer's own research.

Residents have already reported experiencing stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement with the community and are not mere speculation. However, the failure to release the complete assessment limits proper scrutiny and impedes the ability to assess the significance of these findings within the decision-making framework.

Moreover, the proposal is perceived as a threat to community identity and cohesion, with findings highlighting potential "cultural loss." Yet, these important social impacts have not been adequately integrated into the main application or given the necessary 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 compromises the Environmental Impact Assessment

process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application does not offer a robust evidential basis to assess the balance between benefits and potential harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the evidence presented reveals existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural consequences of this situation are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment, which constitutes a material omission in the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

In conclusion, the failure to disclose the full Social Impact Assessment, along with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the notion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Moreover, the application fails to accurately depict the scale of visual change. The turbines, due to their size and proximity, would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the key qualities of naturalness and remoteness, while the assessment does not effectively communicate the significance of these impacts within a sensitive landscape context.

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed management plans and defined mitigation measures leads to a materially deficient assessment of construction and pollution risks. The proposal, which entails substantial seabed preparation and installation works within a high-energy Atlantic environment, does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are set to be prepared after consent, thereby hindering a meaningful evaluation of their adequacy or effectiveness.

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 in place, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to the potential effects on marine species and habitats, which have already been identified as sensitive in the wider assessment.

The proposal also acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, yet it fails to provide sufficient details on how these risks will be prevented, controlled, or monitored. The sensitivity of the receiving environment, including the West Lewis coastline that supports clean coastal waters and important habitats vulnerable to sediment disturbance and contamination, further heightens these concerns.

Furthermore, the absence of detailed emergency response procedures compounds the issues raised. By deferring contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory perspective, this deferral of critical environmental safeguards is inconsistent with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be assessed prior to consent; if such information is lacking, a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the deficiencies identified within the assessment, including the lack of detailed management plans, uncertainty regarding potential impacts, and absence of defined mitigation measures, collectively illustrate that the evaluation of construction and pollution risks is inadequate and further support the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of sufficient assessment regarding fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the proposal does not adequately show that these critical uses and habitats can be safeguarded or sustained without significant disruption.

A major flaw lies in the assumption that fishing activity can be displaced without adverse effects. The application does not provide any evidence that alternative fishing grounds are available, accessible, or able to support the additional pressure that displacement would create. This is a crucial oversight, as such displacement could lead to overfishing in other areas and may result in broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the effects on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal carries substantial risks to marine species, particularly due to the underwater noise produced during construction. The anticipated high-energy

hammer piling over an extended period is likely to disturb marine life across large areas, significantly impacting species like dolphins. The application's predictions regarding disturbance to a considerable proportion of the local bottlenose dolphin population are alarming; yet, the significance of these impacts is downplayed without adequate supporting evidence.

There exists a clear inconsistency in the application, acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm is expected to such a degree that legal authorisation is needed.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure associated with the project is fundamentally flawed, failing to address the comprehensive impacts stemming from what constitutes a single integrated development. The offshore turbines and the onshore works are interconnected, yet they are evaluated in isolation, leading to a fragmented assessment that obscures the true magnitude of environmental and socio-economic consequences.

Key onshore components include the cabling that traverses protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through ecologically sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon reservoir and ecologically sensitive habitat. The application does not present a thorough evaluation of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The application also neglects to assess onshore impacts adequately, which prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates a holistic consideration of all project components; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Significant risks to sensitive habitats, such as machair systems and peatland environments that are subject to policy protection, are also present. The application fails to demonstrate that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a notable evidential gap regarding biodiversity protection.

Moreover, concerns arise regarding carbon balance due to the disturbance of peatland, which can release stored carbon and potentially create a carbon debt, undermining the objectives of renewable energy development. The application does not sufficiently address this issue or prove that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is insufficient evidence that the necessary consents or procedures have been initiated, leading to questions about the project's deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include an evaluation of dark skies and nocturnal wildlife, representing 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 potential. The proposed development would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" across the western horizon. This change would fundamentally alter the night-time environment.

Furthermore, the application fails to consider how this lighting would affect visual amenity, landscape character, and the experiences of residents and visitors. The significance of dark skies to the area's identity and the growth of tourism sectors like astro-tourism underscores the importance of addressing this issue. The absence of an assessment on these impacts leads to a notable deficiency in the overall landscape

and environmental evaluation.

More critically, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application lacks any assessment of lighting impacts or a phototaxis study, thereby failing to evaluate how aviation lighting might affect these species or heighten mortality rates.

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

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

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also weakens the overall analysis of landscape and seascape impacts, as the night-time character is an essential component of the environment.

In summary, the lack of assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot support a lawful determination.

TOURISM

The assessment of the proposed development lacks essential detail regarding its potential impacts on tourism, a crucial sector for the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the island has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not explore how the industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the resilience of the wider economy. This lack of

analysis leaves uncertainty as to whether the development would yield a net economic benefit or adversely affect an already thriving sector.

Additionally, the assessment overlooks the significance of environmental quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience. Emerging markets such as nature-based tourism and astro-tourism are also not addressed. The absence of a Dark Skies Assessment further highlights this shortcoming, creating a notable gap in understanding the potential impacts on a vital segment of the local economy.

In an island community with limited economic diversification, the neglect to assess tourism impacts poses broader consequences for employment, local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been scrutinised as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially regarding economic impact and the need to establish net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to furnish adequate evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and considering the island's economic reliance result in a substantial evidential void. This gap hinders a thorough assessment of the economic consequences and contributes to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria of sustainable development, as assessed against statutory duties, national policy, and evidential standards. This application mirrors the principal issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, which was rejected due to unacceptable industrialisation. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application still falls short.

There are significant gaps in the evidential basis necessary for determining the application. The use of an undefined design envelope, the reliance on unspecified mitigation measures, and the omission of essential impact pathways—including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—further undermine its validity. Consequently, the Environmental Impact Assessment lacks completeness, preventing an accurate understanding of likely significant effects or residual impacts.

Moreover, procedural deficiencies are evident, notably the absence of a compliant

Island Communities Impact Assessment, which breaches statutory duty under the Islands (Scotland) Act 2018. The failure to fully disclose the Social Impact Assessment represents a material omission, impeding the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings deem the application unfit for determination.

The application also stands in direct contradiction to National Planning Framework 4. It fails to demonstrate adequate protection for biodiversity, natural places, and cultural heritage, lacks evidence that health and wellbeing impacts are acceptable, and cannot substantiate a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been adequately assessed, clouding the evaluation of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are both 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 any lawful conclusion that impacts are acceptable.

This 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 of cultural and visual relationships, and negative impacts on tourism represent permanent consequences that cannot be effectively mitigated.

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

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

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: FEAE4CE6

