

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

Dear Sir/Madam

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

An adequate evidential basis for lawful determination is lacking in the application. Critical environmental data is absent, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework prevents a clear understanding of likely significant effects. Furthermore, the dependence on unspecified mitigation measures means their effectiveness cannot be assessed. Consequently, the documentation does not provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There are also evident policy conflicts. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements intended to protect biodiversity, climate interests, and environmental integrity. These conflicts are pertinent to the statutory tests necessary for consent and undermine the capacity of the competent authority to determine the development as acceptable in policy terms.

The scale of the proposal is unprecedented for this area, with large turbines positioned close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking and fails to present a complete, transparent, or reliable overview of the potential environmental effects of the proposed development. The proposal employs a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and obstructs the consistent

application of a worst-case scenario. As a result, the assessment's integrity is compromised, meaning the impacts detailed may not accurately represent the final construction, thereby limiting both public understanding and that of the competent authority regarding the true extent of environmental effects.

Moreover, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is being requested on the premise that environmental harm will be mitigated at a later stage, which hampers any meaningful evaluation of the proposed measures' effectiveness or the assessment of residual impacts. This postponement of essential information to post-consent phases is procedurally unsound and contradicts the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly defined prior to decision-making.

Evidential shortcomings are also present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the scale and significance of impacts, particularly where negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot meet statutory obligations.

Consequently, the application does not fulfil the evidential standard 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. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including requirements pertaining to biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly 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 render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot make an informed decision based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The West Lewis coastline is particularly sensitive, making the proximity to shore a crucial factor in determining environmental impact. Unfortunately, the assessment of alternatives within the application is materially inadequate and does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned comparison of realistic alternatives based on their environmental effects, the application merely recounts the project's evolution. This narrative approach fails to show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not convincingly demonstrate that the developer has seriously considered placing turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be lessened.

These deficiencies also extend to the evaluation of cable routing and landfall assessment, as there is inadequate evidence suggesting that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear strategy to avoid such impacts and the insufficient comparative analysis highlight that mitigation by design has not been effectively utilised, leading to an over-reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. Without a robust assessment of alternatives, it is impossible to conclude that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species contains significant deficiencies that hinder a complete understanding of ecological receptors in the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system. However, the baseline data provided is inadequate, and the methodologies used fail to effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not offer a reliable evidential basis for evaluating potential impacts.

A notable gap exists concerning otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. The oversight of their core foraging range and behavioural patterns raises concerns about the assessment of potential effects from construction disturbances, noise, and increased activity. This limitation undermines any conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks. The reliance on

aerial surveys introduces a significant bias in detection, especially under Atlantic conditions, which may lead to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or accurately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings suggest that conclusions regarding negligible or non-significant effects are primarily based on assumptions rather than solid evidence. The lack of comprehensive baseline data also restricts the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty complicates the understanding of the actual risks faced by marine species and 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 uncertainty created by these deficiencies precludes the possibility of excluding adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. Given 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 weaknesses 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 application presents serious concerns regarding its compliance with regulatory standards, particularly in relation to the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of contradictions within the conclusions, along with data gaps and limitations in the modelling approaches, results in a failure to achieve the level of certainty required beyond reasonable scientific doubt. This inadequacy engages the precautionary principle, which raises significant legal issues regarding the validity of the application for consent.

Furthermore, the assessment lacks sufficient evidence to demonstrate that the internationally important seabird populations associated with protected areas such as the Lewis Peatlands and St Kilda will remain unaffected. The critical nature of these feeding grounds is not thoroughly addressed, and the reliance on modelling creates uncertainty, especially concerning declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly when baseline data is lacking and the behavioural responses of these species are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a substantial risk, creating a barrier in a primary flight path used by species migrating

between the United Kingdom and Iceland. The assessment fails to adequately evaluate the long-term consequences of sustained mortality within this corridor and the potential impacts on species with small global populations.

The assessment as it stands is fundamentally flawed, riddled with internal inconsistencies and methodological weaknesses that undermine the reliability of its conclusions. These deficiencies prevent a thorough evaluation of the potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination. The implications of failing to protect biodiversity and natural assets under National Planning Framework 4 are clear, placing the proposal in direct opposition to national policy and raising urgent concerns about its overall validity.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is lacking and does not recognise the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are intertwined. Instead, the application simplifies heritage, viewing it as a collection of isolated, unchanging assets without acknowledging their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the way culturally important sites, like the cemeteries at Dalmore, Bragar, and Barvas, are addressed. These sites serve as active places for burial and spiritual practice, yet the assessment reduces them to static elements, neglecting their continued significance and the potential effects of development on their surroundings. This mischaracterisation leads to a partial understanding of cultural impacts and overlooks their importance in community life.

Moreover, the assessment does not take into account intangible cultural heritage such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These factors are essential to the area's identity but are missing from the assessment, which is a major oversight. Failing to consider these elements means that the cultural effects of the development cannot be accurately assessed.

There are additional issues surrounding community rights and engagement. The Gaelic-speaking community possesses a unique cultural identity recognised as that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the assessment's validity and does not align with established principles of participation concerning cultural and environmental interests.

A significant procedural gap exists due to the absence of a proper Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligations to assess the social, cultural, and economic effects on the island community. This

omission alone renders the determination unlawful.

From a policy standpoint, these inadequacies put the proposal at odds with National Planning Framework 4, particularly regarding the protection of historical assets and locations. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, clearly violates policy standards.

In summary, the lack of consideration for living heritage, intangible cultural value, community rights, and legal requirements creates a significant gap in the evidence. The cultural impacts of the development have not been properly evaluated, and the application lacks the necessary foundation for assessing the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment is a serious issue. This omission means that the public and the competent authority cannot fully understand the social risks highlighted by the developer's research. Summaries suggest that local residents are experiencing real stress, anxiety, and concern due to the scale and proximity of the proposal. These effects are based on direct feedback from the community and are not merely assumptions. However, without access to the complete assessment, the implications of these findings cannot be properly scrutinised, which limits the ability to gauge their importance in the decision-making process.

Moreover, the proposal is seen as a threat to community identity and cohesion, with "cultural loss" flagged in the developer's findings. Unfortunately, these impacts have not been adequately included in the application or given the necessary attention. The withholding of the full assessment obscures the true social and human costs of the proposed development.

This lack of transparency also weakens the Environmental Impact Assessment process. It is crucial to fully understand the social, economic, and health impacts of developments of this nature, especially where they may disrupt community character and functioning. The incomplete dataset means the application does not provide a solid basis for weighing benefits against potential harm.

From a policy standpoint, the application does not show adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet the available information highlights existing negative effects that remain undisclosed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural consequences of these shortcomings are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without the full Social Impact Assessment. This represents a critical gap in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the failure to disclose the complete Social Impact Assessment, alongside evidence of current adverse effects, leads to an incomplete and unreliable evaluation. This undermines the possibility of a lawful decision and confirms that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development, with its large-scale turbines near the West Lewis coastline, threatens to fundamentally alter the character of this region. This coastline is defined by its open Atlantic horizon, undeveloped character, and a profound sense of remoteness. The introduction of such industrial structures in close proximity to the shoreline would create a continuous and overwhelming presence that would result in a permanent and irreversible transformation of the landscape.

The assessment provided does not adequately represent the scale of the visual change that would occur. The turbines' height and proximity would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the essential qualities of naturalness and remoteness. The significance of this impact is not properly conveyed within the current assessment, leaving a considerable gap in understanding the effect on this sensitive landscape.

Moreover, there are serious methodological concerns regarding the selection of visual viewpoints. It appears that some viewpoints may fail to fully capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, thus compromising the reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnected relationship between seascape, landscape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these as isolated entities, neglecting their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these connections, altering how heritage assets are experienced and disrupting their relationship with the natural horizon. This transformation represents not just a visual impact, but also a broader cultural and spatial harm that has not been sufficiently assessed within the application.

From a policy standpoint, the proposal conflicts directly with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The proposed scale of change is incompatible with the necessary protection of 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 remains dominant and unavoidable. This change is therefore fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment fails to accurately reflect the magnitude of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These significant deficiencies hinder a reliable evaluation and confirm that the proposal is incompatible with the protection of this vital 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 waters off the West Lewis coast are home to a vibrant marine ecosystem and support a thriving fishing industry. However, the application does not adequately demonstrate how these essential uses and habitats can be preserved or sustained without causing significant disruption. There is a troubling presumption that fishing activities can simply be relocated without repercussions. The absence of evidence regarding the availability and accessibility of alternative fishing grounds raises concerns, as such displacement could lead to overfishing in other areas, adversely affecting the local fishing fleet and its livelihoods.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The prolonged use of high-energy hammer piling is expected to create disturbances over extensive distances, which may negatively impact local wildlife, including dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise the significance of these potential effects without adequate supporting evidence.

There is a notable inconsistency within the application that acknowledges the necessity of licences for any harm to European Protected Species while simultaneously claiming such impacts are negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially when harm is expected to occur at a level that necessitates legal authorisation.

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

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

In conclusion, the deficiencies in evidence concerning fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the

assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application proposes significant onshore infrastructure related to an integrated project involving offshore turbines and associated works. However, the assessment of the onshore elements is materially incomplete, failing to consider the full extent of impacts. The onshore works encompass cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure across sensitive landscapes. These activities involve excavation in deep peat areas, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. As a result, the application does not provide a thorough evaluation of the environmental footprint, preventing a complete understanding of the project's impacts.

The separation of the onshore and offshore components leads to a fragmented approach, which obscures the true scale of environmental and socio-economic effects. This lack of a comprehensive assessment also hinders the ability to evaluate cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively, yet the current assessment fails to integrate the combined effects on peatlands, habitats, and local communities.

Moreover, there are serious risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The proposal does not adequately demonstrate that impacts on these habitats have been fully assessed, nor does it show that appropriate avoidance measures are in place. This raises a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding the carbon balance associated with the disturbance of peatland, which releases stored carbon and potentially creates a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this issue and fails to demonstrate that the overall carbon balance remains positive.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, casting doubt on its deliverability and lawful implementation.

From a policy perspective, the failure to assess the project as a cohesive whole and the inability to demonstrate protection for peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. This further undermines the application, as it does not show that impacts can be avoided or mitigated.

In conclusion, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts

render this part of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a significant deficiency within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which contribute critically to environmental quality, cultural identity, and the value of tourism. The proposed installation of permanent red aviation lighting, which is visible over long distances, would create 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 impacts of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, which is a notable oversight considering the essential role of dark skies in the area's identity and the emerging sectors of astro-tourism. This lack of consideration leads to a significant gap in the landscape and environmental assessment.

Moreover, there is no assessment of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The application does not include any evaluation of lighting impacts or a phototaxis study, thereby neglecting to address how the aviation lighting may affect these species or contribute to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which fails to account for nocturnal activity or associated risks. Other species, like Kittiwakes, which may forage or migrate during the night, are equally vulnerable to disorientation from artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts.

In the absence of a nocturnal impact assessment, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt is not met, which engages the precautionary principle and hinders a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, it undermines the broader evaluation of landscape and seascape impacts, as the character of the night-time environment is a fundamental component of the overall setting.

Collectively, the lack of any assessment regarding 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 incapable of supporting a lawful determination.

TOURISM

The economic impact assessment related to tourism is severely inadequate and does not address the consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contributions from tourism.

Since 2017, tourism has seen substantial growth, rising from £65 million to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application does not consider how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or the wider economic resilience of the area. Without such crucial analysis, it remains unclear whether the proposed development would yield a net economic benefit or detract from an already established and expanding sector.

The assessment neglects to recognise the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding the potential impacts on an acknowledged and growing segment of the local economy.

In an island community characterised by limited economic diversification, the oversight in evaluating tourism impacts has broader implications for employment, local enterprises, and community sustainability. The failure to provide a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, particularly concerning economic impact and the obligation to prove net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence to permit the competent authority to evaluate the economic ramifications of the proposal.

All these factors combined—the failure to quantify tourism impacts, the oversight of environmental influences on visitor behaviour, and the disregard for the island's economic dependencies—culminate in a significant evidential gap. This inhibits a thorough assessment of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. This application mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable scale of industrialisation was a decisive factor. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a complete and reliable evidential foundation necessary for informed determination.

There are significant deficiencies in the baseline data provided, and the continued use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the failure to address key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, render the Environmental Impact Assessment inadequate. This lack of completeness prevents a thorough understanding of likely significant effects or any residual impacts.

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

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. It is imperative that

the competent authority either refuses consent based on these grounds or invokes the necessary regulatory provisions to compel the submission of the missing information.

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

Additional Comments

I have lived on the west coast of Lewis all my life and have been fishing on a small boat every summer for the last 40 years.

This monstrosity will undoubtedly put an end to this summer hobby which also provides us with a huge range of fresh fish species to eat during the summer fishing season.

I also have serious concerns for my grandsons which have special needs which will most certainly cause them severe mental harm.

There is no need for our island to host those turbines as we produce much more wind power than we could ever use locally.

If homes in the Souther end of the country want wind power then the turbines should be sited near where they are needed not hundreds of miles away.

I believe these turbines going ahead here is an injustice to our heritage and indigenous way of life and should be stopped.

How is there so much money already being spent on the island by an electricity company when full planning has not been granted??

They are already making obscene profits from us already before any turbines go ahead.

It looks like pure greed has taken a hold of those companies involved in this massive scale and yet they still keep putting our electricity prices up every year!

This project will undoubtedly make our electricity even more expensive as they're already being paid for switching of turbine when the grid cannot cope with any more power.

They're also tearing our eco countryside apart with this massive development even though planning has still not been fully approved.

Please protect our Island and our heritage and our indigenous ways alive by putting a stop to this obscene development.

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: 25D2DF57

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Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is founded on a thorough examination of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively untouched environment, and strong cultural identity. Concerns regarding the scale, proximity, and design of the project raise serious questions about its adherence to statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of critical environmental data, with baseline information being limited and inconsistent, and significant components of the proposal remaining undefined. The flexible design framework used hinders a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to determine the acceptability of the development in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a thorough, transparent, or reliable evaluation of the likely environmental consequences of the proposal. A significant issue lies in the use of a flexible Project Design Envelope, which lacks commitment to precise turbine dimensions, layouts, or configurations. This ambiguity introduces considerable uncertainty and hampers a consistent assessment based on worst-case scenarios. As a result, the integrity of the assessment is compromised, preventing both the public and the competent authority from grasping the true extent of environmental effects associated with the development that may ultimately be constructed.

Furthermore, the application places undue reliance on mitigation measures, monitoring strategies, and management plans that have yet to be established. This approach seeks consent on the premise that environmental harm will be addressed at a later stage, obstructing any meaningful evaluation of effectiveness or the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures be clearly defined prior to determination.

Additionally, there are critical evidential deficiencies, such as gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Collectively, 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 shortcomings prevent a lawful and rigorous evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, which is a critical requirement of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of viable alternatives based on environmental effects, it presents a narrative detailing the evolution of the project. This

method fails to prove that less damaging options have been thoroughly identified, assessed, and chosen over more harmful solutions.

There is no clear comparison of alternative offshore locations, development scales, or design configurations supported by evidence. Notably, the application does not show that the developer has seriously considered positioning turbines further offshore, where the visual, ecological, and coastal impacts are likely to be lessened. The sensitivity of the West Lewis coastline and the crucial role of proximity to the shore in determining impact highlight the significance of this missing analysis, which obstructs any conclusion that the proposed siting is indeed the least damaging option.

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

Consequently, the application does not illustrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This signifies a failure to adhere to the established mitigation hierarchy, which is essential for the competent authority to ascertain whether there are less harmful and more appropriate alternatives available. The absence of a thorough alternatives assessment undermines the conclusion that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this shortcoming jeopardises adherence to National Planning Framework 4, especially in terms of safeguarding natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a significant omission, contributing to the overall finding that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment presented regarding marine ecology and protected species is inadequate, failing to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal area. This marine environment is both sensitive and biologically active, yet the baseline data remains incomplete. The methodologies used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

There is a significant oversight concerning otters, which are a European Protected Species. The application does not appropriately recognise or evaluate their active use of coastal areas for foraging and movement. This neglect of their core foraging range and behavioural patterns means the assessment does not adequately consider the

potential effects of construction activities, noise, and increased human presence. As a result, the conclusions regarding the absence of significant impacts on this species are undermined.

Moreover, there are notable deficiencies in the assessment of basking sharks. The reliance on aerial surveys creates a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate regular use of these waters. The failure to include or adequately consider such data leads to an incomplete baseline, compromising the reliability of the conclusions drawn.

These methodological shortcomings result in claims of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation introduces uncertainty regarding the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as there has been inadequate identification and assessment of protected species. The uncertainty created prevents any conclusion about adverse effects from being excluded beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these conditions, granting consent is not legally permissible.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These issues impede a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The assessment contains significant gaps in evidence, alongside internal inconsistencies that undermine its conclusions. Specifically, the west coast of the Isle of Lewis hosts internationally important seabird populations, many of which are already in decline, yet the application does not adequately demonstrate that these species will remain unaffected. Furthermore, the development is situated within key foraging areas and migratory pathways, but it does not sufficiently evaluate the implications of displacement, collision risk, or habitat loss.

A fundamental contradiction exists within the application, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is required only in instances where significant harm is anticipated. This inconsistency raises concerns about the reliability of the

assessment and indicates that the conclusions drawn are not substantiated by the supporting evidence. The assessment fails to provide adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully acknowledged, and reliance on modelling approaches creates uncertainty, particularly for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly given the incompleteness of baseline data and the incomplete understanding of behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor introduces significant risk, effectively creating a barrier along a primary flight path for species travelling between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. Collectively, the deficiencies identified constitute a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application inadequately addresses the assessment of cultural heritage and community identity, neglecting to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. It adopts a simplistic view, treating heritage merely as isolated, static assets and failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of important cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices; however, they are categorised in the assessment as static features, overlooking their continued use and meaning, as well as the potential impact of development on their surroundings. This misrepresentation leads to an incomplete evaluation of cultural effects and neglects their vital role in community life.

Moreover, the assessment falls short by not considering intangible cultural heritage, which includes the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are crucial to the area's identity and are entirely omitted from the assessment, marking a significant lapse. Without addressing these aspects, the cultural implications of the development cannot be accurately understood.

There are additional issues related to community rights and engagement. The Gaelic-speaking population has a distinct cultural identity characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement diminishes the validity of the assessment and fails to comply with established principles regarding participation in decisions that affect cultural and environmental matters.

A notable procedural failure is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This omission means that the competent authority cannot meet its legal obligation to assess 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 National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly deviates from policy requirements.

Overall, the absence of a thorough assessment of 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 evaluated, and the application fails to provide a sufficient basis for determining the true cultural cost 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 remains unpublished. This absence of disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research.

Available summaries highlight that residents are already experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are not speculative. Yet, without the complete assessment, proper scrutiny of these findings is impossible, limiting the capacity to evaluate their significance in the decision-making process.

Furthermore, there is indication that the proposal is viewed as a direct threat to community identity and cohesion, with references to "cultural loss" noted within the developer's findings. Despite this recognition, these impacts have not been adequately incorporated into the main application or given the necessary consideration. The lack of access to the full Social Impact Assessment obscures the genuine 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 crucial for developments of this magnitude, especially where community character and functioning may be jeopardised. The failure to provide the complete dataset means the application lacks a comprehensive evidential basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and avoid adverse impacts; however, the existing evidence reveals harmful effects that remain undisclosed. Without the full assessment, it cannot be established that the application aligns with this policy.

The procedural implications of these omissions are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a critical shortfall in the application and signifies a failure to meet the evidential requirements of the Environmental Impact Assessment framework.

Overall, the non-disclosure of the complete Social Impact Assessment, combined with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application is not sufficiently substantiated.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a profound sense of remoteness. The assessment of seascape, landscape, and visual impacts associated with the proposal is deficient and fails to adequately reflect the scale of change and the sensitivity of the environment. The introduction of large-scale turbines close to the shoreline would establish a continuous and dominant industrial presence, fundamentally transforming the character of the landscape in a permanent and irreversible manner.

The application does not sufficiently represent the extent of the visual change that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, significantly impacting visual amenity and diminishing the qualities that define naturalness and remoteness. The current assessment does not accurately convey the level of impact or its significance in the context of such a sensitive landscape.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been underestimated, thus challenging the reliability of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting linked to the Atlantic horizon through visual and spatial relationships. The treatment of these sites as isolated assets does not acknowledge their interdependence, 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 perceived and severing their connection to the natural horizon. This constitutes not only a visual impact but also a broader cultural and spatial harm that has not been adequately examined in the application.

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change proposed is incompatible with the necessity 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 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 remains dominant and unavoidable. Consequently, the change would be fundamental and permanent, and not amenable to reduction to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the magnitude of 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 incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks related to the proposal is severely lacking in detail, which hinders a proper assessment of its likely environmental impacts. Significant seabed preparation and installation are planned within a high-energy Atlantic environment, yet the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is notable. Instead, the application relies on mitigation and contingency measures that are to be created after consent is granted, limiting any meaningful assessment of their sufficiency or effectiveness beforehand.

This reliance on unspecified future measures is particularly alarming, considering the sensitivity of the surrounding 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 potential risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide

adequate details on how these risks will be prevented, managed, or monitored.

There is significant uncertainty regarding the size and behaviour of sediment plumes that might result from seabed disturbance and cable installation. Without comprehensive modelling and well-defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment context.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application removes the opportunity to evaluate whether adequate measures are in place to address pollution events, thus introducing procedural risk. This situation undermines the competent authority's ability to assess the environmental protection measures effectively at the point of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies are assessed before consent can be granted. The application does not adequately demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding its assessment of marine life and the fishing industry, failing to provide a comprehensive evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing community, yet the proposal does not adequately demonstrate how these crucial habitats and activities will be preserved without considerable disruption.

One of the critical issues identified is the assumption that fishing activity can simply be displaced without consequences. The application does not present any evidence that alternative fishing grounds are available, accessible, or able to support the additional pressure that displacement would entail. This lack of information is crucial as such displacement could lead to overfishing in other areas and might have broader economic repercussions for the local fishing fleet. Without a transparent and evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

Furthermore, the proposal introduces considerable risks to marine species due to underwater noise from construction activities. Extended periods of high-energy hammer piling are expected to create disturbances over large areas, which could significantly affect species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is troubling; however, the application tends to minimise the importance of these effects without adequate supportive evidence.

There exists a notable inconsistency within the assessment itself, recognising the need for licences to authorise harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where harm is expected to occur at a level necessitating legal approval.

The assessment also neglects to address 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, the overall implications for marine ecosystems and local socio-economic conditions remain indeterminate.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 and the National Marine Plan. It does not adequately show that the development can operate alongside current marine users or avert unacceptable impacts on marine biodiversity, thus preventing any conclusion 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 throughout the assessment lead to an incomplete and unreliable appraisal of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Onshore elements include cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure in sensitive landscapes. These activities involve excavating deep peat areas, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, which hampers understanding of the project's total environmental footprint.

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. 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.

There is no assessment of how this lighting impacts visual amenity, landscape character, or the experiences of residents and visitors. This is a significant oversight, considering the importance of dark skies to the area's identity and the growing astro-tourism sector. The omission results in a clear gap in the overall landscape and environmental assessment.

More importantly, the application does not evaluate the impact on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The lack of a lighting impact assessment or phototaxis study means the proposal fails to consider how aviation

lighting may harm these species or lead to higher mortality rates.

This issue is worsened by the use of daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or associated risks. Kittiwakes, for example, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. This lack of assessment undermines the overall evaluation of landscape and seascape impacts since night-time character is an integral part of the environment.

Overall, the absence of any evaluation of dark skies and nocturnal wildlife represents a significant evidential gap. The application lacks baseline data, impact modelling, and species-specific analysis, making it incomplete and unable to support a lawful determination.

TOURISM

The tourism assessment presented in this application is fundamentally inadequate, failing to consider the economic and social ramifications for a critical sector of the Isle of Lewis economy. With tourism heavily reliant on the area's wild coastline, pristine landscapes, dark skies, and a sense of remoteness, this oversight is alarming. Although the application indicates that 86% of visitors are attracted by the scenery, it lacks a detailed evaluation of how large-scale offshore infrastructure might impact visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen remarkable growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application does not take into account how the industrialisation of the seascape and the deterioration of environmental quality could affect Tourism Gross Value Added or the overall resilience of the economy. Without a thorough analysis, it remains unclear if the proposed development would provide a net economic benefit or harm this vital and expanding sector.

Furthermore, the assessment neglects the significance of environmental quality in bolstering tourism, particularly regarding unspoiled landscapes and dark skies, which are essential to enhancing visitor experiences. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a critical gap in understanding the implications for an increasingly recognised and vital aspect of the local economy, such as nature-based and astro-tourism.

Given the limited economic diversification of the island community, the disregard for tourism impacts carries broader repercussions for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been sufficiently evaluated, contrary to requirements set forth in the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4, especially concerning economic impact and the need to prove a net benefit. It also stands in conflict with strategic goals that highlight tourism as a key growth sector and does not supply adequate evidence for the competent authority to assess the economic consequences of the proposal.

All these factors combined reveal a significant evidential gap due to the failure to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic reliance on tourism. This lack of thorough evaluation hinders a comprehensive understanding of the economic effects and underscores 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 evaluated against statutory duties, national policy, and evidential standards. This application mirrors the primary issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

A complete and reliable evidential basis for determination is lacking within the application. Significant gaps exist in the baseline data, along with an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of critical impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hampering a full understanding of likely significant effects or residual impacts.

Procedural failures are evident, particularly the absence of a compliant Island Communities Impact Assessment, which violates the statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

The proposal is at odds with the National Planning Framework 4, as it does not demonstrate the protection of biodiversity, natural places, and cultural heritage. It fails

to prove that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of offshore and onshore elements have not been assessed appropriately, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which may be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The considerable deficiencies in information, in conjunction with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information.

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

Additional Comments

Following a combined 44 years active service in the Royal Air force, my husband and I spent a great deal of time considering where it was we would like to put down roots.

We chose the West side of the Isle of Lewis.

We chose it because of its unspoilt natural beauty.

We chose it because of its strong sense of community. A community in which we already feel deeply rooted.

We chose it because of the precious wildlife.

We chose it for the crofting lifestyle.

We chose it because of, not in spite of, its remote nature.

We love our island home and the community we live in all of whom are proud of their

history and culture. And who love to share it with us.

When we discovered the N4 proposal and began to comprehend the scale and all its implications, we felt as though our sanctuary was/is under serious threat.

It's a constant black cloud hanging over us.

Is nowhere sacred? Is nowhere safe from the greed of others? We feel as though our home is viewed as a mere commodity by those who probably have never even set foot here.

If this project goes ahead it will be nothing short of devastating.

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: 7A2D13A7

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 lacks the necessary detail and transparency to accurately convey the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to precise turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hinders a consistent assessment based on worst-case scenarios, undermining the integrity of the evaluation. Consequently, the presented impacts may not accurately represent what will ultimately be constructed, leaving both the public and the competent authority without a clear understanding of the true environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be managed later obstructs any meaningful assessment of the effectiveness of these measures or the evaluation of residual impacts. This postponement of crucial information to stages following consent is procedurally unacceptable and runs counter to the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly defined prior to any determination.

Furthermore, there are notable gaps in the evidence provided, including insufficient baseline data and methodological limitations, leading to a reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of both cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory obligations.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species contains significant deficiencies that hinder a complete understanding of ecological receptors in the West

Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system. However, the baseline data provided is inadequate, and the methodologies used fail to effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not offer a reliable evidential basis for evaluating potential impacts.

A notable gap exists concerning otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. The oversight of their core foraging range and behavioural patterns raises concerns about the assessment of potential effects from construction disturbances, noise, and increased activity. This limitation undermines any conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks. The reliance on aerial surveys introduces a significant bias in detection, especially under Atlantic conditions, which may lead to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or accurately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings suggest that conclusions regarding negligible or non-significant effects are primarily based on assumptions rather than solid evidence. The lack of comprehensive baseline data also restricts the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty complicates the understanding of the actual risks faced by marine species and 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 uncertainty created by these deficiencies precludes the possibility of excluding adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. Given 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 weaknesses inhibit a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment conducted regarding cultural heritage and community identity is strikingly insufficient, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application takes a narrow perspective, viewing heritage merely as a collection of isolated, unchanging assets, rather than recognising their dynamic social,

cultural, and spiritual roles within the community.

A notable shortcoming is evident in the treatment of culturally significant locations such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places for burial and spiritual observance; however, the assessment mistakenly categorises them as static features. This oversight neglects their ongoing use and significance, as well as the development's potential impact on their surroundings. Such a mischaracterisation leads to an incomplete understanding of cultural effects, overlooking the essential role these sites play in community life.

Additionally, the application neglects to evaluate intangible cultural heritage, including the Gaelic language and traditions, as well as the longstanding connection between the community and the coastal environment. These aspects are vital to the area's identity yet are glaringly absent from the assessment, representing a considerable oversight. The failure to include these factors means that the cultural repercussions of the development remain inadequately explored.

Concerns also arise concerning community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent initiated. This lack of meaningful engagement undermines the credibility of the assessment and does not adhere to established principles for participation in decisions that impact cultural and environmental interests.

Moreover, there is a critical procedural lapse in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to scrutinise the social, cultural, and economic impacts on the island community. This omission alone renders any lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal in direct contradiction with the National Planning Framework 4, especially concerning the protection of historical assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to recognise living cultural practices, represents a clear deviation from policy expectations.

Ultimately, the collective failure to assess living heritage, intangible cultural value, community rights, and statutory requirements creates a significant gap in evidence. The cultural impacts of the development have not been properly examined, and the application does not furnish a solid foundation for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts from the proposed development is significantly lacking. It does not truly capture the extent of change expected or the sensitivity of the West Lewis coastline, which features an open Atlantic horizon and an undeveloped

character that contributes to its remote feel. The planned large-scale turbines, located near the shoreline, would introduce a continuous industrial presence that would drastically change this character, resulting in a permanent transformation of the landscape.

The application fails to adequately convey the scale of the visual changes that would occur. Because of their size and proximity, the turbines would dominate the views from residential areas and historic sites, as well as popular coastal locations. This would negatively affect the visual amenity and undermine the naturalness and sense of remoteness that defines the area. Additionally, the assessment does not sufficiently highlight the significance of these impacts within such a sensitive landscape.

Concerns also arise regarding the chosen visual viewpoints and how they are presented. There is evidence indicating that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the true magnitude of visual impact has been underestimated, thereby weakening the credibility of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship among landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, linked visually and spatially to the Atlantic horizon. The assessment treats these heritage sites as isolated, neglecting their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This presents not only a visual issue but also a broader cultural and spatial harm that has not been adequately evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which focuses on the protection of natural spaces and historical assets. The expected scale of change is incompatible 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 further diminishes any assertion of compliance with policy requirements.

It is also evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and close proximity of the turbines, their presence would be unavoidable and dominating. 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 does not accurately depict the scale of the impacts, the sensitivity of the environment, or the interrelated nature of landscape and heritage.

These shortcomings hinder a trustworthy evaluation and reinforce the conclusion that the proposal is at odds with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks lacks the necessary detail to properly evaluate the likely environmental effects of the proposed works at West Lewis. This project entails extensive seabed preparation and installation within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. The reliance on mitigation and contingency measures that are to be prepared post-consent raises significant concerns, as it prevents any meaningful evaluation of their adequacy or effectiveness.

This situation is particularly alarming given the sensitivity of the coastal environment, which supports clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on how these risks will be mitigated, controlled, or monitored.

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

Compounding these issues is the lack of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application obstructs a thorough evaluation of whether appropriate safeguards are in place to address pollution incidents. This deferral introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement of essential environmental safeguards is in direct conflict with the requirements established by the Environmental Impact Assessment regime. It is necessary for likely significant effects and mitigation to be assessed prior to consent; the absence of such information makes a lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application fails to provide a sufficient assessment of fisheries and marine life, lacking a robust evaluation of the ecological and socio-economic impacts. There is a concerning assumption that fishing activity can be displaced without any consequences. Notably, the application does not present evidence indicating that alternative fishing grounds are available, accessible, or capable of bearing additional pressure. This lack of information is critical, as such displacement could lead to overfishing in other areas, potentially impacting the local fishing fleet's economic stability. Without a detailed and evidence-based assessment, the ramifications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, especially due to the underwater noise anticipated from construction activities. The use of high-energy hammer piling over prolonged periods is expected to create disturbances across vast distances, adversely affecting species like dolphins. The anticipated disruption to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these effects without providing adequate supporting evidence.

Furthermore, there is a clear contradiction within the application that acknowledges the need for licences to allow harm to European Protected Species while simultaneously asserting that the impacts are negligible. This inconsistency casts doubt on the credibility of the assessment and raises serious questions about adherence to the Habitats Regulations, particularly concerning anticipated harm that requires legal authorisation.

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

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

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

TOURISM

The assessment of tourism impacts is fundamentally inadequate, failing to analyse the economic and social consequences for a vital sector on the Isle of Lewis. Tourism relies

heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it neglects to provide a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Tourism has seen substantial growth, rising 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. Nonetheless, the application does not model the potential impacts of seascape industrialisation and loss of environmental quality on Tourism Gross Value Added or broader economic resilience. Without such analysis, it is impossible to ascertain whether the development would generate a net economic benefit or jeopardise an established and expanding sector.

The assessment also fails to account for the significance of environmental quality in enhancing tourism, specifically the importance of unspoiled landscapes and dark skies to the visitor experience, as well as the growth of markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leading to a considerable gap in understanding the impacts on a recognised and burgeoning segment of the local economy.

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

From a policy standpoint, the application does not illustrate adherence to National Planning Framework 4, particularly concerning economic impact and the need to demonstrate net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector and fails to provide sufficient evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and recognise the island's economic dependency creates a significant evidential gap. This obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the statutory duties and standards required for sustainable development. This application mirrors the principal issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still does not provide a comprehensive or reliable evidential foundation for decision-making.

Critical gaps exist in baseline data, and the application continues to rely on an undefined design envelope. Furthermore, it leans on unspecified mitigation measures while neglecting vital impact pathways, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the effects on tourism. As a result, the Environmental Impact Assessment is incomplete, failing to facilitate a thorough understanding of the likely significant effects and residual impacts.

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

Moreover, the proposal stands in direct opposition to National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage. The application fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative impacts of offshore and onshore components have not been thoroughly evaluated, clouding the assessment of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and may be significantly detrimental. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistently reported. The necessary evidential standard to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

Additionally, the proposal would bring about considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and adverse effects on tourism indicate permanent consequences that cannot be satisfactorily mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The considerable deficiencies in information, alongside policy conflicts and unresolved environmental risks, obstruct the ability to reach a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or invoke the relevant regulatory provisions to mandate the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 9352E501

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 relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, rich cultural identity, and near-pristine environment. The scale and design of this application raise serious concerns regarding its adherence to statutory requirements, national policy, and sustainable development principles.

A thorough examination of the Environmental Impact Assessment Report and associated documentation reveals that critical environmental data is missing, and baseline information is both limited and inconsistent. Key aspects of the proposal are not clearly defined, and the flexible design framework leaves uncertainty regarding potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsupported by robust evidence.

There are substantial policy conflicts present as well. The application appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests necessary for consent and challenge the competent authority's ability to determine that the development is acceptable from a policy perspective.

Given the unprecedented scale of the proposal, with large turbines positioned close to the shoreline, there are significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy illustrates 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 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 application fails to demonstrate a proper assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, the application presents a narrative that outlines the project's evolution. This methodology does not establish that less harmful options have been

adequately identified, assessed, and chosen over more damaging alternatives.

Moreover, there is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Specifically, the application does not prove that the developer has seriously explored the option of positioning turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact further highlight the need for such analysis. The failure to include this evaluation undermines any conclusion regarding whether the proposed siting constitutes the least damaging choice.

The shortcomings also extend to the evaluation of cable routing and landfall options, with insufficient evidence provided to show that alternative routes have been thoroughly examined to avert or lessen impacts on sensitive receptors. This encompasses locations of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy and a comparative analysis signifies that mitigation by design has not been employed, with the focus instead being on post-design mitigation measures.

Consequently, the application does not prove that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This omission constitutes a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether there are less harmful and more suitable alternatives available. The lack of a comprehensive assessment of alternatives raises concerns regarding the sustainability and policy compliance of the proposal.

From a policy standpoint, this deficiency calls into question adherence to National Planning Framework 4, particularly with respect to the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species within the West Lewis coastal environment presents significant deficiencies. This area is known for its sensitivity and biological activity, yet the available baseline data is incomplete. The methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species, resulting in a lack of sound evidential basis for assessing impacts.

A critical shortcoming is evident in the assessment of otters, which are classified as a European Protected Species. The application inadequately recognises and evaluates their active utilisation of coastal regions for foraging and movement. This oversight means that the assessment does not account for their core foraging range and

behavioural patterns, leaving the potential effects of construction disturbance, noise, and increased activity unassessed. Consequently, any conclusions drawn about the lack of significant effects on this species are fundamentally undermined.

Further shortcomings are found in the evaluation of basking sharks. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological weaknesses imply that the conclusions regarding negligible or non-significant effects are based more on assumptions than on robust evidence. Moreover, the absence of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leaves uncertainty about the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application fails to satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not adequately identify or assess protected species. The uncertainty created through these omissions means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these considerations, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development presents significant flaws that undermine its conclusions, particularly concerning the severe decline of seabird populations on the west coast of the Isle of Lewis, which are internationally important. The application fails to provide the necessary evidence to demonstrate that these species will not be adversely affected, especially given that it is situated within critical foraging areas and migratory pathways. Important risks such as displacement, collision, and habitat loss have not been adequately evaluated.

A critical inconsistency arises within the application, where the developer claims no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which should only be necessary when significant harm is anticipated. This contradiction casts doubt on the credibility of the assessment, revealing that its conclusions lack support from solid evidence. The study does not adequately protect seabirds linked to designated sites, including the Lewis Peatlands and St Kilda, failing

to fully account for the significance of these feeding grounds. The reliance on modelling further introduces uncertainty, particularly regarding species like Kittiwakes and Fulmars, which are in sharp decline. Methodologies employed are likely to underestimate mortality rates, particularly due to incomplete baseline data and a lack of understanding regarding behavioural responses.

Additionally, the placement of turbines within an established migratory corridor poses an alarming risk by creating an obstacle along a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not sufficiently consider the long-term implications of persistent mortality within this corridor or the potential effects on species with small global populations.

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

Moreover, the identified deficiencies reflect a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to show that internationally significant seabird populations will not be adversely affected directly conflicts with national policy.

Overall, the assessment's reliability is compromised by internal contradictions, methodological flaws, and insufficient evidence. These issues hinder a thorough evaluation of the impacts and affirm that the application does not satisfy the legal requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, yet the assessment reduces them to mere static features, neglecting their ongoing use, significance, and the implications of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and overlooks their integral role in community life.

The assessment further neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the long-standing connection between the community

and the coastal environment. These elements are essential to the area's identity but are completely excluded from the evaluation, representing a considerable oversight. Without acknowledging these factors, the cultural impact of the proposed development cannot be accurately assessed.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing lacks the necessary transparency for a lawful assessment. While a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the complete report has not been made available. This absence of information creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's research.

Residents are reportedly experiencing stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not mere speculation. However, the failure to disclose the complete assessment prevents thorough scrutiny of these findings, limiting the capacity to evaluate their significance in the decision-making process.

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

with "cultural loss" noted in the developer's findings. Despite this recognition, such impacts have not been sufficiently integrated into the application or given adequate consideration. The withholding of the full Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. Understanding social, economic, and health impacts is crucial for developments of this scale, particularly those that may affect community character and functioning. Without the complete dataset, the application does not provide a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application fails to align with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the available evidence suggests existing adverse effects that have not been fully revealed. Without the full assessment, compliance with this policy cannot be verified.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission within the application and a failure to satisfy the evidential standards of the Environmental Impact Assessment framework.

In conclusion, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This hinders a lawful determination and confirms that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create a continuous and overwhelming industrial presence, which would fundamentally alter this character and lead to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, failing to adequately represent the magnitude of this visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness.

There are significant methodological concerns regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment. Additionally, the assessment does not adequately evaluate the

interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated assets fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting 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 sufficiently assessed within the application. From a policy standpoint, the proposal conflicts directly with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further diminishes any claims 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. Thus, the resulting change is fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation measures. In conclusion, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These 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 assessment related to construction and pollution risks is notably inadequate, failing to deliver the necessary detail to evaluate the likely environmental effects. The project entails considerable seabed preparation and installation operations 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 intended to be developed after consent, thereby hindering any meaningful assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures raises significant concerns, particularly due to the sensitivity 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 recognises risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, managed, or monitored.

There exists uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it remains 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 identified as sensitive in the wider assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the ability to evaluate whether suitable safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures effectively at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated before consent is granted, and the absence of such information renders a lawful determination impossible. Additionally, the application does not prove compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the absence of detailed management plans, and uncertainty regarding potential impacts culminates in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. The application fails to provide a robust evaluation of the ecological or socio-economic impacts, raising significant concerns about the protection and maintenance of these habitats and uses without substantial disruption. A critical issue lies in the assumption that fishing activities can be displaced without consequences. There is no evidence presented that alternative fishing grounds are available or capable of sustaining additional pressure. This lack of information is important, as the risk of overfishing in different areas poses potential wider economic implications for the local fleet.

Moreover, the proposal introduces considerable risks to marine species, particularly due to underwater noise from construction activities. The high-energy hammer piling anticipated over a prolonged period is expected to disturb marine life over extensive areas, notably affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious issues, yet the application inadequately addresses the severity of these impacts without adequate supporting evidence.

Additionally, there exists an inconsistency within the application regarding the need for licences to permit harm to European Protected Species, while simultaneously minimising the anticipated impacts as negligible. This contradiction calls into question

the credibility of the assessment and raises concerns regarding adherence to the Habitats Regulations, especially where harm is anticipated to a level necessitating legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is fundamentally lacking, as it does not fully address the impacts associated with what constitutes a single integrated project. The interconnection between the offshore turbines and the onshore components is crucial, yet they have been assessed in isolation, leading to a disjointed understanding of the environmental and socio-economic repercussions.

The onshore aspects encompass cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon reservoir and ecologically important habitat. The current application fails to deliver a thorough assessment of these impacts, which hinders the comprehension of the project's overall environmental implications.

By neglecting or postponing the evaluation of onshore effects, the application obstructs an accurate appraisal of cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively; however, the division of offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain inadequately examined.

There are substantial risks posed to sensitive environments, including machair systems and peatland areas that are safeguarded by policy. The application does not provide evidence that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This results in a significant gap regarding the protection of biodiversity.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that undermines the aims of renewable energy initiatives. The application does not sufficiently tackle this matter or show that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through operational croft land presents possible conflicts with established land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, prompting doubts about its feasibility and lawful execution.

From a policy standpoint, the failure to assess the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests 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 fragmentation of project components, the absence of a comprehensive assessment, and the lack of proof concerning environmental and land use impacts render this part of the application inadequate and untrustworthy, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks a crucial assessment of dark skies and nocturnal wildlife, representing a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in environmental quality, cultural identity, and the tourism sector. The introduction of permanent red aviation lighting, which would be visible over long distances, would create a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This is particularly important as dark skies are integral to the area’s identity and to emerging sectors like astro-tourism. The omission results in a significant gap in the landscape and environmental assessment.

More importantly, there is no analysis of how the proposal would impact nocturnal wildlife. Birds such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are especially sensitive to artificial lighting, which can disorient them and increase the risk of collisions. The application does not incorporate any lighting impact assessment or phototaxis study, leading to a failure to determine how aviation lighting may affect these species or contribute to increased mortality rates.

The use of daytime survey data in the ornithological assessment further complicates

the situation, as it does not account for nocturnal activity or related risks. Species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting; however, this risk has not been addressed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

Without a proper evaluation of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites may be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

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

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

TOURISM

The 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 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.

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: E375252D

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough examination of the Environmental Impact Assessment Report and accompanying materials, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. Situated off the west side of the Isle of Lewis, the development area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns are raised regarding the compatibility of the proposal's scale, proximity, and design with statutory obligations, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful assessment. There are critical gaps in environmental data, with baseline information that is both limited and inconsistent, while several key components of the proposal remain undefined. The application employs a flexible design framework, which complicates the understanding of potential significant effects, and the unspecified mitigation measures hinder any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts are evident, with the proposal appearing inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4. This inconsistency is particularly relevant concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the ability of the competent authority to determine the acceptability of the development in policy terms.

The unprecedented scale of the proposal raises serious concerns, particularly regarding the placement of large turbines in close proximity to the shoreline, which could significantly impact landscape capacity and create visual dominance. The combined effect of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and notable policy non-compliance underscores that the application is incomplete and unfit to support a lawful determination. In this context, the application of the precautionary principle is warranted.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the environmental impacts of the proposal. A notable issue is the reliance on a flexible Project Design Envelope, which lacks definitive turbine dimensions, layouts, or configurations. This absence creates uncertainty and hinders the effective application of worst-case scenario assessments. Consequently, the presented impacts may not accurately reflect the final construction, making it difficult for both the public and the competent authority to grasp the full extent of the potential environmental effects.

Additionally, the application is contingent upon mitigation measures, management plans, and monitoring strategies that are currently undefined. Seeking consent with the expectation that these environmental harms will be addressed at a later stage undermines the possibility of a meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which mandates that likely significant effects and mitigation measures be clearly established before determination.

There are also profound evidential shortcomings within the assessment, including gaps in baseline data and limitations in methodology, as well as a reliance on assumptions rather than concrete, site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects lack robust supporting data. The inadequacy of information prevents a clear understanding of cumulative and worst-case impacts and introduces a degree of scientific uncertainty that does not align with statutory requirements.

Moreover, these factors mean the application does not satisfy the evidential threshold established under the Habitats Regulations, which demands the exclusion of adverse effects beyond reasonable scientific doubt. The precautionary principle is thus engaged, especially in relation to protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it is impossible to verify that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation strategies, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough evaluation of environmental effects, meaning the competent authority lacks sufficient information to make an informed determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to its materially inadequate assessment of alternatives. Instead of providing a structured and reasoned comparison of realistic alternatives

based on their environmental effects, it offers a narrative account of project evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The significance of the West Lewis coastline and the critical role of proximity to shore in determining impact mean that the absence of such analysis hinders any conclusion that the proposed siting is the least damaging option.

The shortcomings also extend to the assessments of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been applied, with undue reliance instead placed on post-design mitigation measures.

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

From a policy standpoint, this deficiency 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 constitutes a material omission that leads to the conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment lacks a complete and reliable understanding of marine ecology and protected species within the West Lewis coastal environment, which is a biologically active and sensitive marine system. The methodologies used are insufficient and do not adequately capture the presence, behaviour, and habitat use of species, leading to an incomplete baseline data set. Consequently, this undermines the assessment's ability to provide a sound evidential basis for evaluating potential impacts.

A significant oversight in the application is the failure to properly recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. This gap in consideration regarding their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity on otters have not been adequately evaluated. Therefore,

the conclusions drawn about the absence of significant effects on this species are undermined.

Additionally, the assessment of basking sharks suffers from reliance on aerial surveys, which introduce considerable detection bias, particularly under Atlantic conditions. This method likely underestimates the presence of these sharks when compared to established land-based observations that indicate frequent use of the area. The failure to incorporate or properly consider such relevant data further weakens the reliability of the conclusions presented.

The methodological deficiencies result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of sufficient baseline data also hampers meaningful assessments of cumulative and indirect impacts, which includes seasonal variation and wider ecosystem interactions. This creates uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime and National Planning Framework 4, as it has not adequately identified or assessed protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, which engages the precautionary principle. In light of these issues, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

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

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

The identified deficiencies also suggest a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy. Collectively, these shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. Such flaws hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for a positive determination.

CONSTRUCTION AND POLLUTION RISKS

The assessment concerning construction and pollution risks is inadequate and lacks the necessary detail to evaluate the likely environmental effects. This proposal entails significant seabed preparation and installation works in a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application leans on mitigation and contingency measures that are to be defined after consent has been granted, which hinders any meaningful assessment of their sufficiency or effectiveness.

Particularly alarming is the reliance on vague future measures in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate details on how these issues will be prevented, controlled, or monitored.

There is also a lack of clarity concerning the scale and behaviour of sediment plumes that could arise from seabed disturbance and cable installation. In the absence of thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also encompasses potential effects on marine species and habitats that have been recognised as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application impedes the evaluation of whether adequate safeguards exist to address pollution events. This introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and proposed mitigation prior to granting consent; when such information is absent, a lawful determination cannot occur. Moreover, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Collectively, the lack of defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts result in a materially deficient assessment. These deficiencies impede 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 a thriving fishing industry. Unfortunately, the application does not adequately demonstrate how these essential uses and habitats will be safeguarded against significant disruption. The assessment of fisheries and marine life is lacking, failing to provide a thorough evaluation of the ecological or socio-economic impacts.

One major concern is the assumption that fishing activities can be displaced without any repercussions. The application does not present evidence that there are alternative fishing grounds that are accessible or capable of bearing the additional pressure. This critical omission raises serious questions, as such displacement could lead to overfishing in other areas, which may have broader economic ramifications for the local fishing fleet. Without a detailed and evidence-based examination, the potential impacts on fisheries and local livelihoods remain obscured.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated by construction activities. The prolonged use of high-energy hammer piling is likely to disturb marine life over significant distances, affecting species including dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application downplays the

seriousness of these effects, lacking sufficient supporting evidence.

There is also a glaring inconsistency in the application regarding the need for licences to permit harm to European Protected Species, which is acknowledged, while simultaneously classifying impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, particularly when harm is expected to occur at levels that warrant legal authorisation.

Furthermore, the assessment neglects to consider cumulative impacts from various pressures such as 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 region.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not illustrate that the development can coexist with existing marine users or that it will avoid unacceptable impacts on marine biodiversity, making it difficult to conclude that the proposal represents sustainable development.

The deficiencies in the assessment, particularly concerning fishing displacement, underestimation of acoustic impacts, and internal inconsistencies, render it incomplete and unreliable. These shortcomings impede a robust 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 vital to the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive “wall of light” effect along the western horizon. This change would significantly alter the night-time environment, yet the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the crucial role of dark skies in the local identity and the emerging tourism sectors, such as astro-tourism, this omission represents a significant gap in the overall landscape and environmental assessment.

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

The reliance on daytime survey data within the ornithological assessment further

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

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

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

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers or the overall economic contribution of tourism. This is particularly concerning given that tourism has experienced significant growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs. The sector accounts for as much as 16% of the island's economy. However, the application does not model the potential economic impacts of industrialisation on the seascape or the resulting loss of environmental quality. 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.

Moreover, the assessment neglects to consider the vital role of environmental quality in enhancing the tourism experience. Unspoiled landscapes and dark skies are crucial to attracting visitors, particularly in emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a notable gap in the understanding of the proposal's effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the lack of analysis regarding tourism impacts bears broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not

been evaluated, contrary to the requirements of the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short in demonstrating compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show a net benefit. It conflicts with strategic objectives that designate tourism as a priority growth sector and does not provide adequate evidence for the competent authority to assess the economic consequences of the proposed development.

Taken together, the inadequacies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic dependency create a substantial evidential gap. This gap hinders a thorough evaluation of the economic effects of the proposal and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as defined by statutory duties and national policy. It echoes the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application is positioned under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

A significant concern is the absence of a comprehensive and reliable evidential basis for the application's determination. Critical gaps exist in baseline data, and the continued reference to an undefined design envelope raises questions. Mitigation measures mentioned are not specified, and important impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment remains incomplete, hindering an understanding of potential significant effects and residual impacts.

The procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of the complete Social Impact Assessment is a material omission that inhibits the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These failures collectively render the application unsuitable for determination.

Additionally, the proposal contradicts the National Planning Framework 4 by failing to demonstrate adequate protection of biodiversity, natural landscapes, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable, nor does it demonstrate a net economic benefit due to the lack of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their implications for

peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing a lawful determination that impacts are acceptable.

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

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

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

Additional Comments

Although not a resident I have visited the west coast of Lewis on numerous occasions and consider the area to be a stunningly beautiful area. The proposed wind farm can do nothing but harm to this rare and special place. The size, scale and location of the proposal is staggeringly insensitive with motivations behind the scheme appearing to ride roughshod over the wishes of the islanders.

This in itself is a shameless approach being undertaken by 'Big Brother'.

We all understand the need to become more self-sufficient in meeting our energy needs, but surely there must be better options than this ill-thought out scheme.

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: 846170CC

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. It is founded on a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting substantial deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The project is situated off the west coast of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively untouched environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal raise serious questions about its alignment with statutory obligations, national policies, and the core principles of sustainable development.

The application lacks a solid evidential foundation for a lawful decision. There are significant gaps in critical environmental data, with baseline information being limited and inconsistent, leaving many key components of the proposal inadequately defined. The proposed flexible design framework obscures a clear assessment of potentially significant effects, and the anticipated mitigation measures, which remain unspecified, render 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 of negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are evident and considerable. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4, especially concerning biodiversity, natural areas, cultural heritage, and health and wellbeing. It does not adequately show that the national obligations to preserve biodiversity, safeguard climate interests, and maintain environmental integrity can be fulfilled. These discrepancies directly relate to the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal, with large turbines positioned very close to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must be invoked.

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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing related to the proposed development have not been adequately assessed, revealing a lack of transparency that is crucial for a

lawful evaluation. Although the developer conducted a Social Impact Assessment which involved focus groups with local residents, the full report remains unpublished. This absence creates a significant evidential gap that obstructs both public understanding and the competent authority's ability to grasp the full scope of social risks identified through the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposal, as indicated by available summaries. These impacts are based on actual engagement rather than speculation. However, the failure to release the complete assessment hampers thorough examination of these findings and restricts the assessment of their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with the developer's own findings noting a risk of "cultural loss." Nonetheless, these social impacts have not been adequately incorporated into the main application nor given the necessary consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is vital for developments of this magnitude, especially when community character and functioning could be at stake. Without the complete dataset, the application does not provide a thorough evidential foundation for evaluating the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development proposals are expected to foster positive health outcomes and avoid harm; however, available evidence suggests existing negative effects that have not been fully revealed. Consequently, without the complete assessment, compliance with this policy remains unproven.

The procedural consequences are considerable. The competent authority is unable to perform a robust evaluation of socio-economic and health implications due to the unavailability of the full Social Impact Assessment. This represents a significant omission within the application and a failure to fulfil the evidential requirements mandated by the Environmental Impact Assessment process.

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of ongoing adverse impacts, renders the evaluation incomplete and unreliable. This situation precludes a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines in close proximity to the West Lewis coastline threatens to fundamentally alter the area's character, which is defined by its open Atlantic horizon and a strong sense of remoteness. This industrial presence would result in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, as it does not adequately reflect the scale of change or the sensitivity of the receiving environment.

Visual impacts are understated, as the application fails to fully capture the magnitude of the visual change. The size and location of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the qualities that define naturalness and remoteness. Moreover, the assessment does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight risks underestimating the visual impact, thereby undermining the reliability of the assessment.

The interconnected relationship between landscape, seascape, and cultural heritage has not been sufficiently assessed. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a wider landscape setting that relies on visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated assets, the assessment fails to acknowledge their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The anticipated scale of change is inconsistent with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the absence of a robust worst-case assessment diminishes any claim of compliance with policy.

The impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. As a result, the change is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment inadequately represents the extent of impact, the sensitivity of

the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal exhibits significant deficiencies regarding the assessment of construction and pollution risks, which ultimately hampers a thorough evaluation of potential environmental effects. This application involves considerable seabed preparation and installation in a challenging Atlantic environment. However, it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be developed after consent has been granted, thereby obstructing any meaningful appraisal of their adequacy or effectiveness.

The application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, yet it fails to furnish adequate details on how these risks will be prevented, controlled, or monitored. This lack of clarity is especially alarming in light of the sensitive nature of the receiving environment, particularly the West Lewis coastline, which is home to clean coastal waters and significant habitats vulnerable to sediment disturbance and contamination.

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

The absence of specific emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application effectively inhibits an evaluation of whether adequate safeguards are in place to manage pollution incidents. This creates procedural risks and compromises the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the Environmental Impact Assessment regime requirements. Prior to consent, it is necessary to assess likely significant effects and related mitigations, and a lawful determination cannot be achieved in the absence of such information. Additionally, the application does not demonstrate compliance with policy obligations concerning environmental protection and water quality.

In summary, the incomplete assessment arising from the lack of defined mitigation measures, absence of detailed management plans, and uncertainty regarding potential impacts renders the overall evaluation of construction and pollution risks materially deficient. These failings underscore the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment concerning the onshore infrastructure is significantly incomplete and neglects to consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines are closely interconnected with the onshore works, yet they are assessed in isolation, leading to a disjointed approach that conceals the true extent of environmental and socio-economic repercussions.

The onshore aspects of the project include cabling that crosses protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes. Notably, this work involves excavation across deep peat areas, especially within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application fails to deliver a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's overall environmental footprint.

Excluding or postponing the assessment of onshore impacts restricts a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered collectively; however, the differentiation between offshore and onshore elements leads to a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

Additionally, there are considerable risks to delicate 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 evaluated or that suitable avoidance measures have been implemented, creating a significant evidential gap in terms of biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland results in the release of stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been undertaken, casting doubt on the feasibility and lawful execution of the project.

From a policy standpoint, the failure to assess the project in its entirety and to show protection for 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 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 absence of an assessment regarding dark skies and nocturnal wildlife is a serious oversight in the Environmental Impact Assessment. The West Lewis coastline is distinguished by its exceptionally dark skies, which play a crucial role in the region's environmental quality, cultural identity, and tourism potential. The proposed installation of permanent red aviation lighting, which would be visible over extensive distances, threatens to create a continuous and intrusive “wall of light” across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of consideration is particularly troubling given the significance of dark skies to the area's identity and to emerging tourism sectors, including astro-tourism. Such omissions result in a notable gap in the overall landscape and environmental assessment.

Furthermore, there is no evaluation of potential impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not include any assessment of lighting impacts or phototaxis studies, failing to address how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. For example, Kittiwakes may forage or migrate at night and are susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

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

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

TOURISM

The assessment concerning the impacts on tourism is inadequate and does not fully consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantitative evaluation of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and making up to 16% of the island's economy. However, the application fails to model the potential impacts that the industrialisation of the seascape and a decline in environmental quality may have on Tourism Gross Value Added and the broader economic resilience of the area. In the absence of such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or potentially harm an established and expanding sector.

Moreover, the assessment neglects to address the critical role that environmental quality plays in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and fostering emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a considerable gap in understanding the impacts on a recognised and growing segment of the local economy.

Given the context of an island community with limited economic diversification, the failure to assess the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated in accordance with the Islands (Scotland) Act 2018.

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

In summary, the combined shortcomings in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and recognising the island's economic dependency result in a significant evidential gap. This limits the ability to conduct a thorough evaluation of the economic effects and supports the conclusion that the application is lacking in completeness.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the criteria for sustainable development as outlined in statutory duties, national policy, and evidential standards. This application reiterates the fundamental issues that resulted in the

refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. Despite the current proposal being presented within a strengthened policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains deficient.

The application lacks a comprehensive and reliable evidential basis for its determination. There are significant gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and a failure to address important impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, inhibiting a thorough understanding of the likely significant effects and residual impacts.

Procedurally, there are notable failures as well. The absence of a compliant Island Communities Impact Assessment breaches the statutory requirements established under the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment constitutes a serious oversight. 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.

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

Uncertainties persist regarding environmental risks, which could be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in some instances. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of the impacts.

This proposal will lead to substantial and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and negative impacts on tourism will create permanent changes that cannot be mitigated to an acceptable level.

In summary, the application is both procedurally and substantively unsuitable for determination. The scale of informational deficiencies, combined with conflicts with policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, the competent authority must either refuse consent based on these grounds or invoke the necessary regulatory provisions to obtain 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 am submitting a formal objection to the proposed wind farm development on the Isle of Lewis.

As someone who has lived here my entire life and has built a business within the local town, I consider this proposal to be deeply concerning and, in many ways, an insult to the community it claims to benefit. Those of us who live and work here understand that the island's value lies not in industrial-scale development, but in its landscape, culture, and the small, independent economy that has been carefully sustained over time.

My primary concern is the impact on tourism, which underpins a significant portion of the island's economy. Visitors are drawn to Lewis because of its unspoiled environment, quiet roads, and sense of remoteness. The introduction of large-scale wind infrastructure risks fundamentally altering this perception. Despite this, there appears to be little meaningful assessment of how local tourism businesses will be affected, and no clear mitigation or support for those who may lose income as a result.

There is also a serious concern regarding the island's capacity to absorb the scale of development proposed. Infrastructure on Lewis is already limited. Housing is scarce, services are stretched, and roads are not designed for sustained increases in heavy construction traffic. The addition of a temporary workforce alongside existing tourist numbers will inevitably place strain on accommodation, healthcare, and day-to-day services. This has not been transparently or adequately addressed.

Traffic and road safety present further issues. The increase in construction vehicles, turbine transport, and ongoing maintenance traffic will add to roads that are already busy, particularly during peak tourist seasons with campervans and visitors unfamiliar with local driving conditions. This will impact both residents and the visitor experience.

The long-term environmental responsibility of the project also remains unclear. There is insufficient transparency regarding the full lifecycle of the turbines, particularly the disposal of blades and materials at end-of-life. Without clear, enforceable plans, this raises serious concerns about leaving future environmental burdens on the island.

While job creation is frequently cited, the reality appears to be that many roles will be short-term, with limited long-term employment opportunities for local people. It is also unclear how many of these jobs will realistically go to island residents, as opposed to external contractors. In contrast, the financial gains from such developments are likely to be concentrated among developers and investors, rather than distributed across the local community.

Unlike tourism—where a wide range of local businesses and individuals can participate

and benefit—this development offers limited opportunity for community-wide economic involvement. Tourism supports shops, accommodation providers, artists, and experience-based businesses. It allows people like myself to build a livelihood rooted in the island. This project does not offer the same.

The impact of the development has not been convincingly addressed. The combined effects of turbines, associated infrastructure, grid connections, and increased activity risk fundamentally changing the character of the island in a way that cannot be reversed.

In summary, this proposal places disproportionate strain on the island's environment, infrastructure, and existing economy, while offering uncertain and uneven benefits in return. As a young, lifelong resident who has invested in building a business here, I do not believe this development reflects the needs or priorities of the local community.

[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: 14E2A5EA

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment regimes. The objection arises from an examination of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the proposal raise serious questions about its alignment with statutory obligations, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis necessary for a lawful decision. Essential environmental data is absent, baseline information is inadequate and inconsistent, and critical elements of the proposal remain undefined. The flexible design framework used does not allow for a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a complete or informed assessment of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust support.

Substantial policy conflicts are evident, as the proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not establish that it can meet national requirements for the protection of biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and compromise the competent authority's ability to determine that the development aligns with policy expectations.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and incapable of sustaining a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings and fails to deliver a complete, transparent, or dependable account of the likely environmental consequences of the proposal. The adoption of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates a substantial level of uncertainty. This lack of clarity undermines the assessment's integrity, making it impossible to consistently apply a worst-case scenario. Consequently, the impacts outlined may not accurately represent the final development, hindering both public understanding and that of the competent authority regarding the true scale of environmental effects.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application submitted does not satisfy the necessary requirements of the Environmental Impact Assessment regime and the National Planning Framework 4 due to significant deficiencies in the assessment of marine ecology and protected species.

This inadequacy stems from the failure to fully identify and assess the presence and behaviour of ecological receptors within the West Lewis coastal environment, a region known for its biological activity and sensitivity. The baseline data provided is incomplete, and the methodologies employed do not accurately reflect species presence, behaviour, and habitat use.

A particularly notable gap in the assessment is the treatment of otters, a species protected under European law. The application neglects to adequately acknowledge their active use of coastal areas for foraging and movement. Consequently, the evaluation fails to consider the core foraging range and behavioural patterns of otters, leading to an insufficient assessment of potential impacts from construction disturbance, noise, and increased activity. This oversight significantly undermines any conclusions drawn regarding the absence of significant effects on this species.

Additionally, the evaluation of basking sharks reveals further methodological shortcomings. The reliance on aerial surveys is problematic as it introduces a significant detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the actual presence of basking sharks, especially when juxtaposed with land-based observations that indicate these waters are frequently used by the species. The failure to incorporate or adequately address such data culminates in an incomplete baseline that diminishes the reliability of the conclusions drawn.

Due to these methodological flaws, any conclusions suggesting negligible or non-significant effects rest on mere assumptions rather than on solid evidence. The lack of sufficient baseline data further impedes a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This scenario engenders uncertainty about the actual risks posed to marine species and habitats.

Considering these factors collectively, the presence of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies obstruct a robust evaluation of impacts on marine ecology and protected species and confirm that the application lacks a sufficient evidential foundation. Thus, in light of the introduced uncertainties that prevent the exclusion of adverse effects beyond reasonable scientific doubt, consent cannot be lawfully granted.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development is located 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. Unfortunately, the ornithological assessment accompanying the application is materially flawed, exhibiting significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to adequately demonstrate that these vulnerable species will not be adversely affected, particularly in light of the risks associated with displacement, collision, and habitat loss.

A fundamental contradiction exists within the application itself, as the developer claims there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that the conclusions drawn are not backed by the underlying evidence. Furthermore, the assessment lacks sufficient evidence to assure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected.

The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the inadequate understanding of the behavioural responses of these birds. The siting of turbines within a recognised migratory corridor introduces a considerable risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term implications of sustained mortality within this corridor, nor does it consider 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, paired with data gaps and limitations of the modelling approaches, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This necessitates the application of the precautionary principle and prevents a lawful conclusion in favour of consent.

Moreover, 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 convincingly show that internationally important seabird populations will not be adversely affected directly conflicts with national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and lack of robust evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community intertwine. However, the assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage merely as isolated and static assets. This approach neglects the ongoing social, cultural, and spiritual roles that these elements play within the community.

A significant shortcoming is the treatment of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight fails to acknowledge their continued use and meaning, and

disregards how development impacts their settings, leading to an incomplete evaluation of cultural effects.

Furthermore, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and its coastal environment. These elements are vital to the area's identity but have not been considered, resulting in a significant omission that impairs understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity akin to that of an Indigenous People. Yet, there has been no process of Free, Prior and Informed Consent, which diminishes the legitimacy of the assessment. This lack of meaningful engagement does not align with recognised principles for participation in decisions affecting cultural and environmental interests.

Moreover, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. 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 hinders lawful determination.

From a policy standpoint, these shortcomings conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly examined, leaving the application insufficient for a proper evaluation of the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is alarming and raises serious concerns. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap. This omission hinders both public understanding and the ability of the competent authority to grasp the full extent of the social risks that have been identified through the developer's research.

Residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are not merely speculative. Nonetheless, the failure to disclose the complete assessment prevents thorough scrutiny of the findings and restricts the ability to

evaluate their significance in the decision-making process.

Moreover, there is an evident perception that the proposal threatens community identity and cohesion, with the developer's own findings highlighting a risk of "cultural loss." Despite this, the impacts have not been adequately integrated into the main application or given the necessary weight. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency critically undermines the Environmental Impact Assessment process. For developments of this magnitude, a comprehensive understanding of social, economic, and health impacts is vital, especially where community character and functioning could be jeopardised. Without the complete dataset, the application fails to provide an adequate evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not illustrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must enhance positive health outcomes and mitigate harm; yet the available evidence points to existing adverse effects that remain undisclosed. The absence of the complete assessment makes it impossible to demonstrate compliance with this policy.

The procedural ramifications of this situation are significant. The competent authority is unable to perform a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission represents a critical flaw within the application and signifies a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. 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, seascape, and landscape is severely lacking, failing to adequately reflect both the sensitivity of the receiving environment and the scale of the proposed changes. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines close to the shoreline would result in a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

The proposal does not adequately convey the extent of this visual change. The proximity and scale of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and erode the defining attributes of naturalness and remoteness. Moreover, the assessment fails

to fully articulate the significance of these impacts in the context of such a sensitive landscape.

Methodological issues are also present in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, thus compromising the reliability of the assessment.

There is a notable deficiency in recognising the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are linked to the wider landscape through visual and spatial relationships to the Atlantic horizon. The assessment treats these important cultural assets as isolated rather than acknowledging their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape could sever these crucial relationships, transforming the context in which heritage assets are perceived and interrupting their connection to the natural horizon. This not only constitutes a visual impact but also represents broader cultural and spatial harm that has not been sufficiently assessed in the application.

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

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

Overall, the assessment fails to accurately portray the scale of impact, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings inhibit 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 significant seabed preparation and installation activities within a dynamic Atlantic environment. However, the assessment of construction and pollution risks is lacking in completeness and fails to provide the necessary detail for evaluating the likely environmental effects. Notably, there are no fully developed Construction

Environmental Management Plans or Pollution Prevention Plans. The application instead leans on mitigation and contingency measures that are to be developed after consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

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

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

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

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

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

FISHERIES AND MARINE LIFE

The 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 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 Environmental Impact Assessment is deficient as it entirely lacks an evaluation of dark skies and nocturnal wildlife, which constitutes a material omission. The West Lewis coastline is noted for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism. The proposed development would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Significantly, the application fails to assess the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly consequential given the relevance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The lack of such assessments creates a distinct gap in the overall landscape and environmental evaluation.

Moreover, there is no consideration of the potential impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit high sensitivity to artificial lighting, which can result in disorientation and an increased risk of collision. The absence of any lighting impact assessment or phototaxis study means there is no understanding of how aviation lighting may affect these species or contribute to higher mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and associated risks.

Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific night-time data leaves a critical void in comprehending ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse consequences. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not fulfilled, thereby invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, the omission contravenes National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. Additionally, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a crucial element of the overall setting.

In conclusion, the absence of assessments related to dark skies and nocturnal wildlife represents a significant evidential gap. The deficiency of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unsuitable for a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development, which is evident when assessed against statutory duties and national policy. This application mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short.

There are significant gaps in the evidential basis for making a determination on this application. The use of an undefined design envelope, the lack of specified mitigation measures, and the failure to address key impact pathways—such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism—are notable deficiencies. The Environmental Impact Assessment is incomplete, which hinders a comprehensive understanding of the likely significant effects or residual impacts associated with the proposal.

Furthermore, procedural failures are apparent. The omission of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment represents another serious oversight. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

In direct contradiction to National Planning Framework 4, this proposal does not

adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, which obscures potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with the proposal remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidence required to dismiss adverse effects beyond reasonable scientific doubt is lacking, which necessitates the application of the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would lead to substantial and irreversible changes 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 adversely affect tourism. These are permanent changes that cannot be mitigated to an acceptable level.

In light of the scale of information deficiencies, policy conflicts, and unresolved environmental risks, this application is both procedurally and substantively unsuitable for determination. The competent authority must refuse consent on these grounds or exercise the relevant regulatory provisions to require 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

My father in law was born in one of the last few habitable blackhouses in Lower Barvas before moving into a more modern “white house” built by his uncle right next to it back in the 1960s. These houses brought with them a brand new change in cultural norm and living style, with modern upgrades of comfort and ease rarely experienced by previous generations. This change would have been a much appreciated luxury for the Lewis folk bracing the elements and trials of island life.

What has not changed over the years, however, is the island’s natural beauty. Only when people leave the island and return again do they truly realise how rare and precious that untouched landscape is. The wide machair, the dark skies free from artificial light, the rich wildlife and the sense of space and quiet have remained largely unchanged for generations. It is a landscape that has shaped the identity, heritage and wellbeing of those who live here.

The proposed development threatens to fundamentally alter that landscape. From my father in law’s home in Lower Barvas, these turbines would be clearly visible on the horizon. At a proposed height of around 338 metres, with blades spanning greater than the wingspan of a Boeing 747, they would dominate the skyline of what has always been an unspoilt coastal view.

The area surrounding Lower Barvas is not only visually unique but ecologically sensitive. The nearby machair is internationally recognised for its rare wildflowers and as vital nesting habitat for ground nesting birds. Disturbance from large scale construction, increased noise, and ongoing industrial activity raises serious concerns for the delicate balance of this environment. The surrounding marine ecosystem, which supports seals, seabirds and other marine life, would also face disruption during construction and operation.

There is also deep concern regarding the impact of light pollution. The island's dark skies are one of its most treasured qualities. On clear nights the stars and, at times, the Northern Lights can be seen in breathtaking clarity. The addition of large numbers of turbines fitted with bright aviation warning lights would permanently alter the night sky, replacing darkness and natural wonder with a constant industrial glow visible for miles.

Equally troubling is the lack of clarity regarding the long term legacy of this project. While the turbines are proposed to operate for around 35 years, there appears to be no definitive plan for their removal or disposal once they reach the end of their lifespan. Without a clear and enforceable decommissioning strategy, there is a real risk that these enormous structures could remain in place long after they have ceased to function.

For generations, the people of Lewis have adapted to change while maintaining a deep respect for the land and sea that sustain them. Development has its place, but it should not come at the cost of permanently damaging landscapes, ecosystems and cultural heritage that cannot be replaced.

This coastline has remained largely unchanged since my father in law first looked out across it as a child. Decisions made today will determine whether future generations will inherit that same unspoilt horizon, or one dominated by industrial structures that can never truly be undone.

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: C190B7B6

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the wind farm raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

Fundamentally, the application lacks a sufficient evidential basis to support a lawful determination. There are critical gaps in environmental data, with baseline information proving limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The flexible design framework employed inhibits a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises concerns about their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not backed by adequate evidence.

The proposal presents clear and substantial conflicts with policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate that the national requirements for protecting biodiversity, climate interests, and environmental integrity will be fulfilled. These policy conflicts directly affect the statutory tests required for consent and weaken the ability of the competent authority to determine that the development is acceptable from a policy perspective.

The unprecedented scale of the proposal in this location, with large turbines placed in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and 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. Given these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is unreliable and incomplete. It lacks a full and transparent account of the likely environmental effects of the proposal. The proposal's use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions or configurations, introduces significant uncertainty. This prevents a consistent worst-case scenario application, undermining the assessment's integrity. As a result, the impacts presented may not accurately reflect the final development, leaving both the public and the competent authority unaware of the true extent of the environmental effects.

Moreover, the application relies on undefined mitigation measures, monitoring strategies, and management plans. Seeking consent based on the expectation that environmental harm will be addressed later does not allow for a meaningful evaluation of effectiveness or assessment of residual impacts. This deferral of crucial information to post-consent stages is unacceptable and contradicts the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

There are also critical evidential gaps, such as limitations in methodology and reliance on assumptions instead of site-specific evidence. This results in uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are concluded without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be aligned 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 triggers the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to comply with National Planning Framework 4, as it does not demonstrate that impacts have been fully assessed or that suitable safeguards are in place.

Overall, the combination of an undefined design envelope, unspecified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report untrustworthy. These deficiencies impede a lawful and robust assessment of environmental effects and leave the competent authority unable to make a determination based on the provided information.

ASSESSMENT OF ALTERNATIVES

The lack of a structured and comparative assessment of alternatives represents a significant deficiency in the application, undermining compliance with the Environmental Impact Assessment regime. It fails to provide a thorough evaluation of realistic alternatives based on environmental effects and instead offers only a narrative of project evolution. This approach does not adequately demonstrate that less harmful options have been properly identified or assessed in preference to more damaging solutions.

Furthermore, the application does not include a transparent or evidence-based comparison of different offshore locations, development scales, or design configurations. Specifically, it does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be reduced. The sensitivity of the West Lewis coastline is crucial, and the absence of analysis regarding proximity to shore prevents any conclusion that the proposed siting is the least damaging option.

Deficiencies in cable routing and landfall assessment are also evident, as there is insufficient evidence that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation through design has not been applied, leading to a reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hampers the competent authority's ability to determine whether less harmful and more appropriate alternatives exist. Without a comprehensive alternatives assessment, it cannot be established that the proposal is sustainable or compliant with policy.

From a policy standpoint, these inadequacies compromise alignment with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured assessment is a material omission that contributes to the overall conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally flawed, lacking a complete and 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 provided is inadequate, and the methodologies employed fail to effectively capture vital aspects such as species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Significant deficiencies are evident in the evaluation of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. The disregard for their core foraging range and behavioural patterns results in an incomplete evaluation of the potential impacts from construction activities, noise, and increased human activity. This oversight compromises any claims regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks displays considerable shortcomings,

particularly due to an overreliance on aerial surveys that create significant detection biases, especially in challenging Atlantic conditions. This methodology is likely to lead to an underestimation of basking shark presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to integrate or appropriately consider such data contributes to an inadequate baseline and diminishes the credibility of the conclusions drawn.

The methodological inadequacies in the assessment result in conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This situation generates considerable uncertainty about the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the standards set by the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to properly identify or evaluate protected species. The level of uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment, characterised by significant gaps in evidence and internal contradictions that seriously undermine its conclusions. The proposed development is situated within critical 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. The applicant fails to demonstrate, to the required evidential standard, that these species will not face adverse impacts.

The assessment exhibits a critical inconsistency; the developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises serious doubts about the assessment's reliability and suggests that the conclusions drawn are not underpinned by robust evidence.

Moreover, the assessment lacks sufficient evidence regarding seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, ensuring their protection from adverse effects remains unproven. The importance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces a level of

uncertainty, particularly for species like Kittiwakes and Fulmars, which are in severe decline. The methodologies employed risk underestimating mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor further exacerbates this situation, as it creates a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor, nor does it consider the potential effects on species with relatively small global populations.

Regulatory concerns arise as the application fails to meet the evidential threshold needed to assert there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and the limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This raises the precautionary principle, which precludes a lawful conclusion in favour of consent.

Additionally, the deficiencies noted demonstrate a lack of compliance with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to confirm that internationally important seabird populations will remain unaffected places the proposal at odds with national policy.

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These flaws hinder a thorough evaluation of impacts and lead to the conclusion that the application fails to meet the statutory requirements for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development lacks a thorough assessment of cultural heritage and community identity, treating the West Lewis coastline merely as a collection of isolated, static assets. This view fails to acknowledge the area as a living cultural landscape where environment, language, tradition, and community are deeply intertwined.

In particular, the treatment of significant sites such as the cemeteries at Dalmore, Bragar, and Barvas is a major shortcoming. These sites are not merely historical features; they serve as active places of burial and spiritual practice. However, the assessment categorises them without considering their ongoing use and the implications of development on their surroundings. This misrepresentation results in an incomplete evaluation of the cultural effects, neglecting their importance in community life.

Additionally, the assessment overlooks intangible cultural heritage, including the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity but are entirely omitted from the evaluation, creating a significant gap in

understanding the cultural impact of the development.

Moreover, there are notable concerns surrounding community rights and engagement. The Gaelic-speaking population, which embodies the distinct characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The absence of meaningful engagement compromises the validity of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

A critical procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community, preventing a lawful determination of the proposal.

From a policy standpoint, these inadequacies place the proposal at odds with the National Planning Framework 4, particularly regarding the protection of historic assets and sites. The neglect to consider both tangible and intangible heritage, along with the failure to recognise living cultural practices, signifies a clear departure from policy requirements.

Ultimately, the collective failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application lacks a sufficient foundation for determining the true cultural cost of the proposed development.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

Furthermore, the proposal is perceived to pose a direct threat to the community's identity and cohesion, with "cultural loss" noted in the findings submitted by the developer. Nevertheless, these critical impacts have not been adequately addressed within the main application, nor have they been given the consideration they merit. By

withholding the complete Social Impact Assessment, the developer obscures the genuine human and social costs of the development.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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 presents a significant concern due to the incomplete assessment of construction and pollution risks, lacking the necessary detail to properly evaluate potential environmental effects. This development requires substantial seabed preparation and installation works in a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are intended to be formulated post-consent, thereby obstructing any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures raises alarm, particularly considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of disturbance and contamination

from sediment. While the application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail regarding the prevention, control, or monitoring of these incidents.

There is also a notable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological implications of these impacts. This uncertainty extends to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the 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 for responding to pollution incidents. This introduces procedural risks and diminishes the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and appropriate mitigation are assessed prior to granting consent. The absence of such critical 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 deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainties surrounding potential impacts render the assessment materially inadequate. These shortcomings obstruct a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

on fisheries and local livelihoods remain unclear.

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to recognise the interconnected nature of the offshore turbines and onshore works. This fragmented evaluation obscures the full extent of the environmental and socio-economic impacts associated with this single integrated project.

Critical onshore elements include the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically sensitive habitat. The lack of a thorough assessment of

these impacts hinders a comprehensive understanding of the overall environmental footprint of the project.

By omitting or postponing the evaluation of onshore impacts, the application fails to facilitate an adequate assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together; however, the disaggregation 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 posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that these habitats have been fully evaluated or that appropriate avoidance measures are in place, indicating a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland may release stored carbon, leading to a potential carbon debt that contradicts the goals of renewable energy development. This issue is not adequately addressed in the application, which fails to prove that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, prompting doubts about deliverability and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks a critical evaluation of nocturnal wildlife and dark skies, representing a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the environmental quality, cultural identity, and tourism of the area. The introduction of permanent red aviation lighting, which would be visible from great distances, threatens to create an intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Moreover, the application fails to assess how this lighting will impact visual amenity,

landscape character, and the experiences of both residents and visitors. This is particularly concerning given the relevance of dark skies to the area's cultural identity and the development of astro-tourism. The neglect to consider these impacts creates a notable gap in the overall landscape and environmental assessment.

Equally alarming is the absence of any analysis regarding the effects on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, leading to disorientation and a heightened risk of collision. The application does not include a lighting impact assessment or a study on phototaxis, which means the potential adverse effects of aviation lighting on these species and their mortality rates are left unexamined.

The situation is further complicated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific night-time data leads to a critical inadequacy in understanding ecological impacts.

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

From a policy standpoint, this omission is at odds with National Planning Framework 4, which pertains to the safeguarding of natural places and environmental quality. Furthermore, it diminishes the broader evaluation 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 creates 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 related to the development proposal is inadequate and does not evaluate the economic and social effects on a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which relies heavily on these natural features. The application acknowledges that 86% of visitors are attracted by the scenery, but it fails to provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has experienced notable growth, increasing from £65 million in 2017 to over

£81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and potential decline in environmental quality might impact Tourism Gross Value Added or the broader economic resilience of the region. This lack of analysis makes it impossible to assess whether the development would yield a net economic benefit or harm a sector that is both established and expanding.

Furthermore, the assessment neglects the significance of environmental quality in promoting tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as the rising interest in nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this issue, resulting in a crucial gap in understanding the potential impacts on a recognised and developing segment of the local economy.

For an island community with limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been analysed as required under the Islands (Scotland) Act 2018.

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

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and considering the island's economic dependence create a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards required for sustainable development as set out in statutory duties, national policy, and evidential standards. It revisits the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

There are significant shortcomings in the evidential foundation necessary for a thorough evaluation. The data provided is incomplete, with notable gaps, including reliance on an unspecified design envelope and unelaborated mitigation measures. Additionally, there is a lack of consideration for vital impact pathways, such as nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism.

Consequently, the Environmental Impact Assessment is inadequate and does not facilitate a full understanding of the likely significant effects or residual impacts.

Procedural issues are also evident, particularly the absence of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of the full Social Impact Assessment constitutes a material omission. These failures hinder the ability of the competent authority to assess implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural sites, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and lacks evidence of net economic benefit due to insufficient tourism impact modelling. The assessment of cumulative impacts from offshore and onshore activities has not been sufficiently conducted, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the proposal are uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

Additionally, the project is set to cause significant and irreversible changes to a highly sensitive landscape. The industrial development along the Atlantic-facing coastline, loss of dark skies, disruption to cultural and visual connections, and negative impacts on tourism will result in permanent effects that cannot be adequately mitigated.

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

Additional Comments

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: 979D157D

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 marine licensing and Environmental Impact Assessment processes. The review of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the project raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential foundation for a lawful decision. There are gaps in critical environmental data, with baseline information being both limited and inconsistent, while key elements of the proposal remain unspecified. The reliance on a flexible design framework complicates the assessment of potential significant effects, and without specified mitigation measures, their effectiveness remains unclear. Consequently, the provided documentation does not offer a comprehensive understanding of the environmental, cultural, or community impacts. Assertions of negligible or non-significant effects lack adequate supporting evidence.

Moreover, the proposal demonstrates notable policy conflicts. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and public health. The application fails to show compliance with national requirements aimed at protecting biodiversity, climate considerations, and environmental integrity. Such conflicts are critical as they challenge the statutory tests required for consent and impede the competent authority's ability to deem the development acceptable within policy frameworks.

The proposal's unprecedented scale in this location, particularly with large turbines placed near the shoreline, raises substantial concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, dependence on undefined mitigation measures, evidential shortcomings, and clear policy discrepancies indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, and reliable evaluation of the proposed project's environmental consequences. The incorporation of a flexible Project Design Envelope, lacking definitive turbine dimensions, layouts, or configurations, creates considerable uncertainty, obstructing a consistent application of a worst-case scenario. This severely compromises the integrity of the assessment, obscuring the actual environmental impacts of the development, and depriving both the public and the competent authority of a clear understanding of the potential effects.

Consent is sought based on the premise that environmental harm will be mitigated at a later date, which is procedurally unacceptable. The proposal leans heavily on unspecified mitigation measures, monitoring strategies, and management plans that are yet to be defined. This deferral of critical information to post-consent phases undermines the principles of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before any determination is made.

Significant evidential shortcomings further complicate the situation, including gaps in baseline data and methodological limitations. Reliance on assumptions rather than site-specific evidence results in ambiguity concerning the scale and significance of impacts. The conclusions drawn, particularly those indicating negligible or non-significant effects, lack robust supporting data. This deficiency hampers the ability to assess cumulative and worst-case impacts and introduces scientific uncertainties that cannot align with statutory obligations.

The application consequently fails to meet the evidential threshold necessary under the Habitats Regulations, which is essential to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the dependence on an unspecified design envelope, the lack of defined mitigation strategies, and significant gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust evaluation of environmental effects, placing the competent authority in a position where it cannot adequately determine the application based on the information at hand.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is inadequate and does not fulfil the requirements of the Environmental Impact Assessment regime. The application fails to provide a structured comparison of realistic alternatives based on their environmental effects. Instead, it offers a narrative of project evolution, which does not adequately demonstrate that less harmful options have been properly identified and selected over

more damaging solutions.

There is a lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, where the impacts on visual aesthetics, ecology, and the coast would likely be lessened. Given the sensitivity of the West Lewis coastline and the significance of proximity to shore in assessing impact, the omission of this analysis prevents any conclusion that the proposed siting is the least damaging option available.

These shortcomings also extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive areas. This includes significant locations such as Barvas Cemetery, which holds cultural and spiritual importance. The absence of a clear strategy for avoidance and a lack of comparative analysis indicate that mitigation through design has not been implemented, resulting in an over-reliance on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The analysis of marine ecology and protected species in the application is fundamentally flawed, leading to an unreliable understanding of the ecological receptors present in the West Lewis coastal area. This region is characterised as a sensitive and biologically rich marine system; however, the baseline data provided is insufficient, and the methodologies employed fail to adequately identify species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid 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 assess their active utilisation of coastal zones for foraging and movement. This oversight, particularly regarding their core foraging range and behavioural patterns, results in an inadequate evaluation of potential impacts from construction disturbance, noise, and

increased human activity. Such deficiencies undermine any claims made about the lack of significant effects on this species.

Additionally, the assessment of basking sharks is incomplete due to an over-reliance on aerial surveys, which are subject to considerable detection bias, especially in the challenging conditions found in the Atlantic. This method is likely to underestimate the true presence of these sharks in the area, especially when compared to established observations from land-based sources that indicate regular use of these waters. The failure to incorporate or appropriately consider this data further weakens the baseline assessment and compromises the reliability of the conclusions drawn.

These methodological weaknesses lead to findings of negligible or non-significant effects being based more on assumptions than on solid evidence. Without adequate baseline data, there is also a lack of meaningful assessment concerning cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This situation fosters uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the obligations set out by the Environmental Impact Assessment framework and National Planning Framework 4, given that protected species have not been properly identified or assessed. The level of uncertainty introduced by these deficiencies prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is clear that consent cannot be granted lawfully.

In summary, the combination of insufficient baseline data, problematic methodologies, and unsupported conclusions leads to an unreliable assessment. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately indicating that the application does not provide a sound evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A striking contradiction arises within the application itself, where the developer claims that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. Such inconsistencies cast doubt on the reliability of the assessment, suggesting that the conclusions drawn are not supported by adequate evidence.

Furthermore, the assessment lacks sufficient proof that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The critical importance of these feeding grounds has not been fully recognised, and the reliance on modelling techniques introduces further uncertainty, particularly concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially when baseline data is incomplete and the behavioural responses of the species are not well understood.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy in assessing cultural heritage and community identity highlights a fundamental failure to recognise the West Lewis coastline as a dynamic cultural landscape where community, language, environment, and tradition are interconnected. The approach taken in the application is reductive; it treats heritage as isolated, static assets, overlooking their vital ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice. However, the assessment categorises them merely as static features, neglecting their continuous use, meaning, and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural impacts and fails to acknowledge the role these sites play in

community life.

Moreover, the assessment entirely overlooks intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the coastal environment and the community. These components are integral to the area's identity, yet they are absent from the analysis, representing a significant gap. Without incorporating these elements, the full cultural impact of the development remains unexamined.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity with attributes of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

Additionally, a critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment impedes the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination unlawful.

From a policy standpoint, these shortcomings put the proposal in direct conflict with National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, alongside a failure to recognise living cultural practices, represents a significant departure from policy requirements.

In summary, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts associated with the development remain inadequately assessed, leaving the application without a solid foundation to accurately determine the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The concerns surrounding the assessment of social impacts, health, and wellbeing highlight a critical deficiency in transparency that is necessary for a lawful evaluation. While a Social Impact Assessment was commissioned by the developer and included engagement with local residents, the absence of the full report creates a substantial evidential gap. This gap hinders both public understanding and the competent authority's ability to grasp the complete range of social risks identified through the developer's own investigations.

Residents have reported experiencing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts are not based on speculation, as they are derived from direct community engagement. Nonetheless,

the lack of access to the complete assessment prevents thorough scrutiny of these findings, thereby limiting the capacity to weigh their significance in the decision-making process.

Moreover, there is evidence that the proposal is viewed as a threat to community identity and cohesion, with the developer's own findings indicating a risk of "cultural loss." Despite the identification of such impacts, they have not been adequately incorporated into the main application nor given the appropriate consideration. By withholding the full Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is crucial for projects of this magnitude, especially when community character and functioning may be at stake. The application's failure to provide the complete dataset results in an inability to present a thorough evidential basis for evaluating the balance of benefits and detriments.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and avoid negative consequences; however, existing evidence points to adverse effects that have not been fully disclosed. Without access to the complete assessment, demonstrating compliance with this policy is impossible.

The procedural consequences are significant, as the competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment. This omission represents a material flaw within the application and a failure to meet the evidential criteria of the Environmental Impact Assessment framework.

In conclusion, the combination of not disclosing the full Social Impact Assessment and evidence of ongoing adverse impacts results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the understanding that the application lacks sufficient information to warrant support.

CONSTRUCTION AND POLLUTION RISKS

The assessment of pollution and construction risks related to the proposal is fundamentally lacking in detail, hindering any evaluation of potential environmental effects. Notably, the project entails extensive seabed preparation and installation works in a high-energy Atlantic environment. However, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is alarming. The application relies on undefined mitigation and contingency measures that are intended to be formulated post-consent, which severely limits the opportunity for a meaningful assessment of their adequacy or potential effectiveness.

This reliance on unspecified future measures is especially troubling due to the sensitive

nature of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and critical habitats that are susceptible to disturbances from sediment 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 strategies to prevent, control, or monitor these risks.

Moreover, there remains significant uncertainty regarding the scale and behaviour of sediment plumes that may result from the proposed seabed disturbance and cable installation. In the absence of comprehensive modelling and clearly outlined management strategies, the extent, duration, and ecological consequences of these impacts cannot be accurately assessed. This uncertainty extends to the potential effects on marine species and habitats identified as sensitive within the broader assessment framework.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether effective safeguards are in place to address potential pollution events. This not only introduces procedural risks but also undermines the ability of the competent authority to thoroughly assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Assessments of likely significant effects and their corresponding mitigation measures must occur prior to granting consent. The absence of this critical information undermines the legality of the determination process. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and the uncertainties surrounding potential impacts culminate in an assessment that is materially deficient. These significant shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents a concerning lack of evidence regarding the displacement of fishing activities, raising doubts about the assessment's validity. It assumes that existing fishing operations can be moved without consequences, yet fails to demonstrate the availability or accessibility of alternative fishing grounds. This oversight is particularly troubling as it could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. The absence of a clear, evidence-based evaluation means that the potential impacts on fisheries and the livelihoods dependent on them remain poorly understood.

Moreover, the risks posed to marine species are significant, particularly due to the

underwater noise generated during the construction phase. The high-energy hammer piling anticipated over an extended period is likely to disturb marine life over considerable distances, notably impacting populations such as dolphins. The application appears to downplay the predicted disturbance to a substantial proportion of the local bottlenose dolphin population, raising serious concerns that are not sufficiently supported by evidence.

There is also a noticeable inconsistency within the application regarding the need for licences to harm European Protected Species. While it acknowledges this requirement, it simultaneously claims that the impacts are negligible. Such contradictions undermine the credibility of the assessment and call into question compliance with the Habitats Regulations, especially when anticipated harm necessitates legal authorisation.

Additionally, the assessment fails to adequately account for cumulative impacts arising from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, it is impossible to ascertain the overall 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 provide evidence that the proposed development can coexist with existing marine users or avoid unacceptable effects on marine biodiversity, thus precluding any conclusion of sustainable development.

In summary, the assessment is marked by a lack of evidence concerning fishing displacement, an underestimation of acoustic impacts, and internal inconsistencies. These deficiencies collectively render the assessment incomplete and unreliable, hindering a thorough evaluation of the implications for marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include an evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The proposed development would introduce permanent red aviation lighting that would create an intrusive “wall of light” effect visible over long distances, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies for the area’s identity and for emerging tourism sectors, such as astro-tourism, this omission is particularly concerning. It indicates a clear gap in the overall landscape and environmental assessment.

Additionally, there is no consideration of the effects on nocturnal wildlife. Species like

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 absence of any lighting impact assessment or phototaxis study means the application does not consider how aviation lighting may affect these species or contribute to higher mortality rates.

This issue is compounded by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, but this 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 effects, it is impossible to ascertain whether protected species or designated sites would be adversely impacted. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and preventing a lawful determination.

From a policy perspective, these omissions conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They also undermine the broader evaluation of landscape and seascape impacts, as night-time character is an integral part of the environment.

Overall, the absence of an assessment regarding dark skies and nocturnal wildlife constitutes 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 presents a proposal that significantly lacks a thorough assessment of tourism impacts, particularly in regard to the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While it is stated that 86% of visitors are attracted by the scenery, the application does not provide a quantified analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution to the area.

In terms of economic significance, tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, with the sector supporting more than 1,000 jobs and constituting as much as 16% of the island's economy. However, the application neglects to model the potential impacts on Tourism Gross Value Added and the wider economic resilience resulting from the industrialisation of the seascape and a decline in environmental quality. Without this critical analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or adversely affect an established and expanding sector.

Moreover, the assessment overlooks the crucial role of environmental quality in bolstering tourism, including the significance of unspoiled landscapes and dark skies for visitor experiences. This is particularly relevant for burgeoning markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates the shortcomings of the evaluation, leaving a notable gap in understanding the effects on this recognised and growing segment of the local economy.

Within the context of an island community that experiences limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been sufficiently examined, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. Furthermore, it contradicts strategic objectives that designate tourism as a priority growth sector and fails to furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the collective deficiencies in quantifying tourism impacts, assessing the environmental drivers influencing visitor behaviour, and acknowledging the island's economic reliance culminate in a substantial evidential gap. This lack of comprehensive evaluation significantly hampers the ability to assess the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

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

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

wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct opposition to National Planning Framework 4, the proposal does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as it does not include tourism impact modelling. Furthermore, the cumulative effects of offshore and onshore components have not been sufficiently evaluated, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and impeding a lawful conclusion regarding the acceptability of impacts.

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

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

Additional Comments

I am not opposed to renewable energy or to responsible development. What I oppose is the disproportionate scale of these proposals, the lack of meaningful local benefit, and the risk of irreversible damage to the landscape, ecology, and cultural identity of the islands. The Western Isles are already carrying more than their fair share of energy infrastructure relative to population, and the cumulative impact is being overlooked.

For us, this is not a policy debate. It is about the integrity of the place we call home. We returned here because we believed in the future of the islands. These wind farm proposals, in their current form, threaten that future and the stability we worked so hard to rebuild.

I ask that this personal impact be taken seriously, and that decision-makers recognise the real human cost of transforming the islands into an industrial energy landscape.

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: C2612B3C

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for consideration under the relevant marine licensing and Environmental Impact Assessment regimes. It is grounded in a thorough examination of the Environmental Impact Assessment Report and accompanying documentation, revealing material deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the scale, proximity, and design of the project, particularly its alignment with statutory requirements, national policy, and the tenets of sustainable development.

The application does not present a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, with baseline information being both limited and inconsistent. Moreover, significant aspects of the proposal remain undefined, and the use of a flexible design framework hinders a clear assessment of potential significant effects. The reliance on unspecified mitigation measures raises questions about their effectiveness, leading to an inability to fully understand the environmental, cultural, or community impacts. Consequently, claims suggesting negligible or non-significant effects lack robust evidential support.

There are evident and substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to prove that national requirements to protect biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts directly impact the statutory tests required for consent and compromise the capacity of the competent authority to determine the acceptability of the development in policy terms.

Unprecedented in scale for this location, the proposal involves large turbines situated in close proximity to the shoreline, which raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment fails to adequately identify and evaluate protected species, specifically otters, which are a European Protected Species. The application does not recognise their foraging and movement patterns along the coast. This oversight means that the potential impacts from construction activities, noise, and increased human presence have not been properly assessed. Consequently, the conclusions regarding the lack of significant effects on otters are not credible.

The methodologies used in the assessment are also problematic, particularly in relation to basking sharks. Aerial surveys are relied upon, which can create a significant detection bias, especially under Atlantic conditions. This approach is likely to underestimate the presence of basking sharks, especially when compared to established observations from land that show frequent use of these waters. The failure to properly consider this data leads to an incomplete understanding and compromises the conclusions drawn.

There are broader implications arising from these methodological deficiencies. The conclusions that suggest negligible effects are based on assumptions rather than strong evidence. Furthermore, the lack of comprehensive baseline data limits the ability to assess cumulative and indirect impacts on marine species, particularly considering seasonal variations and the interactions within the wider ecosystem. This introduces uncertainty about the actual risks to marine habitats and species.

From a regulatory viewpoint, the application does not adhere to the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4. The failure to adequately identify and assess protected species means that uncertainties about adverse effects cannot be dismissed with reasonable scientific certainty, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

Overall, the assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a solid evidential basis.

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.

TOURISM

The proposed development has not adequately assessed the impacts on tourism, which is crucial to the economy of the Isle of Lewis. With tourism revenue having risen 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, the failure to evaluate how large-scale offshore infrastructure might influence visitor numbers and behaviour is a

significant oversight. The application acknowledges that 86% of visitors are attracted by the scenery but lacks a quantitative analysis of how this industrialisation might affect the overall economic contribution of tourism.

Furthermore, the assessment neglects the vital role of environmental quality in sustaining tourism. Key factors such as unspoiled landscapes and dark skies significantly enhance visitor experiences, particularly in emerging sectors like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment highlights a serious gap in understanding how the proposed development could adversely impact these crucial aspects of the local tourism economy.

In an island community with limited economic diversification, the lack of an impact assessment on tourism carries broader implications for local employment, businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities of the island have not been adequately addressed, as required under the Islands (Scotland) Act 2018.

Policy-wise, the application falls short of demonstrating compliance with National Planning Framework 4, especially regarding economic impact and the need to show a net benefit. It fails to align with strategic objectives that identify tourism as a priority growth sector and does not 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 influencing visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This gap hinders a thorough evaluation of the economic effects, reinforcing the notion that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal illustrates a significant failure to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application revisits the central issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, which was deemed unacceptable due to the extent of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

There is an evident lack of a comprehensive and reliable evidential basis for decision-making within this application. Notable gaps exist in baseline data, the proposal relies on a vague design envelope, mitigation measures remain unspecified, and crucial impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications have not been addressed. Consequently, the Environmental Impact Assessment is incomplete and does not provide a full understanding of potential significant effects or residual impacts.

Moreover, procedural shortcomings are apparent. The failure to provide a compliant Island Communities Impact Assessment contravenes statutory obligations as outlined in the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a complete Social Impact Assessment is a significant oversight. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal stands in direct opposition to the National Planning Framework 4. It lacks evidence of biodiversity protection, preservation of natural environments and cultural heritage, acceptable health and wellbeing impacts, and fails to demonstrate a net economic benefit due to the absence of tourism impact analysis. The cumulative effects of both offshore and onshore components have not been adequately evaluated, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent with each other. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

Additionally, the proposal would induce considerable and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism signify permanent impacts that cannot be effectively mitigated.

In summary, the application is both procedurally and substantively unsuitable for determination. The extensive deficiencies in information, coupled with policy inconsistencies and unresolved environmental risks, hinder the possibility of a lawful and evidence-based decision. The competent authority must either deny consent based on these grounds or utilise relevant regulatory provisions to demand 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.

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: 65B7E11A

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and supporting documentation has identified several significant deficiencies in material planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a significant absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, key aspects of the proposal remain ill-defined. The use of a flexible design framework obscures a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the available documentation fails to offer a comprehensive or informed assessment of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are evident and substantive conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements intended to protect biodiversity, climate interests, and environmental integrity. These policy conflicts directly impact the statutory tests required for consent, thus undermining the ability of the competent authority to deem the development acceptable within policy parameters.

The scale of this proposal is unprecedented for the location, with large turbines positioned close to the shoreline. This raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several critical deficiencies that raise concerns about its reliability and transparency regarding the environmental

effects of the proposed development. A significant issue is the adoption of a flexible Project Design Envelope, which lacks specific details about turbine dimensions, layouts, or configurations. This ambiguity introduces substantial uncertainty and hinders the ability to apply a worst-case scenario consistently. Consequently, the reported impacts may not accurately reflect the actual development, leaving both the public and the competent authority unable to fully comprehend the environmental implications.

Moreover, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that are yet to be established. Seeking consent on the premise that environmental harm will be addressed in the future diminishes the opportunity for a meaningful evaluation of the effectiveness of these measures and the assessment of any residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and undermines the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly delineated before determination.

Additionally, there are significant gaps in the evidence presented, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainties surrounding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainties that conflict with statutory requirements.

As a result, the application does not meet the evidential standards necessary under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes obligations pertaining to biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and thorough evaluation of environmental effects, leaving the competent authority ill-equipped to make a well-informed decision based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application significantly fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly regarding the assessment of alternatives. It lacks a structured and reasoned comparison of realistic alternatives based on their environmental effects, instead providing a narrative of project evolution. This approach does not adequately demonstrate that less harmful options have been

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

Furthermore, the absence of a transparent, evidence-based comparison of alternative offshore locations, development scales, and design configurations raises serious concerns. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. The West Lewis coastline's sensitivity and the critical role of proximity to shore in assessing impact make this lack of analysis particularly detrimental. Consequently, it is impossible to determine that the proposed siting is indeed the least damaging option available.

The shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The failure to establish a clear avoidance strategy and the absence of comparative analysis indicate a reliance on post-design mitigation measures rather than applying mitigation by design.

As a result, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This is a failure to adhere to the established mitigation hierarchy and leaves the competent authority unable to ascertain whether more appropriate and less harmful alternatives exist. Without a comprehensive alternatives assessment, it cannot be claimed that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially in the context of safeguarding natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant omission that further substantiates the conclusion that the application has not been adequately evaluated, thus failing to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species presented in the application is fundamentally flawed and cannot be relied upon to provide an accurate understanding of the ecological receptors in the West Lewis coastal area. This marine environment is both highly sensitive and biologically vibrant, yet the baseline data is insufficient and the methodologies used do not effectively capture essential aspects of species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a robust evidential basis for determining the potential impacts.

Significantly, the assessment fails to appropriately recognise the presence of otters, a species protected under European law, in relation to their foraging and movement along coastal regions. The oversight in accounting for their core foraging range and behavioural patterns means that the potential impacts from construction disturbances, noise, and increased activity have not been thoroughly evaluated. This oversight

undermines any claims regarding the absence of significant impacts on otters.

In addition, the assessment of basking sharks reveals further shortcomings, particularly due to the reliance on aerial surveys which are subject to substantial detection bias, especially under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, particularly when compared to established land-based observations that indicate regular usage of these waters. The exclusion or inadequate consideration of such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological deficiencies lead to conclusions regarding negligible or non-significant effects being rooted in assumptions rather than solid evidence. Furthermore, the lack of adequate baseline data obstructs a meaningful examination of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This generates uncertainty surrounding the real level of risk to marine species and habitats.

From a regulatory viewpoint, the application does not comply with the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to accurately identify and assess protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

Overall, the combination of insufficient baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine ecology and protected species and reinforce the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the application is materially flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its conclusions. Despite the location of the development within key foraging areas and migratory pathways, the application fails to adequately demonstrate that these species will not be adversely affected. The assessment does not robustly evaluate critical issues such as displacement, collision risk, or habitat loss.

A key contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions lack sufficient support from the underlying evidence. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The significance of these

feeding grounds is inadequately addressed, and the reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

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

From a regulatory standpoint, the application does not meet the evidential threshold needed to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering the ability to reach a lawful conclusion in favour of consent.

Moreover, the deficiencies noted reflect a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable, due to internal inconsistencies, methodological weaknesses, and insufficient evidence. Such shortcomings hinder a robust evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage along the West Lewis coastline is fundamentally flawed, failing to recognise it as a living cultural landscape where the environment, language, tradition, and community are interwoven. The application adopts a narrow perspective that reduces heritage to isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight disregards their continued use, meaning, and the impact that development could have on their setting. As a result, the evaluation of cultural effects is incomplete and ignores their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These elements are crucial to the area's identity, yet they are

entirely overlooked, resulting in a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been engaged through a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

Another critical failure is the omission of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

These deficiencies place the proposal in direct conflict with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to address both tangible and intangible heritage, alongside the disregard for living cultural practices, marks a clear deviation from policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural values, community rights, and adherence to statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding social impacts, health, and wellbeing in this application is significant and undermines the necessary evaluation process. While the developer has conducted a Social Impact Assessment that involved local residents through focus groups, the full report remains unpublished. This creates a serious evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research.

Available summaries reveal that local residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct feedback from the community and are not mere speculation. However, without access to the complete assessment, it is impossible to scrutinise these findings fully, which limits the capacity to evaluate their significance in the decision-making process.

Additionally, there are indications that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Unfortunately, these concerns have not been adequately included in the main application or afforded the necessary weight. The failure to disclose the complete

Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency further complicates the Environmental Impact Assessment process. Understanding the social, economic, and health implications is vital for projects of this magnitude, especially when considering potential effects on community character and functioning. The application's omission of the full dataset results in an insufficient evidential basis to weigh the benefits against the harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid causing harm, yet the evidence available suggests that adverse effects already exist and have not been fully disclosed. Without the complete assessment, it cannot be shown that the application complies with this policy.

The procedural consequences of this situation are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation due to the absence of the full Social Impact Assessment. This gap represents a material omission in the application and fails to satisfy the evidential requirements set out by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the impacts on seascape, landscape, and visual elements is insufficient. It does not properly consider the extent of change or the sensitivity of the environment. The West Lewis coastline features an open Atlantic horizon and an undeveloped character, which contributes to a strong sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would create an industrial presence that alters this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to accurately depict the scale of visual change. The turbines' size and proximity mean they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would harm visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not adequately communicate the level of impact or its significance within such a sensitive landscape.

Methodological issues arise from the choice and presentation of visual viewpoints. It appears that some viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites

and high-value landscapes. This suggests a risk that the visual impact has been underestimated, compromising the assessment's reliability.

Another notable flaw is the lack of an evaluation of the connections between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as separate entities, failing to acknowledge their interdependence, which results in an incomplete analysis of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal contradicts the National Planning Framework 4, particularly regarding the protection of natural areas and historic assets. The extent of change does not align with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of compliance with policy.

Moreover, the identified impacts cannot be effectively mitigated. Given the turbines' size, height, and proximity, their presence would be dominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation activities in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is inadequate, lacking the necessary detail to assess the potential environmental impacts. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, which results in a reliance on mitigation and contingency measures that are to be formulated post-consent. This approach hinders any meaningful evaluation of their potential effectiveness or adequacy.

Given the sensitivity of the receiving environment, this reliance on unspecified future measures raises serious concerns. The West Lewis coastline is home to clean coastal waters and significant habitats that are particularly susceptible to sediment disturbance and contamination. The application identifies risks, including sediment mobilisation and possible chemical or oil spills, yet fails to provide comprehensive

details on preventative, control, or monitoring strategies for these risks.

Moreover, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes generated by seabed disturbance 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 affects potential repercussions for marine species and habitats that have already been recognised as vulnerable within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the assessment of whether adequate safeguards are in place for responding to pollution incidents. This introduces procedural risks and weakens the competent authority's capacity to evaluate environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements stipulated by the Environmental Impact Assessment framework. It is essential that likely significant effects and mitigation strategies are evaluated prior to consent. The absence of this information renders a lawful determination impossible. Furthermore, the application does not adequately demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially incomplete. These shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is not sufficiently robust.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a vibrant marine ecosystem and an active fishing industry. However, the application fails to adequately evaluate the ecological or socio-economic impacts of the proposed development, raising immediate concerns about the potential disruption to these vital resources. It is alarming that the assessment makes the assumption that fishing activities can be displaced without any consequences, yet it provides no evidence to support the availability or accessibility of alternative fishing grounds that could sustain the additional pressure. This significant omission risks overfishing in other areas and poses wider economic threats to the local fishing fleet. Without a thorough, evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling expected to take place over a prolonged period is likely to disturb marine life across

substantial distances, with species such as dolphins at risk. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises profound concerns. Alarmingly, the application downplays these potential impacts without providing sufficient supporting evidence.

Additionally, there exists a troubling inconsistency within the application. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously categorises such impacts as negligible. This contradiction not only undermines the credibility of the assessment but also raises serious concerns about compliance with the Habitats Regulations, especially where harm necessitating legal authorisation is anticipated.

The assessment also neglects to take into account the cumulative impacts that result 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 fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application raises serious concerns regarding the routing of infrastructure through active croft land, which introduces potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, leading to questions about the deliverability and lawful implementation of the project.

The assessment of onshore infrastructure is significantly incomplete, failing to recognise the interconnectedness of the offshore turbines and onshore works. This separation results in a fragmented approach that obscures the full scale of environmental and socio-economic impacts. The onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. Excavation is planned across areas of deep peat, particularly within Barvas Moor, which is both a significant carbon store and an ecologically sensitive habitat. The lack of a comprehensive assessment hinders a full understanding of the overall environmental footprint of the

project.

Furthermore, by excluding or deferring the assessment of onshore impacts, the application does not allow for proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are considered collectively; however, the distinct treatment of offshore and onshore elements results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities.

There are also considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application fails to demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, highlighting a clear evidential gap in relation to biodiversity protection.

In addition, the proposal raises critical issues concerning carbon balance. Disturbing peatland can release stored carbon, potentially creating a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains advantageous.

From a policy standpoint, the failure to assess the project as a whole, along with the inability to demonstrate adequate protection of peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The lack of evidence to show that impacts can be avoided or mitigated further diminishes the application's reliability.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment contains a significant gap, as it fails to address the crucial aspects of dark skies and nocturnal wildlife. The West Lewis coastline, known for its exceptionally dark skies, is vital for environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that would create a persistent and disruptive "wall of light" across the western horizon, fundamentally altering the night-time environment.

The application neglects to evaluate how this lighting impacts visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the role of dark skies in the area's identity and the potential growth of sectors such as astro-tourism. This failure to assess such impacts results in a clear deficiency in the overall landscape and environmental evaluation.

Moreover, there is a lack of consideration for the effects on nocturnal wildlife. Certain

species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are notably sensitive to artificial lighting, which can lead to disorientation and a heightened risk of collisions. The absence of any lighting impact assessment or a study on phototaxis means there is no evaluation of how aviation lighting might affect these species or increase mortality rates.

The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not adequately capture nocturnal activities or associated risks. Other species, such as Kittiwakes, which may forage or migrate during the night, are equally at risk of disorientation from artificial lighting, yet this has not been assessed. Without site-specific night-time data, the understanding of ecological impacts remains critically deficient.

Assessing nocturnal impacts is essential for determining whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, the absence of this assessment contradicts the National Planning Framework 4's directives regarding the protection of natural places and environmental quality. Furthermore, it diminishes the overall evaluation of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

In summary, the lack of any evaluation concerning dark skies and nocturnal wildlife represents a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of substantiating a lawful determination.

TOURISM

The assessment of the tourism impacts related to this application is significantly lacking. It does not adequately evaluate the economic and social effects on a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and the sense of remoteness. Although the application states that 86% of visitors are attracted by scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Tourism has seen considerable growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application fails to model how the potential industrialisation of the seascape and loss of environmental quality could affect Tourism Gross Value Added and broader economic resilience. Without this analysis, it is unclear whether the development would result in a net economic benefit or harm a vital and growing sector.

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

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

From a policy viewpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the obligation to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, providing insufficient evidence for the competent authority to assess the economic ramifications of the proposal.

All these factors combined lead to a significant evidential gap due to the failure to quantify tourism impacts, evaluate environmental influences on visitor behaviour, and consider the island's economic dependency. This results in an inadequate 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 represents a significant shortfall in meeting sustainable development criteria when evaluated against statutory obligations, national policy, and evidential requirements. It echoes the principal concerns that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Presenting the application under a more stringent policy framework, it fails to adequately address issues such as biodiversity, peatland safeguarding, landscape preservation, and community wellbeing.

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

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties established under the Islands (Scotland) Act 2018. Additionally, the failure to provide a comprehensive Social Impact Assessment represents a significant omission. These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural

identity, and economic resilience, rendering the application unfit for determination.

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

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

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

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

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

Additional Comments

Being a native of Lewis I think it is ridiculous that people think a small community will be a pushover. Please don't spoil this unspoilt landscape with horrendous structures. You don't have to live here but we do.

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: ACE57E52

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under marine licensing and Environmental Impact Assessment regulations. The objection arises from an examination of the Environmental Impact Assessment Report and associated documentation, highlighting material deficiencies in planning, environmental considerations, cultural factors, and procedural adherence. The project is proposed off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine natural environment, and strong cultural heritage. Concerns about the proposal's scale, proximity to the coast, and design raise 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 is an absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key components of the proposal remain undefined. The flexible design framework complicates the assessment of likely significant impacts, and the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation fails to provide a complete or informed understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by solid evidence.

There are significant policy conflicts evident in the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and public health and wellbeing. The application does not convincingly demonstrate compliance with national standards for protecting biodiversity, climate concerns, and environmental integrity. These discrepancies directly impact the statutory tests for consent and compromise the competent authority's ability to determine whether the development is acceptable within policy guidelines.

The proposal's scale is unprecedented for this area, with large turbines situated close to the shoreline, raising serious concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation strategies, evidential gaps, and clear policy violations illustrates that the application is incomplete and unsuitable for lawful approval. Under these circumstances, the precautionary principle should be invoked.

ASSESSMENT OF ALTERNATIVES

The application presents a significant inadequacy in the assessment of alternatives, failing to satisfy the statutory requirements of the Environmental Impact Assessment regime. It offers a narrative account of project evolution rather than a structured, reasoned comparison of realistic alternatives based on their environmental effects. This method does not demonstrate that less harmful options have been adequately identified, assessed, and selected in favour of more damaging solutions.

A transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations is notably absent. Specifically, the application does not establish that the developer has seriously contemplated placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. 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 analysis precludes any conclusion that the proposed siting is the least damaging option.

The deficiencies further extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and a comparative analysis suggests that mitigation by design has not been utilised, leading to a reliance on post-design mitigation measures.

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

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission that 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 is fundamentally inadequate and fails to provide a complete or trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This area is characterised by high sensitivity and biological activity; however, the baseline data is insufficient, and the methodologies used do not adequately capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant shortcoming is the treatment of otters, a species protected under

European law. The application does not adequately recognise or assess the active utilisation of coastal areas by otters for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an inadequate evaluation of the potential impacts of construction disturbance, noise, and increased activity. This oversight undermines any assertions regarding the absence of significant effects on this species.

Additional concerns arise concerning the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This method is likely to result in an underestimation of the species' presence, especially when compared to established land-based observations that indicate regular use of these waters. The failure to incorporate or adequately consider such relevant data results in an incomplete baseline and diminishes the reliability of the conclusions reached.

The limitations in methodology mean that assertions of negligible or non-significant effects are grounded in assumptions rather than in robust evidence. The lack of sufficient baseline data further complicates the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk to marine species and their habitats.

From a regulatory standpoint, the application does not conform to the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or evaluated. The introduction of uncertainty prevents the dismissal of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, lawful consent cannot be granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal is fundamentally flawed, exhibiting substantial gaps in evidence and inconsistencies that undermine its conclusions. Key foraging areas and migratory pathways, particularly along the west coast of the Isle of Lewis, support internationally important seabird populations, many of which are already experiencing declines. However, the application fails to demonstrate, to the necessary evidential standard, that these species will not be adversely affected by the development. The implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

There exists a significant contradiction within the application. The developer concludes

that there are no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented.

Moreover, the assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately considered, and reliance on modelling approaches introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, particularly given the incomplete baseline data and a lack of comprehensive understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents additional significant risks, effectively creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert 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 invokes the precautionary principle, which precludes a lawful conclusion that would support consent.

Additionally, these deficiencies represent a failure to comply 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 be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The 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 proposed development of large-scale turbines close to the West Lewis coastline threatens to fundamentally alter the character of this sensitive environment. This area is characterised by its open Atlantic horizon, undeveloped landscape, and strong sense of remoteness. The introduction of such industrial structures would create a continuous and dominant presence along the shoreline, leading to a permanent and irreversible transformation of the landscape.

The assessment provided does not sufficiently reflect the magnitude of the visual changes anticipated. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations, significantly impacting visual amenity and diminishing the qualities of naturalness and remoteness that define the region. The assessment fails to convey the true level of impact and its significance, given the sensitivity of the landscape involved.

Moreover, there are notable methodological shortcomings in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the potential visual impact has been underestimated, which undermines the reliability of the overall assessment.

Another critical gap is the lack of evaluation of the interconnectedness between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their surroundings, with visual and spatial relationships tied to the Atlantic horizon. Treating these sites as isolated entities fails to acknowledge their interdependence, leading to an incomplete assessment 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 their connection to the natural horizon. This signifies not just a visual impact, but also a broader cultural and spatial detriment that has not been sufficiently examined within the application.

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

The detrimental impacts identified cannot be adequately mitigated. The scale, height, and proximity of the turbines ensure their presence would be both dominant and unavoidable. Consequently, the change is fundamental and permanent, resistant to reduction through mitigation measures.

In conclusion, the assessment does not accurately represent the extent of the impact, the sensitivity of the environment, or the interconnectedness of the landscape and heritage. These inadequacies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries in the application is inadequate, failing to provide a thorough evaluation of the ecological and socio-economic impacts. The West Lewis coast is home to a vibrant marine ecosystem and an active fishing industry.

However, the proposal does not adequately demonstrate how these essential habitats and industries can be safeguarded from significant disruption.

A critical concern is the assumption that fishing activities can simply be relocated without negative consequences. The application lacks evidence supporting the availability, accessibility, and capacity of alternative fishing grounds to absorb any increased pressure. This absence of information is notable, as displacement could lead to overfishing in other areas and result in broader economic ramifications for the local fishing fleet. Without a solid and evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling for extended periods is likely to disturb marine life over significant distances, impacting species such as dolphins. The projected disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting evidence.

Inconsistencies within the application are evident, particularly in the acknowledgment of the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction diminishes the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially in cases where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts that may arise from multiple pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these collective 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 provide evidence that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal aligns with sustainable development principles.

Ultimately, the lack of evidence regarding the displacement of fishing activities, the underestimation of acoustic impacts, and internal contradictions render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a significant evidential gap. The West Lewis coastline is known for its exceptionally dark skies, which contribute to

environmental quality, cultural identity, and the tourism sector. The proposal introduces permanent red aviation lighting that will be visible over extensive distances, leading to a continuous and intrusive “wall of light” effect across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the area’s identity and the emerging sectors of astro-tourism. The omission of these impacts leads to a critical gap in the overall landscape and environmental assessment.

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

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

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

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

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

TOURISM

The analysis of tourism impacts is inadequate and does not assess the economic and social effects on a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area’s wild coastline, nearly untouched landscape, dark skies, and sense of

seclusion. While the application states that 86% of visitors are attracted by scenery, it lacks a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, providing support for more than 1,000 jobs and making up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience. Without this analysis, it is impossible to ascertain whether the development would yield a net economic benefit or adversely affect an established and expanding sector.

Furthermore, the assessment neglects the significance of environmental quality in bolstering tourism, including the value of unspoiled landscapes and dark skies for visitor experience, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment worsens this shortcoming, creating a considerable gap in understanding the effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the oversight regarding tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been analysed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show net benefit. It also contradicts strategic objectives that highlight tourism as a key growth sector, and it does not furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, evaluating environmental factors influencing visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This hampers a thorough assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as required by statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This current application, despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, has not adequately addressed those concerns.

A significant lack of reliable evidential basis exists for the application. Critical gaps in baseline data are evident, and the continued use of an undefined design envelope raises questions. Moreover, it relies on unspecified mitigation measures and omits key impact pathways such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism. This leads to an incomplete Environmental Impact Assessment, which does not facilitate a comprehensive understanding of the likely significant effects or residual impacts.

The application also exhibits clear procedural shortcomings. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment is a material omission. These issues impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

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

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

The proposal would result in 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 are permanent effects that cannot be mitigated to an acceptable level.

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

In light of these issues, a formal request is made that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

We live in the most beautiful part of the world. Our land is our own. Our beaches are unspoiled. Our wildlife is abundant. Our landscapes are idyllic. We can walk along our

coast and feel at one with nature and we can swim in the ocean; this brings a tremendous sense of wellbeing in a world that is just too busy! The proposed sea turbines along the west coast of Lewis are an abomination! They are TOO BIG and there are TOO MANY!!

The damage to the seascape and marine life will be tremendous; the damage to the landscape and wildlife due to the accompanying onshore support networks will be detrimental and our own health & wellbeing will suffer as a result of both. There will only be a small percentage of the island that will not see the turbines from where they stand. There is no-one in our communities that will not be affected.

Renewable energy is supposed to help us to save our planet but that cannot be done by destroying the most beautiful parts of our planet in order in the process; it just doesn't make sense!

There are so many reasons why this proposal is wrong.

Seabirds, Marine life and wildlife will die!

Dark skies will be gone!

Our way of life will be compromised!

Our health & wellbeing will suffer!

Tourism will be negatively affected; after decades of trying to promote our island, who will want to visit?

Please reconsider!

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: 3ED7FD04

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. My concerns stem from a thorough review of the Environmental Impact Assessment Report and its supporting documentation, revealing significant deficiencies across planning, environmental, cultural, and procedural domains. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, nearly untouched environment, and rich cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious doubts regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, baseline information is both limited and inconsistent, and numerous aspects of the proposal remain undefined. The reliance on a flexible design framework obscures a clear understanding of likely significant effects, while the unspecified mitigation measures make it impossible to assess their potential effectiveness. Consequently, the provided documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by robust evidence.

Moreover, there are evident and serious policy conflicts. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts directly impact the statutory tests necessary for consent and compromise the competent authority's ability to affirm that the development is acceptable in policy terms.

The scale of this proposal is unprecedented in this specific location, with large turbines positioned in close proximity to the shoreline, leading to substantial concerns about landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, the reliance on undefined mitigation measures, the evidential weaknesses, and the clear policy non-compliance illustrate that the application is incomplete and incapable of securing a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application fails to provide a reliable and comprehensive Environmental Impact Assessment Report, which is crucial for understanding the potential environmental effects of the proposal. There is an alarming lack of commitment to specific turbine dimensions, layouts, or configurations, as it employs a flexible Project Design Envelope. This approach introduces significant uncertainty and hinders the application of a worst-case scenario, which compromises the integrity of the assessment. As a result, the impacts outlined may not correspond to the actual development constructed, leaving both the public and the competent authority uninformed about the true extent of environmental repercussions.

Moreover, the application leans heavily on mitigation measures, management plans, and monitoring strategies that remain undefined. Seeking consent based on the premise that environmental harm will be addressed later is procedurally unacceptable. This practice obstructs a meaningful evaluation of effectiveness and fails to assess residual impacts, contradicting the purpose of the Environmental Impact Assessment regime that mandates the clear establishment of likely significant effects and mitigations prior to any determination.

There are also substantial evidential deficiencies present, such as inadequate baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. Consequently, there is uncertainty about the scale and significance of impacts, particularly where negligible or non-significant effects are reported without solid supporting data. The lack of sufficient information obscures a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

The deficiencies in the application impede its ability to meet the evidential threshold mandated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This raises concerns under the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it has not proven that impacts have been thoroughly assessed or that adequate safeguards exist.

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

ASSESSMENT OF ALTERNATIVES

The proposed development lacks a thorough assessment of alternatives, failing to comply with the requirements of the Environmental Impact Assessment regime. Instead of a structured evaluation of realistic options based on their environmental

impacts, the application presents a narrative about the evolution of the project. This approach does not adequately show that less harmful alternatives have been identified, assessed, and preferred over more damaging solutions.

Furthermore, there is no clear, evidence-based comparison of alternative locations, scales of development, or design configurations. The application does not illustrate that the developer has genuinely considered placing turbines further offshore, which would likely reduce 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 the conclusion that the proposed location is the least damaging.

These inadequacies extend to the assessment of cable routing and landfall, where there is little evidence that alternative routes have been properly examined to avoid or minimise impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to present a clear avoidance strategy, along with the absence of comparative analysis, suggests that mitigation through design has not been applied, resulting in reliance on post-design mitigation measures.

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

From a policy standpoint, this deficiency undermines alignment with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not undergone adequate evaluation and therefore cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the application is critically flawed and fails to deliver a thorough understanding of ecological receptors in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the existing baseline data is inadequate, and the methodologies employed do not effectively capture species presence, behaviour, or habitat use. Consequently, the assessment lacks a reliable evidential basis necessary for evaluating potential impacts.

One major gap is the consideration of otters, which are a European Protected Species. The application does not adequately acknowledge or assess their active foraging and movement within coastal regions. By overlooking their core foraging range and

behavioural patterns, the assessment neglects to evaluate the potential effects of construction-related disturbances, noise, and increased human activity. This deficiency undermines any conclusions drawn regarding the absence of significant effects on otters.

Moreover, the assessment's evaluation of basking sharks is similarly deficient, relying on aerial surveys that introduce considerable detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared with established land-based observations that indicate regular use of these waters. The failure to incorporate or adequately consider such critical data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in assessments of negligible or non-significant effects that are based more on assumptions than on robust evidence. The lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty about the actual risks to marine species and 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 not properly identified or assessed the relevant protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment fundamentally unreliable. These serious deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the assertion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the application is materially flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its conclusions. Despite the location of the development within key foraging areas and migratory pathways, the application fails to adequately demonstrate that these species will not be adversely affected. The assessment does not robustly evaluate critical issues such as displacement, collision risk, or habitat loss.

A key contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its

conclusions lack sufficient support from the underlying evidence. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

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

From a regulatory standpoint, the application does not meet the evidential threshold needed to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering the ability to reach a lawful conclusion in favour of consent.

Moreover, the deficiencies noted reflect a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable, due to internal inconsistencies, methodological weaknesses, and insufficient evidence. Such shortcomings hinder a robust evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is recognised as a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity fails to acknowledge this relationship and adopts a reductive view, treating heritage merely as isolated, static assets. This approach neglects their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are active places of burial and spiritual practice. The assessment, however, erroneously categorises them as static features, overlooking their continued use and the development's impact on their surroundings. This mischaracterisation results in an incomplete evaluation of the cultural effects and disregards the sites' importance to community life.

Moreover, the assessment does not consider intangible cultural heritage, including the Gaelic language and traditions, which are integral to the area's identity. The failure to include these elements represents a substantial omission that impedes a proper understanding of the cultural impact of the development.

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

Additionally, the absence of a compliant Island Communities Impact Assessment contravenes the statutory requirement set out in the Islands (Scotland) Act 2018. Without this crucial assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, which prevents a lawful determination.

These shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, as well as the living cultural practices of the community, constitutes a clear deviation from policy requirements.

Ultimately, the collective failures to assess living heritage, intangible cultural value, community rights, and statutory obligations result in a significant evidential gap. The application does not adequately address the cultural impacts of the development, providing an insufficient basis for evaluating the true 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 West Lewis coastline has an open Atlantic horizon and an undeveloped character that contributes to a strong sense of remoteness. The proposal for large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally changing this character and leading to a permanent alteration of the landscape.

The application fails to represent the magnitude of the visual changes that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, thereby impacting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact on such a sensitive landscape.

Methodological issues are present in the selection and representation of visual viewpoints. Evidence suggests that the chosen viewpoints may not accurately reflect

the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises concerns that the true magnitude of visual impact may have been understated, which calls into question the reliability of the assessment.

There is also a failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This results in not just a visual impact, but a more extensive cultural and spatial harm that has not been properly assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change is not compatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further weakens any claims of compliance with policy requirements.

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. Consequently, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

Overall, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal fails to provide a comprehensive assessment of construction and pollution risks, making it impossible to evaluate the likely environmental effects accurately. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined mitigation and contingency measures that would be prepared after consent, which undermines any meaningful assessment of their adequacy or effectiveness.

This lack of clarity is particularly alarming given the sensitive nature of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. While the application acknowledges potential risks such as sediment mobilisation and the

possibility of chemical or oil spills, it does not adequately detail how these incidents will be prevented, controlled, or monitored.

Moreover, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from the seabed disturbance and cable installation. Without robust modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also affects the potential consequences for marine species and habitats already recognised as sensitive in the broader assessment.

The absence of detailed emergency response procedures only exacerbates these issues. By delaying contingency planning until after consent, the application obstructs a proper evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures before making a decision.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and without such information, a lawful determination is unattainable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts makes the assessment materially deficient. These deficiencies preclude a thorough evaluation of construction and pollution risks and further emphasise that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents substantial risks to marine species, particularly due to underwater noise generated during construction activities. The prolonged use of high-energy hammer piling is expected to disturb species, such as dolphins, across large distances. Concerns regarding the predicted disturbance to a significant portion of the local bottlenose dolphin population are serious; however, the application downplays the significance of these effects, lacking sufficient supporting evidence.

Furthermore, the assessment of fisheries and marine life is inadequate, failing to provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast support both a diverse marine ecosystem and an active fishing industry. Nevertheless, the application does not convincingly demonstrate that these vital uses and habitats can be preserved without significant disruption.

A critical issue is the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds exist, are accessible, or can accommodate additional pressure. This significant omission risks overfishing in other areas and may lead to broader economic ramifications for the local

fleet. Without a clear, evidence-based assessment, the impacts on fisheries and local livelihoods remain poorly understood.

There are notable inconsistencies within the application regarding the need for licences to permit harm to European Protected Species, which are acknowledged while impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises compliance concerns with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

Additionally, the assessment does not take into account cumulative impacts arising from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. 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 fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby precluding any conclusion that the proposal represents sustainable development.

In light of these deficiencies, including the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal contradictions, the assessment remains incomplete and unreliable. These shortcomings obstruct a robust evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project lacks completeness, particularly concerning the onshore infrastructure, which is critical to understanding the full range of impacts associated with this integrated project. The offshore turbines and onshore works are fundamentally interconnected, yet the current assessment treats them separately. This fragmented approach obscures the true scale of the environmental and socio-economic consequences.

The onshore components encompass the installation of cabling across protected moorland, the construction of a substation close to Stornoway, and necessary access infrastructure that traverses sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive area. The application fails to provide a comprehensive assessment of the impacts on these environments, leading to an incomplete understanding of the overall environmental footprint of the project.

Moreover, the exclusion or deferment of onshore impact assessments prevents a thorough evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all aspects of a project be considered collectively; however, the division between offshore and onshore elements results in an inadequate

understanding of the combined impacts on peatlands, habitats, and local communities.

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

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this concern or prove that the overall carbon balance remains favourable.

Furthermore, routing the infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not show that the necessary consents or processes have been initiated, calling into question the project's deliverability and legality.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap within the Environmental Impact Assessment. The exceptionally dark skies along the West Lewis coastline are integral to the area's environmental quality, cultural identity, and tourism value. The proposal includes the introduction of permanent red aviation lighting, which would be visible over considerable distances, thereby creating a continuous and intrusive "wall of light" across the western horizon that fundamentally alters the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly significant in light of the importance of dark skies to the identity of the area and the growth of tourism sectors such as astro-tourism. The failure to consider these impacts reflects a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is a critical lack of evaluation regarding the effects on nocturnal

wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the application does not adequately assess how aviation lighting might affect these species or contribute to increased mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or related risks. Kittiwakes, for example, may forage or migrate at night and are similarly vulnerable to disorientation caused by artificial lighting; however, this risk has not been addressed. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts of the proposal.

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

In terms of policy, this omission contravenes the National Planning Framework 4, particularly regarding the protection of natural places and the maintenance of environmental quality. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the night-time character is a fundamental aspect of the environment.

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

TOURISM

The evaluation of tourism impacts within the application is significantly lacking, with a failure to assess the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application indicates that 86% of visitors are attracted by the scenery, it does not provide any quantified assessment regarding how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this sector.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million currently, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not analyse how the industrialisation of the seascape and the degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. The lack of such

an assessment means it is impossible to ascertain whether the proposed development would yield a net economic benefit or threaten an established and expanding sector.

Moreover, the assessment neglects the crucial role that environmental quality plays in attracting tourists, particularly regarding the preservation of unspoiled landscapes and dark skies that enhance visitor experiences. This oversight is further exacerbated by the omission of a Dark Skies Assessment, resulting in a significant gap in understanding the implications for a recognised and burgeoning segment of the local economy, such as nature-based tourism and astro-tourism.

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

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4, particularly concerning economic impacts and the need to show a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic consequences of the proposal adequately.

Overall, the combined failure to quantify tourism impacts, assess the environmental drivers that influence visitor behaviour, and recognise the economic dependencies of the island culminates in a significant evidential gap. This deficiency 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 criteria for sustainable development as set out by statutory duties, national policy, and evidential standards. It brings to light the same core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a major concern. This new application is presented under an even stronger policy framework, which now emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for the proposal, marked by critical gaps in baseline data and the ongoing use of an undefined design envelope. The reliance on unspecified mitigation measures is concerning, as is the omission of key impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a thorough understanding of the likely significant effects or residual impacts of the development.

Procedurally, the application demonstrates clear shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to fully disclose the Social Impact Assessment represents a material omission. These issues hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage and fails to demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling further undermines claims of net economic benefit. The cumulative effects of both offshore and onshore elements have not been properly assessed, obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds the environmental risks associated with the proposal. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and hindering the ability to lawfully conclude that impacts are acceptable.

This proposal would lead to significant 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 detrimental effects on tourism are permanent impacts that cannot be adequately mitigated.

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

For these reasons, 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: 6220688B

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report exhibits significant shortcomings and fails to deliver a comprehensive, transparent, or dependable evaluation of the anticipated environmental impacts associated with the proposal. The incorporation of a flexible Project Design Envelope, lacking specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty inhibits the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be realised, hindering both public understanding and the competent authority's capacity to comprehend the true extent of environmental effects.

Additionally, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be articulated. The request for consent is predicated on the assumption that environmental harm will be mitigated at a later date, which undermines the ability to thoroughly evaluate the effectiveness of such measures or assess any residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly defined prior to any determination.

Moreover, there are notable deficiencies in the evidential basis, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly when conclusions of negligible or non-significant effects are reached without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

As a result, the application does not satisfy the evidential requirements set forth by the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially in regard to protected species and sensitive habitats. The proposal also falls short of demonstrating compliance with National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been fully evaluated or if appropriate safeguards have been established.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough 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, particularly in its assessment of alternatives. Instead of a thorough and reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative detailing the evolution of the project. This method does not convincingly demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Moreover, there is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application notably does not show that the developer has adequately considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impacts further highlight the absence of this analysis, which undermines any claims that the proposed siting is the least damaging option.

Additionally, the deficiencies extend to cable routing and landfall assessment, revealing insufficient evidence that alternative routes have been thoroughly explored to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation by design has not been effectively applied, leading to a reliance on post-design mitigation measures instead.

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

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a material omission, reinforcing the conclusion that the application has not been properly assessed and is incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with this application is significantly lacking, failing to offer a complete and trustworthy understanding of the ecological receptors within the West Lewis coastal area. This marine environment is both highly sensitive and biologically active, yet the baseline data presented is incomplete. The methodologies employed do not sufficiently capture the presence, behaviour, and habitat utilisation of various species, which compromises the ability to assess potential impacts reliably.

Particularly concerning is the omission regarding otters, classified as a European Protected Species. The application inadequately acknowledges their active use of the coastal regions for foraging and movement, neglecting to consider their core foraging range and behavioural patterns. Consequently, the potential impacts stemming from construction-related disturbances, noise, and increased human activity have not been thoroughly assessed, undermining claims of no significant effects on this species.

Moreover, the assessment of basking sharks suffers from deficiencies, as it relies heavily on aerial surveys, which introduce substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate they frequently utilise these waters. The oversight of relevant data leaves the baseline incomplete and further weakens the credibility of the conclusions drawn.

These methodological shortcomings mean that assertions of negligible or non-significant effects rest on unsubstantiated assumptions rather than sound evidence. Additionally, the lack of comprehensive baseline data hampers meaningful evaluations of cumulative and indirect impacts, failing to account for seasonal variations and broader ecosystem interactions. This situation results in uncertainty regarding the actual risks faced by marine species and habitats.

Regulatory obligations are also not met, as the application does not adequately identify or assess protected species, failing to satisfy the standards set by the Environmental Impact Assessment regime and National Planning Framework 4. The uncertainty created prevents the assurance of no adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, lawful consent cannot be granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally unreliable ornithological assessment, marked by significant gaps in evidence and contradictions that call its conclusions into question. It is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, where internationally important seabird populations, already in decline, reside. Despite this, the assessment fails to demonstrate convincingly that these species will not suffer adverse effects. The implications of displacement, collision risk, or habitat loss have not been adequately evaluated.

There is a crucial inconsistency within the application itself. While the developer concludes that there are no significant adverse effects, they simultaneously propose a Habitats Regulations derogation case, which only arises when significant harm is anticipated. This contradiction further undermines the reliability of the assessment and

indicates that the conclusions drawn lack support from the underlying evidence.

Moreover, the assessment does not adequately substantiate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been fully considered, and the reliance on modelling methodologies introduces substantial uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. It is likely that mortality rates are underestimated due to incomplete baseline data and an insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term effects of sustained mortality within this corridor are not adequately assessed, raising concerns for species with relatively small global populations.

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

Additionally, the identified deficiencies contravene 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 creates a direct conflict with national policy.

In summary, the assessment is rendered unreliable by internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These deficiencies hinder a robust evaluation of potential impacts and support the conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously lacking and does not acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are deeply intertwined. The application takes a narrow view, treating heritage as disconnected, unchanging assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is how culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas are handled. These sites serve as active burial places and spiritual locations, yet the assessment treats them as fixed features, overlooking their current use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to an incomplete assessment of cultural

effects and fails to acknowledge their importance in community life.

The assessment also neglects to consider intangible cultural heritage elements, such as the Gaelic language and local traditions, as well as the enduring connection between the community and the coastal environment. These aspects are crucial to the area's identity but are entirely omitted from the evaluation, representing a major gap. Without addressing these factors, the true cultural impact of the development cannot be adequately grasped.

There are additional concerns regarding community rights and involvement. The Gaelic-speaking population has a unique cultural identity, recognised as characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and does not adhere to established principles of involvement in decisions that affect cultural and environmental matters.

A significant procedural error is the failure to conduct a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the relevant authority is unable to meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This absence alone makes lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially regarding the protection of historic assets and places. The oversight of both tangible and intangible heritage, along with the failure to recognise living cultural practices, is a clear deviation from policy expectations.

In summary, the neglect of living heritage, intangible cultural values, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the development have not been properly assessed, and the application fails to provide an adequate foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment, commissioned by the developer, has not been published, resulting in a significant evidential gap. This omission hampers both public understanding and the competent authority's ability to grasp the extent of social risks identified by the developer's own research. Available summaries suggest that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with residents and are not speculative in nature. However, the lack of a complete assessment hinders proper scrutiny of these findings and limits the ability to evaluate their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with findings from the developer highlighting

concerns over "cultural loss." Despite this recognition, these social impacts have not been adequately integrated into the main application nor given the weight they warrant. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the entire Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning are at risk. By not providing the comprehensive dataset, the application fails to present a complete evidential basis to assess the balance between benefits and harms.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the evidence currently available indicates existing adverse effects that have not been fully disclosed. Without the full assessment, it is impossible to demonstrate compliance with this policy.

The procedural implications of this non-disclosure are profound. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This constitutes a material omission within the application and represents a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and confirms that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts associated with the proposed turbines is significantly inadequate, failing to accurately capture the scale of change and the sensitivity of the West Lewis coastline. This area is characterised by its unspoilt Atlantic horizon, natural landscape, and a profound sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a pervasive industrial presence that would fundamentally change this character, leading to an irreversible transformation of the landscape.

The application does not effectively represent the extent of the visual changes anticipated. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts in the context of such a sensitive landscape.

Moreover, there are serious methodological issues concerning the selection and

presentation of visual viewpoints. It appears that the chosen viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of visual impact has been understated, thereby compromising the assessment's reliability.

Another critical oversight is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, disregarding their interdependence, which results in a partial evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these important relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This not only represents a visual issue but also inflicts broader cultural and spatial damage, which has not been sufficiently evaluated in the application.

From a policy standpoint, this proposal contravenes the National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The extent of the proposed changes is inconsistent with the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further diminishes any claims 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 overwhelmingly dominant and unavoidable. The anticipated change is thus fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and strongly indicate that the proposal is incompatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works in a high-energy Atlantic environment, yet the assessment of construction and pollution risks is incomplete. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on mitigation and contingency measures that would be prepared after consent, which prevents any meaningful evaluation of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future

measures is particularly concerning. The West Lewis coastline supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on prevention, control, or monitoring measures.

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

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

From a regulatory standpoint, the deferral of essential environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed before consent, and the lack of such information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of the impacts on fisheries and marine life, failing to provide a reliable evaluation of both ecological and socio-economic effects. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats can be preserved or maintained without considerable disruption.

A major concern is the unwarranted assumption that fishing activities can be displaced without any repercussions. The proposal offers no proof that alternative fishing grounds are not only available but also accessible and capable of sustaining any additional pressure. This significant oversight poses a risk of overfishing in other areas and could result in broader economic repercussions for the local fishing fleet. The lack of a clear, evidence-based assessment means the potential impacts on fisheries and livelihoods

remain unclear.

Moreover, the proposal introduces significant risks to marine species, particularly due to the underwater noise created during construction. The anticipated use of high-energy hammer piling over an extended period is likely to disrupt marine life across vast distances, affecting species such as dolphins. The potential disturbance to a considerable portion of the local bottlenose dolphin population raises substantial concerns; however, the application diminishes the importance of these effects without adequate supporting evidence.

There is a noticeable inconsistency in the application, acknowledging the need for licenses to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction casts doubt on the credibility of the assessment and raises questions regarding compliance with the Habitats Regulations, particularly when harm is expected to such a degree that it requires legal authorisation.

Additionally, the assessment does not address cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to 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 consequences for marine biodiversity, thus preventing any determination that the proposal constitutes sustainable development.

Overall, the combination of insufficient evidence regarding fishing displacement, a downplaying of acoustic impacts, and internal inconsistencies renders the assessment both incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore elements of this project include cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These works involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically sensitive habitat. The application fails to provide a comprehensive assessment of the impacts, which limits understanding of the project's overall environmental footprint.

The assessment of onshore infrastructure is materially incomplete. The offshore turbines and onshore works are intrinsically linked but are being assessed separately. This fragmented approach obscures the true scale of environmental and socio-economic effects. By excluding or deferring the assessment of onshore impacts, the

application obstructs a proper evaluation of cumulative effects. All components of a project should be considered together, yet the separation means that combined impacts on peatlands, habitats, and communities are not fully understood.

Significant risks to sensitive habitats, including machair systems and peatland environments, exist, and these habitats are subject to policy protection. The application does not demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented. This represents a clear evidential gap regarding biodiversity protection.

There are also concerns about carbon balance. Disturbing peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not adequately address this issue or prove that the overall carbon balance remains beneficial.

Moreover, routing infrastructure through active croft land could lead to conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, which raises doubts about deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would be visible over long distances, leading to a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally impacts the night-time environment. The assessment of dark skies and nocturnal wildlife is entirely absent, which represents a material omission within the Environmental Impact Assessment. The West Lewis coastline is characterised by exceptionally dark skies, which are crucial to the environmental quality, cultural identity, and tourism value of the area.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is particularly significant due to the vital role dark skies play in the area's identity and in emerging tourism sectors such as astro-tourism. Consequently, this oversight creates a clear gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife, including species

such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are highly sensitive to artificial lighting. Phototaxis, which can lead to disorientation and increased collision risk, has not been assessed. The application does not include a lighting impact assessment or a phototaxis study, thus failing to evaluate how the aviation lighting may affect these species or contribute to increased mortality.

Additionally, the ornithological assessment relies on daytime survey data, which does not account for nocturnal activity or associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this concern has not been assessed. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts.

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

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

In summary, the absence of any assessment of dark skies and nocturnal wildlife constitutes a significant evidential gap. The application is incomplete and cannot support a lawful determination due to the lack of baseline data, impact modelling, and species-specific analysis.

TOURISM

The assessment of the proposed development fails to adequately consider the impacts on tourism, a vital component of the Isle of Lewis economy. Tourism relies heavily on the area's natural assets, such as its wild coastline, unspoiled landscapes, dark skies, and overall sense of remoteness. Although the application indicates that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers or their behaviour, nor does it assess the potential effects on the overall economic contribution from tourism.

Tourism on the island has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, and now supports more than 1,000 jobs, representing up to 16% of the local economy. Nonetheless, the application lacks a thorough examination of how the industrialisation of the seascape and potential decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the island. Without this critical analysis, it remains unclear whether the proposed development would provide a net economic benefit or adversely affect this essential sector.

Moreover, the assessment neglects to acknowledge the significance of environmental quality for tourism, particularly how pristine landscapes and dark skies enhance the visitor experience and contribute to burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, creating a substantial gap in understanding the potential implications for this recognised and expanding segment of the local economy.

In an island community that faces challenges due to limited economic diversification, the failure to evaluate tourism impacts carries broader consequences for employment, local enterprises, and the sustainability of the community. The absence of a proper Island Communities Impact Assessment means that the economic vulnerabilities associated with tourism have not been appropriately addressed, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate a net benefit. It contradicts strategic objectives that designate tourism as a priority growth sector and lacks the necessary evidence for competent authorities to gauge the economic ramifications of the proposal.

Ultimately, the deficiencies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic reliance culminate in a significant evidential shortfall. This gap hampers the ability to carry out a comprehensive 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 exhibits significant deficiencies that undermine its alignment with the principles of sustainable development as mandated by statutory obligations and national policies. The issues identified in this application echo those from the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. This current proposal, however, is evaluated within a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A thorough examination reveals that the application lacks a reliable evidential foundation necessary for informed decision-making. There are notable gaps in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures, alongside the exclusion of critical impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment remains incomplete, inhibiting an adequate understanding of potential significant effects or residual impacts.

Procedurally, there are also marked failings. The omission of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018, while the failure to provide the complete Social Impact Assessment represents a

significant shortcoming. These oversights hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

Furthermore, the proposal stands in stark contradiction to National Planning Framework 4. It does not adequately demonstrate the safeguarding of biodiversity, natural environments, and cultural heritage, fails to justify acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to missing tourism impact analysis. The cumulative effects of both offshore and onshore components have not been sufficiently evaluated, obscuring the repercussions for peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially considerable. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are lacking and, at times, inconsistent. The required evidential standard to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and precluding a lawful assertion of acceptable impacts.

Moreover, the proposed development would cause significant and irreversible alterations to an extremely sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and adverse effects on tourism represent enduring changes that cannot be adequately mitigated.

Collectively, these factors render the application both procedurally and substantively unfit for determination. The extensive information deficiencies, in conjunction with conflicts with policy and unresolved environmental risks, obstruct the possibility of a lawful, evidence-based decision. Therefore, the competent authority must either reject the application on these grounds or invoke the appropriate regulatory measures to mandate the submission of the outstanding information.

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

Additional Comments

The turbines will not only aesthetically ruin the landscape but will have a negative affect on bird life, marine life, and also increase noise pollution.

The electric generated will not even benefit the local people and be part of a grid with no capacity

This needs to be stopped immediately to preserve the heritage of the Hebrides and the people that live there

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: A875754B

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies related to planning, environmental impacts, cultural heritage, and procedural integrity.

The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The scale and design of the project, particularly the placement of large turbines in close proximity to the shoreline, raise serious concerns about landscape capacity, visual impact, and overall environmental consequences.

Fundamental flaws are evident in the application, as it lacks an adequate evidential foundation necessary for a lawful determination. There is a noticeable absence of critical environmental data, with limited and inconsistent baseline information, while key elements of the project remain undefined. The flexible design framework utilised impedes a clear assessment of the likely significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a thorough understanding of potential environmental, cultural, and community impacts, rendering claims of negligible effects unsubstantiated by robust evidence.

Moreover, the proposal presents clear and substantial conflicts with established policies. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. These policy conflicts directly impact the statutory tests for consent and undermine the competent authority's capacity to deem the development acceptable from a policy standpoint.

In light of the unprecedented scale of this proposal in its specific location and the various evidential weaknesses present, it is clear that the application is incomplete and unable to support a lawful determination. Therefore, the precautionary principle must be applied in this context.

ASSESSMENT OF ALTERNATIVES

The application lacks a robust assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned comparison of viable alternatives based on their environmental effects, it presents a narrative account of how the project evolved. This approach does not adequately show that less harmful options have been properly identified, evaluated, and preferred over more damaging solutions.

There is a significant absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Notably, the proposal does not indicate that the developer has genuinely considered positioning the turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be lessened. Given the sensitivity of the West Lewis coastline and the critical role of proximity to the shore in assessing impact, the failure to include this analysis undermines any assertion that the proposed siting is the least damaging option.

The shortcomings are also evident in the cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy, along with insufficient comparative analysis, suggests that mitigation through design has not been effectively applied, leading to an over-reliance 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 reflects a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a thorough alternatives assessment, it is impossible to conclude that the proposal represents a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to offer a thorough and dependable understanding of the ecological receptors present in the West Lewis coastal environment. This region is a sensitive and biologically vibrant marine system, yet the methodologies used are insufficient to accurately capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a robust evidential basis for evaluating potential impacts.

A significant oversight pertains to otters, a European Protected Species, as the application does not adequately recognise or evaluate their active use of coastal areas for foraging and movement. The omission of critical information regarding their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects of construction disturbance, noise, and increased activity. This gap undermines any conclusions drawn about the absence of significant effects on this species.

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

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

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been appropriately identified or assessed. The level of uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby 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 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 has significant flaws in its ornithological assessment, which presents major gaps in evidence and inconsistencies that undermine its findings. The Isle of Lewis's west coast is home to internationally important seabird populations, many of which are already declining. However, the application fails to convincingly show that these species will not be negatively impacted. The development site is situated within critical foraging areas and migratory routes, yet the assessment does not thoroughly consider the risks of displacement, collision, or habitat loss.

There is a notable contradiction within the application. The developer claims that there are no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is typically necessary when significant harm is anticipated. This

inconsistency raises doubts about the assessment's reliability and suggests that its conclusions are not adequately backed by the evidence provided.

Furthermore, the assessment lacks sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The importance of these feeding grounds is not fully addressed, and the reliance on modelling introduces uncertainty, especially for species like Kittiwakes and Fulmars that are in serious decline. The methodologies used are likely to underestimate mortality, particularly given incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines in a recognised migratory corridor adds another serious risk, creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not properly evaluate the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

Regulatory compliance is also questionable, as the application does not meet the evidential standard required to assert that there will be no adverse effect on the integrity of protected sites. The contradictory conclusions, combined with data deficiencies and modelling constraints, indicate that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and inhibits a lawful decision in favour of consent.

Overall, the deficiencies identified reflect a failure to comply with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal at odds with national policy. These issues collectively render the assessment unreliable due to inconsistencies, methodological flaws, and insufficient evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment fundamentally undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when there is potential for disruption to community character and functioning. The developer's decision not to disclose the full dataset means that the application does not provide a complete evidential basis for evaluating the balance between benefits and harm.

Evidence suggests that residents are currently experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts, which are based on direct engagement with the community, are not speculative. Nonetheless, the failure to make the full assessment available prevents proper scrutiny of these findings and diminishes the ability to assess their significance within the decision-making framework.

Moreover, the proposal has been viewed as a direct threat to community identity and cohesion, with the developer's findings indicating a risk of "cultural loss." However, these implications have not been adequately incorporated into the primary application, nor have they been accorded the necessary weight. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the proposed development.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 concerning health and wellbeing. Developments are required to foster positive health outcomes and mitigate harm; however, the evidence at hand suggests existing negative effects that have not been fully revealed. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural consequences of this omission are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of access to the complete Social Impact Assessment. This represents a significant gap within the application and a failure to satisfy the evidential standards demanded by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, in conjunction with evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This ultimately hinders a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, fostering a strong sense of remoteness. The proposed large-scale turbines would be positioned near the shoreline, imposing a continuous and dominant industrial presence that would fundamentally alter this character, resulting in a permanent transformation of the landscape.

The application fails to accurately depict the magnitude of the visual change that would occur. The height and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the naturalness and remoteness that define this environment. This significant level of impact has not been adequately conveyed in the assessment.

There are also serious methodological issues concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or the worst-case scenarios, particularly regarding cultural heritage sites and valued landscapes. Such shortcomings risk understating the true magnitude of visual impact, which compromises the overall reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnected

relationship among landscape, seascape, and cultural heritage. Notable sites, including 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 heritage assets as isolated, neglecting their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The proposed scale of change is incompatible with the obligations to protect landscape character, visual amenity, and the settings of culturally significant sites. The failure to provide a thorough worst-case assessment further weakens any assertion of compliance with policy.

Moreover, it is evident that the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Thus, 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 does not accurately capture the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These critical deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails extensive seabed preparation and installation works 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 application presents a number of deficiencies regarding the assessment of fisheries and marine life, resulting in an incomplete and unreliable evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not sufficiently demonstrate that these vital uses and habitats can be protected or maintained without causing significant disruption.

A notable flaw lies in the assumption that fishing activity can be displaced without consequences. The application fails to provide any evidence indicating that alternative fishing grounds are available, accessible, or able to support the added pressure that displacement would create. This oversight is critical, as it raises concerns about potential overfishing in other areas and the possible economic ramifications for the local fishing fleet. Consequently, the impacts on fisheries and livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species due to underwater noise generated during construction activities. High-energy hammer piling, expected to occur over extended periods, is likely to cause disturbance across vast distances, particularly affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application

minimises the importance of these effects without adequate supporting evidence.

Moreover, there exists a contradiction within the application, where the requirement for licences to allow harm to European Protected Species is acknowledged, while simultaneously claiming that the impacts are negligible. This inconsistency undermines the credibility of the assessment and raises significant questions regarding compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

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

From a policy standpoint, the application does not establish compliance with the National Planning Framework 4 or the National Marine Plan. It lacks the necessary demonstration that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby obstructing any conclusion regarding the proposal's alignment with sustainable development.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies severely compromise the assessment. These shortcomings prevent a robust evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism value. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon and fundamentally altering the night-time environment. The application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the growing significance of dark skies to the local identity and emerging tourism sectors, such as astro-tourism.

Moreover, there is a critical absence of evaluation regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and increased risk of collision. The lack of a lighting impact assessment or phototaxis study means that there is no understanding of how the proposed aviation lighting could affect these species or increase mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. For

example, species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a critical gap in comprehending ecological impacts.

Without assessing the nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to demonstrate no adverse effects beyond reasonable scientific doubt cannot be met, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, the omission conflicts with the National Planning Framework 4, which pertains to the protection of natural places and the preservation of environmental quality. This oversight further undermines the overall assessment of landscape and seascape impacts, as the night-time character is an integral part of the environment.

In conclusion, the absence of any assessment related to dark skies and nocturnal wildlife represents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot support a lawful determination.

TOURISM

The analysis of tourism impacts within the application is fundamentally inadequate, failing to properly assess the economic and social ramifications for a crucial sector of the Isle of Lewis's economy. With tourism significantly relying on the area's wild coastline, near-pristine landscapes, dark skies, and unique sense of remoteness, it is notable that 86% of visitors are attracted primarily by scenery. Nevertheless, the application lacks a quantified assessment regarding how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

The tourism sector has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and comprising up to 16% of the island's economy. However, the application neglects to model the potential impacts of the seascape's industrialisation and the consequent loss of environmental quality on Tourism Gross Value Added and the wider economic resilience of the region. Such an analysis is crucial to ascertain whether the proposed development would yield a net economic benefit or instead jeopardise an established and thriving sector.

Furthermore, the assessment does not take into account the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this oversight, resulting in a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a context where the island community exhibits limited economic diversification, the lack of evaluation regarding tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. The omission 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 regarding economic impact and the necessity of demonstrating net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the overall inadequacy in quantifying tourism impacts, failing to assess the environmental factors influencing visitor behaviour, and disregarding the economic dependency of the island results in a significant evidential gap. This ultimately hinders a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the key issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this under an enhanced policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify the fundamental shortcomings.

There are notable deficiencies in the evidential basis required for determining the application. Critical gaps exist in baseline data, and there remains an undefined design envelope alongside unspecified reliance on mitigation measures. Furthermore, key impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism impacts, have been overlooked. Consequently, the Environmental Impact Assessment is insufficient, impeding a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the incomplete disclosure of the Social Impact Assessment represents a serious omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is in direct contradiction with National Planning Framework 4. It fails to

adequately protect biodiversity, natural environments, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent and do not satisfy the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, precluding a lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The vast array of information gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs the ability to make a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuses consent on these grounds or employs the relevant regulatory provisions to obtain the necessary missing information.

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

Additional Comments

I have recently moved back to the island, my house will have a view of the proposed turbines. I don't have a direct problem with this, I am concerned about wild life. I am concerned about the lack of giving back to the community. This changes our lives, so we should have a benefit from such a massive project. I am concerned about tourism, I am starting a small business and need high tourism to survive. I am concerned about the potential impact on individual and the community.

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: 7726AC1E

Member of the public 741

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the key issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this under an enhanced policy framework that emphasises biodiversity, peatland protection,

landscape integrity, and community wellbeing does not rectify the fundamental shortcomings.

There are notable deficiencies in the evidential basis required for determining the application. Critical gaps exist in baseline data, and there remains an undefined design envelope alongside unspecified reliance on mitigation measures. Furthermore, key impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism impacts, have been overlooked. Consequently, the Environmental Impact Assessment is insufficient, impeding a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the incomplete disclosure of the Social Impact Assessment represents a serious omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is in direct contradiction with National Planning Framework 4. It fails to adequately protect biodiversity, natural environments, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent and do not satisfy the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, precluding a lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The vast array of information gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs the ability to make a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuses consent on these grounds or employs the relevant regulatory provisions to obtain the necessary missing information.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is deeply concerning and poses significant risks to our community's health, wellbeing, and identity. While the developer engaged local residents through focus groups, the failure to publish the complete report creates a substantial evidential gap. This absence not only limits public understanding but also hampers the competent authority's ability to gauge the full spectrum of social risks identified in the developer's own research.

Residents are already feeling the weight of this proposal, experiencing measurable stress, anxiety, and concern due to its scale and proximity. These effects are grounded in direct engagement, thereby reinforcing their legitimacy. Yet, without access to the full assessment, the findings remain shrouded in ambiguity, obstructing proper scrutiny and the evaluation of their significance in the decision-making process.

Moreover, there is clear evidence that this proposal is perceived as a threat to community identity and cohesion, with concerns about "cultural loss" arising from the developer's findings. Unfortunately, these critical impacts have not been adequately integrated into the main application nor afforded the necessary weight in the evaluation process. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude. The decision-making process requires a complete evidential basis to assess the balance between the benefits and potential harms of the proposal.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet the evidence suggests existing adverse effects that have not been fully disclosed. Consequently, the absence of the full assessment makes it impossible to demonstrate compliance with this policy.

The implications of this omission are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment. This represents a material flaw in the application and signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Taken together, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, leaves the evaluation incomplete and unreliable. This ultimately undermines the lawful determination of the application, highlighting that it lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create a dominant industrial presence that fundamentally alters this character. This change would result in a permanent and irreversible transformation of the landscape.

The assessment of visual impacts is significantly lacking, failing to adequately capture the magnitude of visual change anticipated. The scale and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the qualities of naturalness and remoteness. This crucial aspect of the assessment is not sufficiently articulated, nor is its importance in the context of the sensitive landscape acknowledged.

Concerns also arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence indicates that these viewpoints may not adequately encompass the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the extent of visual impact has been understated, thus compromising the reliability of the overall assessment.

Another significant gap is the failure to examine the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, sharing visual and spatial relationships with the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The degree of change proposed is inconsistent with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

Moreover, the identified impacts cannot be effectively mitigated. The size, height, and proximity of the turbines would ensure their presence is dominant and inescapable. Consequently, the resulting change is not something that can be reduced to an acceptable level through mitigation efforts.

Collectively, these deficiencies in the assessment lead to an inaccurate representation of the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. Such shortcomings hinder a reliable evaluation and

reinforce the conclusion that the proposal is at odds with the protection of this landscape.

Personal Comments

These hideous windmills would I'm sure have to cover the entire country to satisfy our thirst for electricity, especially if everyone is also supposed to drive electric cars- for which there's not enough lithium in all the world, I gather. I believe that's the unmentioned price- a nightmare future filled with turbines. Please don't ruin the Hebrides on the way to this realisation. We all just need to live more simply & with less prodigious consumption of resources.

Yours faithfully,

[Redacted]

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant deficiencies in planning, environmental considerations, cultural factors, and procedural compliance. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely unspoilt environment, and rich cultural heritage. The proposal raises serious concerns about its alignment with statutory obligations, national policies, and the principles of sustainable development.

The application lacks a robust evidential foundation necessary for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and various critical aspects of the proposal remain undefined. The reliance on a flexible design framework obscures an understanding of potential significant effects, while the dependence on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed assessment of the environmental, cultural, or community implications, and the assertions of negligible or non-significant effects lack solid evidence.

There are evident and significant conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and community health and wellbeing. It does not prove that it meets national standards for protecting biodiversity, climate interests, and environmental integrity. These policy inconsistencies directly impact the statutory tests required for consent and jeopardise the ability of the relevant authority to deem the development acceptable according to policy guidelines.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises substantial concerns regarding landscape capacity, visual dominance, and environmental repercussions. The lack of adequate information, the reliance on undefined mitigation strategies, evidential weaknesses, and evident non-compliance with policy collectively indicate that the application is deficient and does not support a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies and fails to offer a complete, transparent, or reliable account of the expected environmental consequences of the proposal. The flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of precision hinders a consistent worst-case scenario application, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, which obstructs both the public's and the competent authority's understanding of the true environmental effects.

Moreover, the application relies extensively 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 addressed later prevents any meaningful evaluation of these measures' effectiveness or a proper assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's intent, which necessitates that significant likely effects and mitigation strategies are established prior to determination.

The report is also marked by significant evidential deficiencies, including gaps in baseline data and limitations in methodology, along with a reliance on assumptions instead of site-specific evidence. Such shortcomings create uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are concluded without strong supporting data. Insufficient information hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainties that are incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated 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 demonstrate compliance with National Planning Framework 4, especially concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies inhibit a lawful and robust assessment of environmental effects, meaning that the competent authority cannot determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

The application has not provided a structured and reasoned comparison of realistic alternatives based on environmental effects, which is a significant shortcoming. Instead, it presents a narrative account of project evolution that fails to show that less harmful options have been properly identified, assessed, and chosen over more

damaging solutions. There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has seriously considered placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in determining impact, and the absence of such analysis raises questions about whether the proposed siting is the least damaging option.

The deficiencies also extend to cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been adequately explored 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 the design has not been mitigated by proper planning, 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 failure to adhere to the established mitigation hierarchy obstructs the competent authority from determining whether less harmful and more appropriate alternatives are available. Without a thorough assessment of alternatives, it cannot be asserted that the proposal represents a sustainable or policy-compliant solution.

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 overarching conclusion that the application has not been sufficiently assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a significant deficiency in the assessment of marine ecology and protected species, failing to provide a thorough understanding of the ecological receptors in the West Lewis coastal environment. This area is not only biologically active but also highly sensitive, yet the baseline data remains incomplete. Furthermore, the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species, which undermines the reliability of the assessment's conclusions regarding potential impacts.

One critical area of concern is the treatment of otters, a species protected under European law. The application neglects to adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. This oversight means that the effects of construction disturbances, noise, and increased activity on their core foraging areas have not been properly assessed, leading to a misrepresentation of potential significant impacts on this species.

Similarly, the assessment of basking sharks is compromised by an overreliance on

aerial surveys, which introduces considerable detection bias, particularly in the challenging Atlantic conditions. This methodological choice is likely to result in an underestimation of their presence, especially when contrasted with the more reliable land-based observations that indicate these waters are frequently used by basking sharks. By failing to adequately incorporate or consider such vital data, the assessment falls short, resulting in an incomplete baseline.

These methodological flaws mean that any conclusions drawn about negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of robust baseline data impedes a meaningful assessment of cumulative and indirect impacts, including those related to seasonal changes and broader ecosystem interactions. This leaves considerable uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth in the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed the protected species in the area. The uncertainties raised prevent a definitive exclusion of adverse effects, necessitating the application of the precautionary principle. In light of these issues, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

underestimate mortality rates, especially when baseline data is incomplete and the behavioural responses of the species are not well understood.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is fundamentally insufficient, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community interweave. The application adopts a narrow perspective, viewing heritage as a collection of isolated, static assets, failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These active sites of burial and spiritual practice are mischaracterised as static features, with the assessment neglecting their continued use and meaning, as well as the impact that development could have on their setting. This inadequate representation leads to an incomplete understanding of cultural effects and disregards their role in community life.

Additionally, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language and traditions, as well as the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are completely omitted from the assessment, which represents a

significant lapse. Without the consideration of these factors, one cannot adequately grasp the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity with traits characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement questions the validity of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Another critical procedural failure is the omission of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to meet its legal duty to evaluate the social, cultural, and economic impacts on the island community. This alone hinders lawful determination.

From a policy standpoint, these inadequacies place the proposal in clear conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The oversight of both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a significant departure from policy requirements.

In summary, the failure to consider living heritage, intangible cultural values, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been properly assessed, and the application does not furnish a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not had its full report published. This lack of disclosure represents a significant evidential gap that impedes both the public and the competent authority from comprehending the complete range of social risks uncovered by the developer's own research. Without access to the full assessment, the ability to properly scrutinise the findings is severely limited, thereby obstructing the assessment of their significance in the decision-making process.

Residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by available summaries. These impacts are based on direct engagement with the community and are therefore not speculative. Furthermore, the proposal is seen as a direct threat to community identity and cohesion, with the developer's findings noting a "cultural loss." Despite the gravity of these issues, they have not been adequately incorporated into the main application or given the appropriate consideration they warrant.

The failure to publish the full Social Impact Assessment obscures the true human and

social costs of the development, undermining the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when the character and functioning of the community may be affected. By withholding the complete dataset, the application fails to provide a robust evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet existing adverse effects have not been fully disclosed in the available evidence. Consequently, without the complete assessment, adherence to this policy cannot be verified.

The procedural implications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission constitutes a material flaw within the application and signifies a failure to meet the evidential standards required by the Environmental Impact Assessment framework. Overall, the combination of not disclosing the full Social Impact Assessment and the evidence of existing adverse impacts renders the evaluation incomplete and unreliable, hindering a lawful determination and reinforcing the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts is fundamentally flawed, failing to accurately depict the extent of change and the sensitivity of the environment. The character of the West Lewis coastline is marked by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines situated near the shoreline would introduce a continuous industrial presence that would fundamentally alter this character and result in a permanent transformation of the landscape.

Furthermore, the application inadequately addresses the magnitude of the visual change. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately capture this level of impact or its significance within such a sensitive landscape.

Concerns arise regarding the selection and representation of visual viewpoints within the assessment. There is evidence that the viewpoints chosen may not sufficiently reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, compromising the reliability of the assessment.

Additionally, there is a failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape setting, linked visually and spatially to the Atlantic horizon. The assessment considers these sites in isolation, neglecting their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This issue transcends mere visual impact, representing a broader cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly contravenes National Planning Framework 4 concerning the protection of natural environments and historic assets. The scale of transformation proposed is incompatible with the mandate to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, 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. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate and lacks the necessary detail to evaluate potential environmental effects. The project entails significant seabed preparation and installation activities in a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. The application relies on mitigation and contingency measures that are to be formulated after consent has been granted, which hinders any meaningful assessment of their potential effectiveness.

This dependence on unspecified future measures raises particular concerns due to the sensitivity of the local environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to 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 resulting from seabed disturbance and cable installation. In the absence of thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty affects potential impacts on marine species and habitats that have already been identified as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This creates procedural risks and compromises the competent authority's capacity to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before consent is granted, and if this information is lacking, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of specified mitigation measures, detailed management plans, and uncertainty regarding possible impacts make the assessment materially deficient. These deficiencies obstruct a thorough evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a serious shortfall in assessing the impacts on fisheries and marine life, resulting in an incomplete understanding of the ecological and socio-economic consequences. The coastal waters off West Lewis are home to a vibrant marine ecosystem and an active fishing industry. However, the proposal fails to provide assurance that these essential uses and habitats will be protected from significant disruption.

One critical concern is the flawed assumption that fishing activities can simply be displaced without negative repercussions. The application does not offer any evidence regarding the availability or accessibility of alternative fishing grounds capable of accommodating increased pressure. This lack of information is crucial, as displacing fishing efforts could lead to overfishing in other areas, ultimately affecting the local fleet's economic viability. Without a thorough, evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Additionally, the proposal poses considerable risks to marine species, especially due to the underwater noise generated by construction activities. Prolonged hammer piling is anticipated to disturb marine life over extensive distances, impacting species such as dolphins. The projected disturbance to a significant segment of the local bottlenose

dolphin population raises alarming issues, yet the application minimises these effects without adequate supporting evidence.

There exists a notable inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species, while simultaneously claiming that impacts are negligible. This contradiction diminishes the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly when harm is expected to an extent that requires legal authorisation.

Furthermore, the assessment neglects to consider the cumulative impacts from various pressures, including 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 adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, hindering any assertion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents an incomplete assessment of the onshore infrastructure, overlooking the comprehensive impacts that arise from this interconnected project. The offshore turbines and onshore works are inherently related, yet they have been evaluated separately, leading to a disjointed approach that obscures the true extent of environmental and socio-economic implications.

Significantly, the onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, recognised as a crucial carbon store and ecologically sensitive habitat. The application fails to deliver a thorough evaluation of these impacts, which hampers a full understanding of the project's overall environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application inhibits a proper appraisal of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be reviewed collectively; however, the division between offshore and onshore elements means that the combined impacts on

peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been put in place, resulting in a significant evidential gap concerning biodiversity protection.

The proposal also raises critical concerns regarding carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this matter or shows that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land may lead to conflicts with current land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, casting doubt on the feasibility and lawful execution of the project.

From a policy standpoint, the failure to consider the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests runs counter to the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further detracts from the application's validity.

In summary, the fragmented assessment of project components, the absence of a comprehensive evaluation, and the lack of evidence concerning environmental and land use impacts render this section 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, which constitutes a material omission. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to environmental quality, cultural identity, and tourism value. The proposed development includes the installation of permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment.

Additionally, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly significant given the importance of dark skies to the area's identity and the burgeoning astro-tourism sector. The failure to consider these impacts creates a notable gap in the overall landscape and environmental assessment.

More alarmingly, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be

highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application lacks any form of lighting impact assessment or phototaxis study, failing to explore how aviation lighting could affect these species or contribute to increased mortality.

This omission is further exacerbated by an overreliance on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or related risks. For instance, Kittiwakes, which may forage or migrate at night, are susceptible to disorientation from artificial lighting, yet this risk has been ignored. The absence of site-specific night-time data presents a significant gap in the understanding of ecological impacts.

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

From a policy perspective, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, it diminishes the broader evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment.

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

TOURISM

The assessment of the economic impacts on tourism is significantly inadequate, neglecting to analyse the repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, their behaviours, or the overall economic contributions they make.

Tourism has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not address how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such evaluation, it is impossible to ascertain whether the proposed development would provide a net economic advantage or jeopardise an established and expanding sector.

Moreover, the assessment overlooks the crucial role of environmental quality in

fostering tourism, notably the significance of unspoiled landscapes and dark skies to visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a considerable void in understanding the impacts on a recognised and expanding facet of the local economy.

In a context where the island community has limited economic diversification, the neglect to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a valid Island Communities Impact Assessment means that these economic vulnerabilities have not been examined as required by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to prove net benefit. It also contradicts strategic objectives that designate tourism as a key growth sector and fails to provide adequate evidence for the competent authority to assess the economic ramifications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, examining environmental factors influencing visitor behaviour, and recognising the island's economic dependencies lead to a considerable evidential gap. This undermines a thorough evaluation of the economic effects and supports the conclusion that the application is fundamentally incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates a significant failure to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application reiterates the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

There are substantial gaps in the evidential basis needed for a thorough determination. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of essential impact pathways—including nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences—raise serious concerns. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a complete understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment constitutes a significant omission. These deficiencies hinder the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, thereby

rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy inconsistencies, and unresolved environmental risks obstructs the possibility of a lawful and evidence-based decision. The competent authority should either reject the application on these grounds or employ the appropriate regulatory mechanisms to demand the submission of the missing information.

In light of these concerns, I respectfully request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

1st of all Scotland has been scared with all the wind turbines that the rich get richer getting paid to turn them off

Scotland doesn't even receive any cheaper Electricity bills or any rewards for all this they are still shipping our wind generation power down South to England what do the Sovereign Scottish population get for all of the destruction of our beautiful country & for what 35 and the landscape will never be the same, who is going to deal with all the waste when these fail, burn diesel, blades shipped from China on ships that burn fuel how can this be classified as green this is a joke also the peat land clean our air by reducing carbon more than all the Forrest's together, yet they are widening the road destroying peat land, total destruction of our Islands, President Trump is they only leader calling out the British gov

What they are doing to Scotland with Wind turbines. The Scottish Government Should

be telling Westminster no way are you polluting our Scotland we need Independence to stop all this nonsense immediately.

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: 1A66C7BC

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation has identified significant deficiencies in planning, environmental, cultural, and procedural aspects of the proposal. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the proposed development raise serious concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal are not clearly defined. The employment of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the provided documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects are unsupported by robust evidence.

There are substantial conflicts with existing policies. The proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and hinder the competent authority's ability to determine whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposed development in this area raises considerable concerns, particularly regarding landscape capacity, visual dominance, and environmental impact, due to the large turbines being positioned close to the shoreline. In light of the insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks 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 application does not provide a structured, evidence-based assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of realistic alternatives based on environmental effects, it merely recounts the evolution of the project. This

narrative approach does not demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

The lack of transparent comparison extends to offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has adequately considered placing turbines further offshore, where impacts on visual, ecological, and coastal factors would likely be lessened. The significance of the West Lewis coastline and the critical role of proximity to the shore in assessing impact make this omission particularly concerning. Without such analysis, it is impossible to conclude that the proposed siting is the least damaging option available.

Moreover, the evaluation of cable routing and landfall is similarly flawed, with insufficient 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 failure to establish a clear avoidance strategy and to conduct a comparative analysis indicates a lack of application of mitigation by design, leading instead to reliance on post-design measures.

Consequently, the application does not show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether more suitable, less harmful alternatives are available. The absence of a robust assessment of alternatives raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, these deficiencies compromise adherence to the National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a significant omission, reinforcing the conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The ecological assessment provided lacks the necessary completeness and reliability to understand the ecological receptors in the West Lewis coastal environment. This region is a biologically active marine system, yet the methodologies used have not sufficiently captured the presence, behaviour, and habitat use of marine species. Consequently, the assessment fails to deliver an evidential basis for evaluating potential impacts.

Significant shortcomings are evident in the treatment of otters, a European Protected Species. The assessment does not adequately acknowledge their use of coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the potential impacts from construction activities, noise, and increased human presence are not thoroughly evaluated. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Similar deficiencies are noted in the assessment of basking sharks. The reliance on aerial surveys leads to a substantial detection bias, particularly given the conditions in the Atlantic. This methodology likely underrepresents their presence, especially when contrasted with land-based observations that indicate these waters are used frequently by the species. The failure to integrate or appropriately consider such information contributes to an incomplete baseline and diminishes the credibility of the findings.

These methodological weaknesses result in conclusions about negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not conform to the requirements established under the Environmental Impact Assessment regime and the National Planning Framework 4, as the necessary identification and assessment of protected species have not been conducted appropriately. The uncertainty generated prohibits the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species and highlight the overall lack of a sufficient evidential foundation for the application.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents several deficiencies that significantly undermine its conclusions. The assessment fails to convincingly demonstrate that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are in decline, will not be adversely affected by the proposed development. This area includes key foraging zones and migratory pathways, yet the implications of potential displacement, collision risk, and habitat loss are not adequately evaluated.

There is a fundamental contradiction in the application, where the developer claims no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment, suggesting that the conclusions drawn are not backed by sound evidence. Furthermore, the assessment does not provide adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It fails to account for the critical importance of these feeding grounds, and the use of modelling techniques introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies applied may underestimate mortality rates, particularly where baseline

data is lacking and behavioural responses are not fully understood.

The siting of turbines within a known migratory corridor introduces a significant risk, effectively acting as a barrier in a primary flight path used by birds travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality in this corridor or the potential impacts on species with small global populations.

Regulatory standards are not met, as the application fails to provide the necessary evidence 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 and prevents a lawful conclusion that would support consent.

Collectively, these deficiencies signify a lack of compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be negatively impacted puts the proposal at odds with national policy. Overall, the assessment is unreliable due to internal inconsistencies, methodological flaws, and insufficient evidence, which hinder a thorough evaluation of the impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly regarding the West Lewis coastline, which is a vibrant cultural landscape where environment, language, tradition, and community are interconnected. The application adopts a simplistic view, treating heritage as isolated, static features rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

There is a notable deficiency in the treatment of culturally significant sites, specifically the active burial grounds at Dalmore, Bragar, and Barvas. These places serve as essential locations for burial and spiritual practice, yet the assessment considers them as static elements, neglecting their ongoing use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural impacts and overlooks their vital role in community life.

Moreover, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language and local traditions, which are integral to the area's identity. This significant omission hampers the understanding of the cultural impact of the development. The lack of assessment of these vital cultural elements further diminishes the validity of the evaluation.

Concerns also arise regarding community rights and engagement, particularly for the

Gaelic-speaking population, which embodies a distinct cultural identity characteristic of an Indigenous People. The absence of a Free, Prior and Informed Consent process undermines the integrity of the assessment, failing to meet established principles of community participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community, rendering a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect to address both tangible and intangible heritage, along with a disregard for living cultural practices, signifies a clear deviation from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development lacks a comprehensive assessment of social impacts, health, and wellbeing, raising significant concerns regarding transparency and compliance with legal evaluation standards. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This absence of information creates a crucial evidential gap, hindering both public understanding and the competent authority's ability to evaluate the full extent of 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 proposed development. These reported impacts are based on direct engagement with the community and are therefore substantiated rather than speculative. However, the failure to disclose the full assessment prevents proper scrutiny of these findings and constrains 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 "cultural loss" noted in the developer's findings. Despite this acknowledgment, the application has not adequately integrated these impacts or assigned them appropriate weight. 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 undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may affect community character and functioning. Without access to the complete dataset, the application falls short of providing a full evidential basis for balancing potential benefits against 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 available evidence suggests existing adverse effects that remain undisclosed. Without the complete assessment, compliance with this policy is unproven.

The implications of this procedural deficiency are significant. The competent authority cannot perform a thorough socio-economic and health evaluation without the full Social Impact Assessment, representing a material omission within the application. This failure to meet evidential requirements of the Environmental Impact Assessment regime ultimately renders the assessment incomplete and unreliable. Consequently, a lawful determination cannot be made, reinforcing the conclusion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual, landscape, and seascape impacts presented in the application is significantly lacking and does not accurately reflect the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its unspoilt Atlantic horizon and a profound sense of remoteness. The placement of large-scale turbines near the shoreline would create a persistent and overwhelming industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape that cannot be undone.

Furthermore, the application fails to adequately demonstrate the magnitude of visual change that would result. The scale and close proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment does not convincingly convey the significance of this impact within the context of such a delicate landscape.

Methodological issues also arise concerning the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and landscapes of high value. This raises concerns about the potential understatement of visual impact, which compromises the overall reliability of the assessment.

Additionally, there is a notable failure to evaluate the interconnected relationship

between the landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked visually and spatially to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated, leading to an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the preservation of natural environments and historic assets. The scale of the proposed changes is incompatible with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of compliance with policy guidelines.

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

Collectively, these shortcomings in the assessment prevent an accurate representation of the impact scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. Such deficiencies hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is lacking in necessary detail for evaluating environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans for the substantial seabed preparation and installation works proposed in a high-energy Atlantic environment. Instead, the application relies on future mitigation and contingency measures that will be prepared after consent, which obstructs a meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns, especially considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on how these issues will be prevented, controlled, or monitored.

There is uncertainty surrounding the scale and behaviour of sediment plumes resulting

from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to potential effects on marine species and habitats that have already been identified as sensitive.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. Deferring contingency planning until after consent hampers the ability to evaluate whether adequate safeguards are in place to respond to pollution incidents. This creates procedural risk and diminishes the competence of the authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent; without this information, a lawful determination cannot be achieved. The application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts renders the assessment significantly deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application does not adequately assess the onshore infrastructure, resulting in a material incompleteness that obscures the true extent of impacts from this integrated project. The offshore turbines and the onshore works are intrinsically connected, yet they are evaluated separately. This fragmented approach fails to provide a full understanding of the environmental and socio-economic effects.

Included in the onshore elements are cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, an ecologically sensitive habitat and significant carbon store. The lack of a comprehensive assessment of these impacts hinders a clear understanding of the project's overall environmental footprint.

Excluding or deferring the assessment of onshore impacts obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together, but the division between offshore and onshore aspects means that the combined impacts on peatlands, habitats, and local communities are not fully comprehended.

Significant risks to sensitive habitats exist, including machair systems and peatland environments that are subject to policy protection. The application fails to demonstrate

that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been put in place, revealing a clear evidential gap concerning biodiversity protection.

Concerns regarding carbon balance also arise from the proposal. Disturbance of peatland leads to the release of stored carbon, potentially incurring a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

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

From a policy standpoint, the failure to evaluate the project as a cohesive whole and to demonstrate the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be 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 part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a crucial 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 for environmental quality, cultural identity, and tourism. The proposed project would introduce permanent red aviation lighting, visible from great distances, leading to a disruptive “wall of light” effect across the western horizon, fundamentally changing the night-time landscape.

Furthermore, the application fails to assess how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning considering the role that dark skies play in the region's identity and the potential for growth in tourism sectors such as astro-tourism. The lack of consideration for these impacts indicates a notable deficiency in the overall landscape and environmental assessment.

Additionally, the proposal does not evaluate the effects of artificial lighting on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting, which can lead to disorientation and increased risks of collision. The absence of any lighting impact assessment or phototaxis study means there is no analysis of how aviation lighting could affect these species or potentially raise mortality rates.

This issue is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and related risks. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, but this has not been evaluated. The lack of site-specific night-time data highlights a significant gap in understanding the ecological consequences.

In the absence of an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be negatively affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and hinders a lawful determination.

From a policy standpoint, the omission is in conflict with National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. This failure also compromises the broader evaluation of landscape and seascape impacts, as night-time character is a fundamental aspect of the environment.

Collectively, the lack of assessment concerning 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 insufficient for a lawful determination.

TOURISM

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

Tourism has seen significant growth, rising from £65 million in 2017 to over £81.5 million. It supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application neglects to model how the potential industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added and the broader economic resilience. Without such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or harm an established and expanding sector.

Additionally, the assessment does not address the importance of environmental quality for tourism. It fails to recognise how unspoiled landscapes and dark skies enhance visitor experience and support emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a

significant gap in understanding the impacts on a growing segment of the local economy.

In an island community that has limited economic diversification, the neglect to assess 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 properly evaluated, as required by the Islands (Scotland) Act 2018.

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

Overall, the lack of quantification regarding tourism impacts, the failure to assess environmental drivers of visitor behaviour, and the consideration of the island's economic dependency result in a substantial evidential gap. This gap hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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: FE46A63E

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough examination of the Environmental Impact Assessment Report and its accompanying documentation, which reveals numerous deficiencies in planning, environmental, cultural, and procedural aspects. This proposed development is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The design, scale, and proximity of the wind farm to the shoreline raise significant concerns regarding compliance with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks a sufficient evidential basis necessary for a lawful determination. There are significant gaps in critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key elements of the proposal remain undefined. The reliance on a flexible design framework obfuscates a clear understanding of the likely significant effects, while the unspecified mitigation measures prevent any assessment of their potential effectiveness. Consequently, the documentation fails to furnish a complete or informed understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by robust evidence.

Substantial conflicts with policy are evident. The proposal is not aligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly impact the statutory tests necessary for consent, undermining the competent authority's capacity to ascertain that the development adheres to policy standards.

The unprecedented scale of this proposal, with large turbines positioned in close proximity to the shoreline, brings forth serious concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, the dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings, resulting in an inadequate and opaque account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of precision hinders the ability to consistently apply a worst-case scenario and diminishes the reliability of the assessment. Consequently, the impacts outlined may not accurately represent the actual development, leaving both the public and the competent authority unable to fully comprehend the true extent of environmental effects.

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

Moreover, there are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such deficiencies introduce uncertainty about the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that fails to meet statutory requirements.

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

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and data gaps renders the Environmental Impact Assessment Report incomplete and unreliable. These deficiencies inhibit a lawful and thorough evaluation of environmental effects, preventing the competent authority from making an informed decision based on the available information.

MARINE ECOLOGY AND PROTECTED SPECIES

The 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 or reliable understanding of the ecological receptors present. The baseline data is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of the species in this area. Consequently, the assessment does not offer a sound evidential

basis for evaluating potential impacts.

A significant oversight in the application pertains to otters, which are a European Protected Species. The failure to properly recognise and assess their active use of coastal areas for foraging and movement is troubling. Without considering their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity have not been adequately evaluated. This lack of assessment undermines any conclusions regarding the absence of significant effects on otters.

Further shortcomings are evident in the assessment of basking sharks, where reliance on aerial surveys has led to significant detection bias, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when contrasted with established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such important data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

These methodological deficiencies mean that any conclusions regarding negligible or non-significant effects rely on assumptions rather than solid evidence. The inadequacy of baseline data also hinders meaningful assessment of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The level of uncertainty introduced prohibits the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The ornithological assessment associated with the development application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to adequately demonstrate that these seabird species will not be adversely affected, particularly in key foraging areas and migratory pathways, while the implications of displacement, collision risk, and habitat loss are not robustly evaluated.

A serious contradiction exists within the application, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. The assessment does not sufficiently establish that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. It fails to fully account for the importance of these feeding grounds, and the reliance on modelling approaches introduces uncertainty, especially for species such as Kittiwakes and Fulmars that are experiencing severe decline. The methodologies employed are likely to underestimate mortality, particularly when baseline data is lacking and behavioural responses are not completely understood.

The placement of turbines within a recognised migratory corridor poses a significant risk, potentially creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately assessed, nor are the potential effects on species with relatively small global populations considered. 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, coupled with data gaps and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and precludes 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 positions the proposal in direct conflict with national policy. Collectively, these issues render the assessment unreliable due to methodological weaknesses, internal inconsistencies, and inadequate evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking, particularly in its failure to recognise the West Lewis coastline as a dynamic cultural landscape where community, language, tradition, and environment are deeply intertwined. Rather than appreciating the ongoing social, cultural, and spiritual significance of heritage, the application adopts a reductive perspective, viewing it merely as a collection of isolated and static features.

A notable shortcoming in the assessment is the handling of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites function as

active burial grounds and centres of spiritual practice; however, the evaluation treats them as unchanging elements, neglecting their contemporary use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural impacts, failing to acknowledge the cemeteries' role within the life of the community.

Additionally, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language, traditions, and the longstanding relationship between the community and its coastal environment. These aspects are vital to the area's identity and are conspicuously absent from the assessment, representing a critical omission. Consequently, the true cultural ramifications of the development cannot be accurately assessed without addressing these factors.

Concerns also arise regarding community rights and participation. The Gaelic-speaking community, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to adhere to established principles regarding participation in decisions impacting cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018, represents a significant procedural lapse. Without this assessment, the competent authority cannot fulfil its statutory obligation to evaluate the social, cultural, and economic consequences for the island community, thereby hindering a lawful determination.

From a policy standpoint, these inadequacies place the proposed development at odds with National Planning Framework 4, particularly concerning the preservation of historic sites and assets. The failure to consider both tangible and intangible heritage, along with a disregard for living cultural practices, constitutes a clear deviation from policy directives.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and adherence to statutory requirements creates a substantial evidential gap. The cultural impacts of the proposed development remain inadequately evaluated, and the application does not furnish a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is fundamentally lacking, with insufficient transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the complete report has not been made public. This represents a considerable evidential gap that hinders both public understanding and the competent authority's ability to assess the full scope of social risks highlighted by the developer's own research.

Summaries available indicate that residents are currently facing significant stress, anxiety, and concern due to the proposal's scale and proximity. These consequences arise from direct community engagement and are thus grounded in reality rather than speculation. However, the absence of the full assessment restricts proper examination of these findings and limits the determination of their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal threatens community identity and cohesion, with "cultural loss" identified within the developer's own findings. Despite this, these social impacts have not been adequately included in the main application or given the necessary weight in considerations. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. It is critical to have a comprehensive understanding of social, economic, and health impacts for developments of this magnitude, especially when community character and functioning may be at risk. The failure to provide the full dataset means that the application does not present a complete evidential basis necessary for evaluating the balance between benefits and harms.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. Development must not only support positive health outcomes but also avoid causing harm; however, the available evidence points to existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be established.

The procedural implications are substantial, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This is a significant omission within the application and represents a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development of large-scale turbines near the West Lewis coastline raises significant concerns regarding its impact on seascape, landscape, and visual integrity. This area is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. Introducing such industrial structures in close proximity to the shoreline would establish a persistent industrial presence, fundamentally altering the unique character of the environment and leading to a

permanent transformation of the landscape.

The application fails to adequately capture the magnitude of the visual changes anticipated. The size and proximity of the turbines would overshadow views from nearby residential areas, historic sites, and popular coastal locations, negatively impacting visual amenity and diminishing the area's defining characteristics of naturalness and remoteness. The existing assessment does not effectively communicate the significance of these impacts within the context of this sensitive landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. There is evidence to suggest that the viewpoints chosen do not fully represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This suggests a potential understatement of the visual impact, which compromises the reliability of the assessment.

Moreover, the assessment does not adequately evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Important 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. The current assessment treats these heritage assets in isolation, failing to recognise their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, fundamentally changing how heritage assets are experienced and severing their connection to the natural horizon. This alteration represents not just a visual impact but also a wider cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of transformation proposed conflicts with the necessity to safeguard 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 relevant policies.

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. Consequently, the changes would be fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The current application presents an incomplete assessment of construction and pollution risks, failing to deliver the necessary detail to adequately evaluate the potential environmental impacts. It involves significant seabed preparation and installation activities in a high-energy Atlantic setting; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the proposal depends on mitigation and contingency measures that are to be formulated after consent is granted, thus hindering any substantive evaluation of their potential effectiveness or adequacy.

This reliance on unspecified future measures raises considerable concern, especially in light of the sensitive nature of the receiving environment. The coastline of West Lewis is home to clean coastal waters and crucial habitats that are susceptible to disturbance and contamination from sediment. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental spills involving chemicals or oil, it does not sufficiently outline the strategies to prevent, control, or monitor these occurrences.

Further uncertainty arises regarding the size and dynamics of sediment plumes that may result from the seabed disturbance and the installation of cables. The lack of robust modelling and explicitly defined management strategies renders it impossible to ascertain the potential extent, duration, or ecological consequences of these impacts. This uncertainty also extends to effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether suitable safeguards are in place for responding to pollution incidents. This deferral introduces procedural risks and diminishes the capability of the competent authority to appraise environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the stipulations set forth by the Environmental Impact Assessment regime. Significant effects and proposed mitigations should be assessed prior to consent, and without this critical information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements that pertain to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the assessment of fisheries and marine life, which lacks a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast, known for their diverse marine ecosystem and active fishing industry, face potential threats from the proposed development. The application fails to ensure that these habitats and livelihoods will be protected or maintained without considerable disruption.

One major issue is the underlying assumption that fishing activities can be displaced without any repercussions. The application does not provide evidence that alternative fishing grounds are available or can adequately accommodate the displaced activity. This gap is critical, as such displacement could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment makes it impossible to understand the true impacts on fisheries and local livelihoods.

Moreover, the proposal poses serious risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is expected to disturb marine life over extensive distances, notably affecting species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate evidence to support such minimisation.

There is an evident inconsistency in the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously declaring the impacts as negligible. This contradiction compromises the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly concerning anticipated harm that would necessitate legal authorisation.

Furthermore, the assessment neglects to account for cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is crucial to understanding the overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies culminate in an assessment that is incomplete and unreliable. These shortcomings obstruct a robust 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 vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to consider the impacts of the proposed permanent red aviation lighting. This lighting would create a persistent "wall of light" effect that could drastically change the night-time environment.

Furthermore, the application does not evaluate how this lighting would affect visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies for the area's identity and the rise of astro-tourism, this oversight is considerable. The absence of this assessment leaves a gap in understanding the landscape and environmental impacts.

Additionally, there is no analysis of the potential 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 their risk of collision. The application lacks a lighting impact assessment or a phototaxis study to determine how the aviation lighting may affect these species or contribute to increased mortality rates.

This issue is worsened by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, but this has not been assessed. The lack of site-specific night-time data represents a critical gap in understanding ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The application does not meet the evidential standard needed to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions violate the National Planning Framework 4 concerning the protection of natural spaces and environmental quality. Moreover, they undermine the overall assessment 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 creates 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 under consideration lacks a thorough assessment of the impacts on tourism, which is a vital sector for the Isle of Lewis economy. It is crucial to note that tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness. Although the application states that 86% of visitors

are attracted by scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure may influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Since 2017, tourism on the island has seen substantial growth, rising from £65 million to over £81.5 million, and it supports more than 1,000 jobs while accounting for as much as 16% of the island's economy. Nonetheless, the application does not model the potential effects of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. This lack of analysis makes it impossible to ascertain whether the proposed development would yield a net economic benefit or detract from a sector that is both established and expanding.

Furthermore, the assessment neglects to account for the critical role that environmental quality plays in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience. Emerging markets such as nature-based tourism and astro-tourism highlight the need for a comprehensive understanding of these factors. The absence of a Dark Skies Assessment exacerbates the shortcomings of the application, creating a considerable gap in understanding the potential impacts on this recognised and growing aspect of the local economy.

In an island community that has limited economic diversification, the lack of an assessment of tourism impacts raises broader concerns for employment, local enterprises, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

The combination of insufficient quantification of tourism impacts, inadequate consideration of the environmental factors driving visitor behaviour, and a disregard for the island's economic dependency results in a significant evidential gap. This omission undermines the ability to conduct a robust 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 fundamentally fails to meet the requirements for sustainable development, as it does not align with statutory duties, national policy, or evidential standards. This proposal mirrors the principal issues that led to the rejection of the Lewis Wind Power initiative in 2008, particularly concerning the unacceptable scale of industrialisation. Despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection,

landscape integrity, and community wellbeing, it remains deficient.

A reliable evidential basis for the determination of this application is lacking. Significant gaps exist in baseline data, and the continued use of an undefined design envelope raises concerns. The proposal relies on unspecified mitigation measures and neglects to address critical impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are also evident, notably the absence of a compliant Island Communities Impact Assessment, which constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the incomplete disclosure of the Social Impact Assessment is a material omission that hampers the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies make the application unfit for determination.

The proposal conflicts with National Planning Framework 4, as it does not adequately protect biodiversity, natural places, and 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. Furthermore, the cumulative impact of both offshore and onshore elements has not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent in some areas. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing any lawful conclusion regarding acceptable impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A073D08B

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns about the scale, proximity, and design of the development raise questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The documentation provided fails to supply a sufficient evidential foundation for a lawful assessment. There are significant gaps in critical environmental data, with baseline information being both limited and inconsistent. Additionally, important aspects of the proposal remain undefined. The flexible design framework utilised does not facilitate a clear understanding of potential significant effects, and reliance on unspecified mitigation measures means their effectiveness remains unassessed. Consequently, there is no comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

There are notable and serious conflicts with established policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and overall environmental integrity. These issues challenge the statutory tests required for consent and compromise the capacity of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of this proposal in the area, with substantial turbines situated near the shoreline, raises significant worries about landscape capacity, visual impact, and broader environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to provide a transparent and reliable account of the likely environmental effects of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific

dimensions, layouts, or configurations for turbines, creates significant uncertainty. This lack of commitment undermines the integrity of the assessment and means that the impacts presented may not accurately reflect the final development. As a result, both the public and the competent authority cannot fully understand the true extent of environmental effects.

The application depends heavily on mitigation measures, monitoring strategies, and management plans that have not been clearly defined. Seeking consent on the assumption that environmental harm will be managed later prevents any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This deferral of crucial information until after consent is granted is procedurally unacceptable and contradicts the goals of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation should be established prior to decision-making.

Moreover, there are serious gaps in evidence, including incomplete baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty about the scale and significance of the impacts, particularly where claims of negligible or non-significant effects lack robust supporting data. The insufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot meet statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to comply with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is not demonstrated that impacts have been fully assessed or that suitable safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data make the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment represents a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is significantly deficient. The methodologies applied do not provide a complete or reliable understanding of ecological receptors within this area, with baseline data being notably incomplete. This inadequacy hampers the assessment's ability to capture essential aspects of species presence, behaviour, and habitat use, leading to a lack of sound evidential basis for evaluating potential impacts.

A critical oversight in the application is the failure to adequately recognise and assess the active use of coastal areas by otters, which are classified as a European Protected Species. The assessment neglects to consider their core foraging range and behavioural patterns, meaning that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly evaluated. Consequently, the validity of conclusions regarding the absence of significant effects on this species is undermined.

Furthermore, there are notable deficiencies in the assessment of basking sharks due to the heavy reliance on aerial surveys, which introduce significant detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of these animals, especially when compared to established land-based observations indicating their frequent use of these waters. The failure to incorporate or adequately consider such pertinent data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions about negligible or non-significant effects being based on assumptions rather than substantial evidence. Additionally, the lack of sufficient baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This scenario creates uncertainty regarding the true 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 assessed. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it would not be lawful to grant consent.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. Such deficiencies preclude a rigorous evaluation of impacts on marine ecology and protected species, further substantiating the conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical contradiction lies within the application itself; the developer asserts that there

will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This incongruity raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment does not adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It neglects to fully account for the importance of these feeding grounds, and the reliance on modelling approaches introduces a degree of uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor adds another layer of significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term consequences of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application has significant shortcomings regarding the assessment of community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that aligns with characteristics of an Indigenous People. However, no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement undermines the assessment's legitimacy and disregards established principles of participation in decisions that affect cultural and environmental interests.

Moreover, the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, raises serious concerns. These sites are active places for burial and spiritual practice, yet they are inaccurately categorised as static features. This mischaracterisation fails to acknowledge their ongoing use and meaning, as well

as the potential impact of development on their setting. Consequently, this results in an inadequate evaluation of cultural effects and neglects their importance in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment represents a significant evidential gap that undermines the entire evaluation process for this development. While the developer engaged local residents through focus groups, the lack of transparency concerning the findings prevents both the public and the competent authority from fully understanding the social risks identified in the developer's own research. Existing summaries indicate that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and should not be dismissed as speculative; however, without access to the complete assessment, the findings cannot be properly scrutinised, limiting their significance in the decision-making process.

Furthermore, there is a perception among residents that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this critical insight, these 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, preventing a comprehensive understanding of its implications.

This lack of transparency also compromises the Environmental Impact Assessment process. An accurate assessment of social, economic, and health impacts is crucial for developments of this scale, especially when community character and functioning may be affected. Without the complete dataset, the application fails to provide a thorough evidential basis for evaluating the balance between benefits and harm. From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should support positive health outcomes and avoid harm; however, the available evidence suggests existing adverse effects that have not been fully disclosed. Consequently, compliance with this policy cannot be established in the absence of the full assessment.

The procedural implications of this situation are serious. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment, representing a material omission within the application. This failure to meet the evidential requirements of the Environmental Impact Assessment regime is concerning. Ultimately, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the evaluation incomplete and unreliable, hindering lawful determination and highlighting that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning visual, landscape, and seascape impacts is significantly inadequate and does not fully capture the extent of change or the sensitivity of the affected environment. The West Lewis coastline is characterised by an expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would result in a continuous and imposing industrial presence, drastically altering this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application fails to sufficiently convey the magnitude of this visual transformation. The size and closeness of the turbines would overpower views from residential areas, historic sites, and popular coastal locations. This situation would directly diminish visual amenity and compromise the defining qualities of naturalness and remoteness. The assessment does not adequately express the significance of these impacts within such a sensitive landscape context.

Concerns also arise from the methodology applied in selecting and presenting visual

viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, thus questioning the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated entities fails to acknowledge their interdependence, leading to an incomplete understanding of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the preservation of natural spaces and historic assets. The extent of change is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive 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 proximity of the turbines, their presence would be dominant and inescapable. Consequently, the change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

Overall, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the intertwined nature of landscape and heritage. These shortcomings impede a reliable evaluation and reinforce the conclusion that the proposal does not align with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The current application presents an incomplete assessment of construction and pollution risks, failing to deliver the necessary detail to adequately evaluate the potential environmental impacts. It involves significant seabed preparation and installation activities in a high-energy Atlantic setting; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the proposal depends on mitigation and contingency measures that are to be formulated after consent is granted, thus hindering any substantive evaluation of their potential effectiveness or adequacy.

This reliance on unspecified future measures raises considerable concern, especially in light of the sensitive nature of the receiving environment. The coastline of West Lewis is home to clean coastal waters and crucial habitats that are susceptible to

disturbance and contamination from sediment. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental spills involving chemicals or oil, it does not sufficiently outline the strategies to prevent, control, or monitor these occurrences.

Further uncertainty arises regarding the size and dynamics of sediment plumes that may result from the seabed disturbance and the installation of cables. The lack of robust modelling and explicitly defined management strategies renders it impossible to ascertain the potential extent, duration, or ecological consequences of these impacts. This uncertainty also extends to effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether suitable safeguards are in place for responding to pollution incidents. This deferral introduces procedural risks and diminishes the capability of the competent authority to appraise environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the stipulations set forth by the Environmental Impact Assessment regime. Significant effects and proposed mitigations should be assessed prior to consent, and without this critical information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements that pertain to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

Furthermore, the proposal poses substantial risks to marine species due to the underwater noise generated by construction activities. The anticipated high-energy hammer piling over an extended duration is expected to create disturbances that affect a wide area, notably impacting local species such as dolphins. The predicted disturbance to a significant segment of the bottlenose dolphin population raises urgent

concerns; however, the application minimises the importance of these effects, lacking sufficient evidence to support its claims.

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

Moreover, the assessment neglects to consider cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without an integrated evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or avert unacceptable impacts on marine biodiversity, thus precluding any conclusion that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the proposed onshore infrastructure is significantly lacking and does not account for the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are interconnected, yet the assessment treats them separately, leading to a disjointed understanding that obscures the true magnitude of both environmental and socio-economic repercussions.

Onshore components include cabling that traverses protected moorland, the construction of a substation close to Stornoway, and necessary access routes through vulnerable landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, recognised as a crucial carbon store and ecologically sensitive environment. The application fails to deliver a thorough assessment of these impacts, limiting the ability to grasp the overall environmental footprint of the project.

The exclusion or postponement of the assessment for onshore impacts hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively. However, the division between offshore and onshore elements results in an incomplete

understanding of the combined effects on peatlands, habitats, and local communities.

Furthermore, there are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not adequately show that the effects on these habitats have been thoroughly assessed or that effective avoidance measures have been implemented, leaving a distinct gap in evidence concerning biodiversity protection.

Additionally, the routing of infrastructure through operational croft land raises potential conflicts with existing land use and legal rights. The application does not substantiate that the necessary consents or processes have been properly initiated, which casts doubt on the feasibility and lawful execution of the project.

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

In summary, the fragmented treatment of project components, the absence of a comprehensive assessment, and the failure to provide clear evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, thereby impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding nocturnal wildlife and dark skies represents a significant evidential gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly emerging sectors like astro-tourism. The proposed introduction of permanent red aviation lighting, which would be visible over considerable distances, threatens to create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly alarming given the crucial role dark skies play in the area's identity. The absence of these assessments indicates a substantial gap in the landscape and environmental evaluation.

Additionally, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased risks of collision. The lack of a lighting impact assessment or phototaxis study means that there has been no evaluation of how the proposed aviation lighting may impact these species or contribute to increased mortality rates.

The situation is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity and the associated risks. Other species like Kittiwakes, which may forage or migrate at night, are equally at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data leads to a critical lack of understanding concerning ecological impacts.

Without a thorough assessment of nocturnal effects, 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, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. Furthermore, it undermines the overall assessment of landscape and seascape impacts, as the night-time character is an essential aspect of the environment.

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

TOURISM

The application does not adequately assess the potential impacts on tourism, which is a critical component of the Isle of Lewis economy. Tourism relies heavily on the region's unspoiled coastline, beautiful landscapes, dark skies, and a sense of isolation. While it is noted that 86% of visitors are attracted by the scenic beauty, the application fails to provide a quantitative analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, generating over 1,000 jobs and constituting up to 16% of the island's economy. Nevertheless, the application lacks a model to evaluate how the industrialisation of the seascape and the deterioration of environmental quality could impact the Tourism Gross Value Added and the broader economic resilience of the island. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or detract from a vital and expanding sector.

Moreover, the importance of environmental quality in attracting tourists has been overlooked. The significance of untouched landscapes and dark skies to visitor experiences, as well as the potential for emerging markets like nature-based tourism and astro-tourism, is inadequately addressed. The lack of a Dark Skies Assessment exacerbates this shortfall, resulting in a substantial gap in understanding the potential

impacts on this recognised and growing facet of the local economy.

For an island community with limited economic diversification, the omission of a tourism impact assessment raises broader concerns about employment, local enterprises, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate a net benefit. It contradicts strategic goals that prioritise tourism as a growth sector and lacks 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 that drive visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This deficiency hampers a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, especially when evaluated against statutory duties, national policy, and evidential standards. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Presenting the project now under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing does not address these persistent concerns.

There are significant gaps in the baseline data, and the application relies on an undefined design envelope, which raises questions about the reliability of the evidential basis for determination. The proposed mitigation measures remain unspecified, while crucial impact pathways—such as those affecting nocturnal wildlife, the complete onshore infrastructure, and potential tourism effects—have been omitted. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, there are evident failings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the failure to provide the full Social Impact Assessment is a significant omission. Such deficiencies obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

Furthermore, the proposal stands in direct conflict with National Planning Framework 4. It does not adequately demonstrate protection of biodiversity, natural areas, or

cultural heritage. There is no evidence of acceptable health and wellbeing impacts, and the absence of tourism impact modelling fails to provide proof of a net economic benefit. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks presented remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes contradictory. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The myriad information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct any lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or utilise the relevant regulatory provisions to demand the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B72D24C6

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

Dear Sir/Madam

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

The application does not provide an adequate evidential basis for a lawful determination. There is a lack of critical environmental data, while baseline information is both limited and inconsistent. Moreover, key aspects of the proposal remain undefined. The flexible design framework complicates the assessment of likely significant effects, and reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects unsupported by robust evidence.

There are evident and serious policy conflicts present. The proposal does not appear to comply with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4. These conflicts are especially pertinent in relation to biodiversity, natural environments, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and impair the competent authority's capacity to determine the development's acceptability within policy frameworks.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, gives rise to considerable concerns regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential inadequacies, and clear non-compliance with policy highlight that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives within the application is fundamentally deficient and fails to satisfy the legal obligations of the Environmental Impact Assessment framework. Instead of offering a structured and reasoned analysis of viable alternatives grounded in environmental consequences, the documentation merely recounts the evolution of the project. This narrative fails to adequately demonstrate that less harmful options have been thoroughly identified, evaluated, and chosen over more detrimental solutions.

Furthermore, there is a lack of transparent, evidence-based comparisons concerning alternative offshore sites, development sizes, or design layouts. Notably, the application does not indicate that the developer has genuinely considered placing turbines further offshore, a move that would likely mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the critical relevance of proximity to the shore in assessing impact, necessitates such an analysis; its absence undermines any assertion that the proposed siting constitutes the least damaging option.

This inadequacy is also reflected in the assessment of cable routing and landfall, where there is a failure to provide sufficient evidence that alternative routes have been meaningfully investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a coherent avoidance strategy and the absence of comparative analysis indicate that mitigation by design has not been adequately considered, relying instead on measures to be implemented after the design phase.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through considerations of site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be established that the proposal aligns with sustainable or policy-compliant standards.

From a policy standpoint, this inadequacy jeopardises adherence to National Planning Framework 4, particularly concerning the safeguarding of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative evaluation is a significant oversight that leads to the overall conclusion that the application has not been properly evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species presents significant deficiencies that compromise an accurate understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its sensitivity and biological activity; however, the incomplete baseline data and inadequate methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, the evaluation lacks a reliable evidential basis for assessing

potential impacts.

A critical shortcoming is the assessment of otters, a European Protected Species. The application fails to adequately recognise their active use of the coastal regions for foraging and movement. Without a thorough consideration of their core foraging ranges and behaviours, the potential impacts from construction disturbances, noise, and increased activity are not sufficiently evaluated. This lack of detail undermines any assertions regarding the absence of significant effects on otters.

Additionally, there are substantial gaps in the evaluation of basking sharks, with the assessment relying heavily on aerial surveys that introduce notable detection biases, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that show a frequent use of the area by these sharks. The omission of such critical data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings lead to findings of negligible or non-significant effects being based on assumptions instead of solid evidence. The lack of comprehensive baseline data also hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty about the true extent of the risks faced by marine species and their 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 assessment of protected species remains inadequate. The uncertainty inherent in these findings obstructs the ability to exclude adverse effects beyond reasonable scientific doubt, thereby activating the precautionary principle. Under such circumstances, granting consent would not be lawful.

In summary, the combination of insufficient 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 robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development presents significant flaws, marked by considerable gaps in evidence and internal inconsistencies that call its conclusions into question. Located within crucial foraging areas and migratory pathways, the development on the west coast of the Isle of Lewis impacts internationally important seabird populations, many of which are already in decline. The application does not adequately demonstrate that these species will remain unaffected, failing to robustly evaluate risks such as displacement, collision, or habitat loss.

A notable contradiction arises within the application itself, as the developer concludes

there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. Furthermore, the assessment lacks sufficient information regarding the impact on seabirds linked to protected areas, including the Lewis Peatlands and St Kilda. It does not fully acknowledge the significance of these feeding grounds, and the reliance on modelling introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Methodologies used may underestimate mortality rates, particularly in situations where baseline data is lacking and behavioural responses remain poorly understood.

The placement of turbines within a recognised migratory corridor presents an additional serious risk, effectively obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly examine the long-term consequences of sustained mortality in this corridor or the implications for species with small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential standard required to demonstrate no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, which impedes any lawful conclusion that could support consent.

Moreover, the deficiencies noted reflect a lack of compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to confirm that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

Overall, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings hinder a proper evaluation of impacts and lead to the conclusion that the application does not meet the necessary statutory requirements for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Furthermore, the visual impact is not represented adequately within the application. The size and proximity of the turbines would overshadow views from residential areas,

historic locations, and popular coastal sites, thereby directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not convey the significance of this impact within the context of such a sensitive landscape.

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is significantly lacking and does not include the necessary details to adequately evaluate potential environmental impacts. There is a proposed undertaking of substantial seabed preparation and installation work in a high-energy Atlantic environment; however, the application fails to provide

fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be established after consent has been granted, which hampers any meaningful assessment of their potential effectiveness.

This reliance on undefined future measures is particularly alarming given the sensitivity of the environment it affects. The West Lewis coastline features clean coastal waters and vital habitats that are susceptible to sediment disruption and pollution. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not supply adequate information on how these risks will be prevented, managed, or monitored.

Moreover, there remains uncertainty 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 consequences of these impacts. This uncertainty also extends to potential repercussions for marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs any evaluation of whether suitable safeguards are in place to address pollution incidents. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the 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 measures must be evaluated before consent is granted, and in the absence of such information, a lawful determination cannot be achieved. The application also does not demonstrate compliance with policy requirements regarding 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 contribute to a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, further reinforcing the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant deficiencies in the assessment of onshore infrastructure, failing to address the comprehensive range of impacts associated with what constitutes a single integrated project. While the offshore turbines and onshore works are inherently connected, they have been evaluated separately, resulting in a fragmented analysis that obscures the true extent of environmental and socio-economic consequences.

The onshore components of the project encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is recognised as a significant carbon store and an ecologically sensitive habitat. The lack of a thorough assessment concerning these impacts precludes a complete understanding of the project's overall environmental footprint.

Furthermore, the exclusion or deferral of onshore impact assessments obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively; however, the current separation of offshore and onshore components means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Significant risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy, have not been fully appraised within the application. It remains unclear whether appropriate avoidance measures have been implemented, thus highlighting a substantial evidential gap in relation to biodiversity protection.

The proposal also raises critical concerns regarding carbon balance. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that conflicts with the aims of renewable energy development. The application does not sufficiently address this matter nor does it convincingly demonstrate that the overall carbon balance remains favourable.

In addition, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application fails to provide adequate evidence that necessary consents or processes have been initiated, which raises questions concerning the deliverability and lawful implementation of the project.

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 conflict with the National Marine Plan and National Planning Framework 4. Moreover, the inability to showcase that adverse impacts can be avoided or mitigated further weakens the application.

In summary, the disjunction in assessing project components, the absence of a comprehensive evaluation, and the insufficient evidence regarding environmental and land use impacts culminate in an application that is incomplete and unreliable, thus hindering a lawful determination.

TOURISM

The economic contribution of tourism to the Isle of Lewis has increased significantly, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to provide a thorough assessment of how large-scale offshore infrastructure could impact tourism, which relies heavily on the area's wild coastline, nearly pristine landscape, dark skies, and sense of remoteness. Despite acknowledging that 86% of visitors are attracted by the scenery, there is no quantified analysis of the potential effects on visitor numbers, behaviour, or overall economic contribution.

Furthermore, the assessment neglects the critical role of environmental quality in sustaining tourism, particularly regarding the significance of unspoiled landscapes and dark skies for visitor experiences. The omission of a Dark Skies Assessment exacerbates the inadequacy of this evaluation, resulting in a major gap in understanding the impacts on the growing sectors of nature-based tourism and astro-tourism.

In an island community with limited economic diversification, the lack of analysis on tourism impacts poses broader concerns for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately evaluated as stipulated by the Islands (Scotland) Act 2018. Additionally, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to show net benefits. It contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to assess the economic consequences of the proposal.

Collectively, the inadequacies in quantifying tourism impacts, evaluating environmental influences on visitor behaviour, and recognising the economic dependency of the island create a significant evidential gap. This gap obstructs a comprehensive evaluation of economic effects, leading to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. It echoes the critical concerns that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application, despite being presented under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not adequately address these issues.

There are significant deficiencies in the evidential basis required for determination. The application lacks comprehensive baseline data, relies on an undefined design envelope, and depends on unspecified mitigation measures. Additionally, it omits essential impact pathways such as those affecting nocturnal wildlife, full onshore

infrastructure, and the potential tourism effects. As a result, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of significant effects and residual impacts.

Procedural shortcomings are also evident. The failure to produce a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the incomplete disclosure of the Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These failures render the application unsuitable for determination.

The proposal conflicts directly with the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural habitats, or cultural heritage. Additionally, it fails to provide evidence of acceptable health and wellbeing impacts and lacks tourism impact modelling necessary to substantiate any net economic benefit. The assessment of cumulative impacts, both offshore and onshore, has not been adequately conducted, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the proposal are uncertain and could be significant. Evaluations related to 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, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of 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, the disruption of cultural and visual connections, and the adverse effects on tourism represent lasting impacts that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The considerable information gaps, alongside policy inconsistencies and unresolved environmental risks, hinder the ability to reach a lawful and evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or require the submission of the missing information.

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

Additional Comments

As a photographer who loves the Outer Hebrides, any impact upon coastal views should ideally be avoided. Whilst I'm broadly in favour of such schemes, the location needs to limit the visual impact.

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: 720249F5

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 fundamentally flawed, lacking a comprehensive, transparent, and reliable evaluation of the potential environmental

impacts of the proposal. The incorporation of a flexible Project Design Envelope, which does not commit to particular turbine sizes, arrangements, or configurations, introduces a substantial level of uncertainty. This approach hampers the ability to apply a consistent worst-case scenario, thereby compromising the assessment's integrity. Consequently, the impacts outlined may not accurately represent the final development, leaving both the public and the competent authority without a clear understanding of the actual environmental consequences.

The application places excessive reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be rectified later prevents a meaningful assessment of the effectiveness of these measures or the evaluation of residual impacts. Deferring critical information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies be clearly defined before any determination is made.

Furthermore, there are considerable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the scale and significance of potential impacts, especially when 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 scientific uncertainties that cannot meet 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 invokes the precautionary principle, particularly concerning protected species and vulnerable habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it does not convincingly establish that impacts have been thoroughly assessed or that suitable safeguards exist.

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

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives within the application is significantly deficient and does not satisfy the legal obligations of the Environmental Impact Assessment framework. Instead of offering a thorough and reasoned analysis of feasible alternatives based on their environmental ramifications, the application provides a narrative detailing the project's evolution. This method fails to prove that less damaging options have been adequately identified, assessed, and chosen over more harmful solutions.

Moreover, the application lacks a transparent or evidence-driven comparison of alternative offshore locations, development scales, or design configurations. Notably, it does not show that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the crucial role of proximity to the shore in assessing impact, the absence of such an analysis makes it impossible to determine whether the proposed siting is indeed the least damaging option.

These shortcomings are also 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. 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 through design has not been utilised, with an over-reliance on measures intended for post-design mitigation.

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

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly regarding the preservation of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a significant shortcoming that leads to the conclusion that the application has not undergone sufficient scrutiny and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The marine ecology and protected species assessment lacks the necessary completeness and reliability to fully understand the ecological receptors present in the West Lewis coastal environment. This region is both sensitive and biologically active; however, the baseline data is inadequate, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment fails to establish a robust evidential foundation for evaluating potential impacts.

Among the critical shortcomings is the insufficient recognition and assessment of otters, a European Protected Species, which actively utilise coastal areas for foraging and movement. The assessment neglects to account for their core foraging range and behavioural patterns, leading to an inadequate evaluation of how construction disturbance, noise, and increased activity might affect them. This significant omission

undermines any conclusions regarding the lack of considerable effects on the species.

Additionally, there are notable deficiencies in the assessment of basking sharks, with the reliance on aerial surveys creating a substantial detection bias, particularly under Atlantic conditions. This methodological choice is likely to lead to an underestimation of their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. The failure to incorporate or appropriately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological limitations highlighted result in a reliance on assumptions rather than sound evidence, particularly regarding conclusions of negligible or non-significant effects. Furthermore, the absence of comprehensive baseline data hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime or National Planning Framework 4, as it has not adequately identified or assessed the protected species present. The uncertainty introduced by these deficiencies prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that severely undermine 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 meet the required evidential standard to demonstrate that these species will not be adversely affected. The development's location within key foraging areas and migratory pathways is critical, yet the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

There exists a fundamental contradiction within the application, as the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions lack support from the underlying evidence. Furthermore, the assessment does not provide sufficient proof that seabirds associated with

protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is insufficiently considered, and reliance on modelling approaches introduces considerable uncertainty, particularly for species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies applied are likely to underestimate mortality rates, particularly when baseline data is incomplete and behavioural responses are not fully understood.

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

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and undermines the legal basis for a conclusion in support of consent. The deficiencies noted also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings obstruct a robust evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is not adequate. It does not recognise the West Lewis coastline as a living cultural landscape where the environment, language, tradition, and community are connected. The application takes a simplistic approach, viewing heritage as isolated, static assets instead of understanding their ongoing social, cultural, and spiritual roles in the community.

A significant shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These places serve as active sites for burial and spiritual practices, yet the assessment classifies them as unchanging features, overlooking their current use and significance, as well as the development's effect on their setting. This misunderstanding leads to an incomplete evaluation of cultural effects and ignores their importance in community life.

The application also neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are crucial to the area's identity but are

entirely missing from the assessment, which is a major oversight. Without considering these factors, it is impossible to fully understand the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement weakens the validity of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural failure in the lack of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This alone prevents a lawful decision.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, deviates from policy requirements.

In summary, the failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been properly assessed, and the application lacks a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding the assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This absence creates a notable evidential gap, hindering both public understanding and the competent authority's capacity to grasp the full scope of social risks highlighted in the developer's research.

Summaries that are available reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are therefore not mere speculation. Nonetheless, the lack of disclosure of the complete assessment limits proper scrutiny and undermines the significance of these findings in the decision-making process.

The proposal is also viewed as a threat to community identity and cohesion, with findings indicating "cultural loss" identified in the developer's own research. Despite these critical insights, they have not been sufficiently integrated into the main application or given the weight they deserve. The decision to withhold the full Social

Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this scale, particularly in relation to community character and functioning. Without the complete dataset, the application fails to provide an adequate evidential basis to assess the balance between potential benefits and harm.

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

The implications of these procedural shortcomings are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the absence of the full Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

magnitude of visual impact has been downplayed, compromising the assessment's reliability.

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

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

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

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

In summary, the assessment does not accurately reflect the magnitude of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings preclude a dependable evaluation and affirm the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

This dependence on undefined future measures raises serious concerns, particularly given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate

detail on the prevention, control, or monitoring of these risks.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also affects potential consequences for marine species and habitats that have already been recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a stage after consent, the application obstructs an evaluation of whether appropriate safeguards are established to manage pollution incidents. This introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment framework. Significant likely effects and mitigation measures must be assessed before consent is granted, and the absence of such information renders a lawful determination unachievable. Additionally, the application does not demonstrate compliance with policy requirements associated with environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These issues inhibit a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of the potential impacts on marine life and fisheries is inadequate and lacks a thorough assessment of both ecological and socio-economic effects. The fishing industry is active in the waters off the West Lewis coast, which also hosts a diverse marine ecosystem. However, the application does not sufficiently demonstrate that these activities and habitats can be safeguarded from significant disruption.

A major concern is the assumption that fishing activities can be moved without repercussions. The application does not provide evidence that alternative fishing locations are available, accessible, or able to handle increased pressure. This is a critical gap, as displacing fishing efforts risks overfishing in other areas and could lead to broader economic challenges for the local fishing fleet. Without a clear, evidence-based evaluation, the consequences for fisheries and local livelihoods remain unclear.

The proposal poses notable risks to marine species, particularly due to the underwater noise produced during construction. The extended use of high-energy hammer piling is expected to create disturbances over considerable distances, potentially affecting marine mammals such as dolphins. There are serious worries regarding the predicted

disruption to a significant segment of the local bottlenose dolphin population, yet the application diminishes the importance of these effects without sufficient evidence.

The application also exhibits a clear contradiction by recognising the necessity for licences to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency damages the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

Furthermore, the assessment neglects to consider the cumulative impacts resulting from various pressures, such as habitat disruption, noise, and fishing displacement. Without a thorough examination of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can operate alongside existing marine users or prevent unacceptable harm to marine biodiversity, which obstructs any conclusion regarding the proposal's sustainability.

Overall, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions lead to an incomplete and unreliable assessment. These issues hinder a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant shortcomings in its assessment of onshore infrastructure, which is critical to understanding the full impact of what is fundamentally an integrated project. The offshore turbines and the associated onshore works are interdependent, yet they have been evaluated separately. This division results in a fragmented analysis that fails to capture the comprehensive environmental and socio-economic repercussions.

Among the onshore elements are cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through delicate landscapes. Notably, the excavation required for these works occurs in areas of deep peat, particularly in Barvas Moor, which serves as an important carbon store and is an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a complete understanding of the project's environmental footprint.

By postponing or omitting the evaluation of onshore impacts, the application obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered collectively, yet the segregation of offshore and onshore components obscures the total impacts on peatlands, habitats, and local communities.

There are serious risks posed to sensitive habitats, including machair systems and peatland environments that enjoy policy protection. The application fails to adequately demonstrate that the impacts on these habitats have been fully considered or that effective avoidance measures have been applied, leading to a significant evidential gap concerning biodiversity protection.

Concerns about carbon balance also arise from the proposal. Disturbing peatland results in the release of stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this critical issue or show that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the required consents or processes have been initiated, casting doubt on the project's feasibility and lawful implementation.

From a policy standpoint, the failure to assess the project as a whole, alongside the inability to ensure protection for peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate effective avoidance or mitigation of impacts further diminishes the reliability of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation regarding dark skies and nocturnal wildlife represents a substantial gap within the Environmental Impact Assessment. The proposal is set to introduce permanent red aviation lighting that would produce a "wall of light" effect visible over extensive distances along the West Lewis coastline, which is known for its exceptionally dark skies. This alteration would not only impact the night-time environment but would also detract from the environmental quality, cultural identity, and tourism value of the area.

Furthermore, the assessment fails to consider how this lighting would affect visual amenity, landscape character, and the experiences of residents and visitors. Such omissions are particularly pertinent given the significance of dark skies for the area's identity and the burgeoning tourism sector focusing on astro-tourism. Consequently, the absence of these considerations creates a notable deficiency in the overall environmental and landscape assessment.

Equally alarming is the lack of an impact assessment on nocturnal wildlife. Species

such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit sensitivity to artificial lighting, potentially leading to disorientation and an elevated risk of collision. The application does not provide a lighting impact assessment or a study on phototaxis, failing to consider how the proposed aviation lighting might influence these species or contribute to increased mortality.

This oversight is further exacerbated by the use of daytime survey data in the ornithological assessment, which does not account for nocturnal behaviour or associated hazards. For instance, Kittiwakes, which may forage or migrate during the night, are susceptible to disorientation from artificial lighting; however, this risk has not been adequately evaluated. The lack of site-specific data concerning night-time activity results in a critical shortcoming in understanding the ecological impacts.

In the absence of nocturnal impact assessments, it remains impossible to ascertain whether protected species or designated sites would face adverse effects. The requisite evidential standard needed to exclude such effects beyond reasonable scientific doubt cannot be satisfied, necessitating the application of the precautionary principle and thereby preventing a lawful determination.

From a policy standpoint, the failures in the assessment conflict with National Planning Framework 4, which mandates the protection of natural places and environmental quality. This lack of assessment also diminishes the overall evaluation of landscape and seascape impacts, as the character of night-time settings is integral to the environment.

In summary, the complete absence of evaluation regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The shortcomings in baseline data, impact modelling, and species-specific analysis leave the application incomplete and incapable of supporting a lawful determination.

TOURISM

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails fundamentally to meet the requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. The application echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains deficient.

There are significant gaps in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duty established under the Islands (Scotland) Act 2018. The omission of a full Social Impact Assessment further complicates matters, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are substantial enough to render the application unfit for determination.

The proposal conflicts directly with National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, largely due to the absence of tourism impact modelling. Additionally, the cumulative impact of offshore and onshore components has not been properly assessed, obscuring effects on 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 internally inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

Collectively, these issues render the application procedurally and substantively unfit for determination. The significant information deficiencies, combined with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or enforce the relevant regulatory provisions to obtain the missing information.

In light of these factors, 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: 455B2420

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environmental conditions, and strong cultural heritage. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis for lawful determination. Important environmental data is absent, baseline information is both limited and inconsistent, and key proposal elements remain undefined. The flexible design framework employed hampers a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed assessment of environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust evidential support.

Furthermore, the proposal presents clear and substantive conflicts with policy. It 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. The application does not adequately demonstrate adherence to national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable from a policy perspective.

The unprecedented scale of this proposal poses significant concerns due to the large turbines being positioned in close proximity to the shoreline, raising issues related to landscape capacity, visual dominance, and environmental impact. In summary, the combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance signifies that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and lacks a full, transparent, and reliable depiction of the anticipated environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and obstructs the application of a worst-case scenario. This compromises the integrity of the assessment, rendering the impacts presented potentially inconsistent with the actual development, thus hindering both public understanding and the competent authority's comprehension of the true environmental repercussions.

Consent is requested with a reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Such an approach results in environmental harm being addressed post-consent, thereby obstructing a meaningful evaluation of effectiveness and the assessment of residual impacts. This postponement of vital information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly identified prior to determination.

Moreover, the application is characterised by significant evidential shortcomings, including gaps in baseline data, methodological limitations, and a dependency on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions are drawn indicating negligible or non-significant effects without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it is unsubstantiated that impacts have been comprehensively 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 insufficient. These shortcomings obstruct a lawful and thorough assessment of environmental effects, thereby placing the competent authority in a position where it cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, falling short of the statutory requirements set out by the Environmental Impact Assessment regime. Instead of a structured and reasoned comparison based on environmental effects, it presents a narrative of the project's evolution. This approach does not demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The lack of consideration for placing turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts, is particularly concerning. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the omission of such analysis undermines any assertion 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 explored adequately to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy, coupled with a lack of comparative analysis, indicates that mitigation through design has not been considered, relying instead on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a clear failure to adhere to the established mitigation hierarchy, thus hindering the competent authority's ability to ascertain whether less harmful and more appropriate alternatives exist. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, this deficiency contradicts the principles outlined in National Planning Framework 4, particularly those concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a significant oversight, leading to the conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A significant oversight concerns otters, which are classified as a European Protected

Species. The application does not appropriately recognise or assess their active use of coastal zones for foraging and movement. By failing to consider their core foraging range and behavioural patterns, the assessment does not adequately evaluate the potential impacts of construction disturbances, noise, and increased activity, thereby undermining any conclusions about the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment that contains significant gaps in evidence and internal inconsistencies, which undermine its conclusions. The west coast of the Isle of Lewis hosts internationally important seabird populations that are already in decline. However, the application fails to demonstrate to the required evidential standard that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the development, yet the assessment lacks a robust evaluation of the implications regarding displacement, collision risk, or habitat loss.

A notable contradiction arises in the application, where the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is typically warranted only when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment,

indicating that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment inadequately addresses the potential impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly considered, and reliance on modelling approaches introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality due to incomplete baseline data and an insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor creates a considerable risk, effectively establishing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately assessed, nor are the potential effects on species with relatively small global populations given the necessary attention.

From a regulatory standpoint, the application does not fulfil the evidential threshold required to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and modelling deficiencies, means that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, which precludes a lawful conclusion in favour of consent.

Moreover, the deficiencies outlined reflect 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 deemed unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These failings obstruct a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for a proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment inadequately addresses cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than recognising heritage as an evolving entity with social, cultural, and spiritual significance, the application simplifies it into isolated, static assets.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, which serve as active places for burial and spiritual practice. The assessment categorises these sites as static features, ignoring their continued relevance and the impact that development could have on their settings. This mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance to community life.

Furthermore, the assessment fails to account for intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity yet are completely overlooked, which represents a significant gap in the analysis. Without considering these aspects, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its unique cultural identity recognised as Indigenous, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and disregards well-established principles that emphasise participation in decisions impacting cultural and environmental matters.

Moreover, a critical procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment obstructs the competent authority from fulfilling its legal obligation to evaluate social, cultural, and economic impacts on the island community. This alone undermines the lawfulness of the determination.

From a policy perspective, these deficiencies directly conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage and the disregard for living cultural practices clearly diverge from required policy standards.

Collectively, the oversight of living heritage, intangible cultural values, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application fails to offer a robust foundation for understanding the genuine cultural cost associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment which included focus groups with local residents; however, the full report has not been published. This absence represents a significant evidential gap and inhibits both the public and the competent authority from fully understanding the social risks identified in the developer's research. Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are thus not speculative in nature. Nonetheless, the non-disclosure of the complete assessment limits scrutiny of the findings and restricts the ability to determine their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's

findings. Despite this, such impacts have not been fully incorporated into the main application nor given the appropriate weight they merit. Withholding the complete Social Impact Assessment obscures the true human and social cost associated with the development.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is severely lacking and does not truly capture the extent of change nor the sensitivity of the environment in question. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines near the shoreline would create an unbroken and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

Furthermore, the application fails to accurately depict the magnitude of the visual change. Due to their size and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of these impacts in relation to such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. There is evidence to suggest that the viewpoints chosen may not

adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and areas of high landscape value. This raises the possibility that the true extent of the visual impact has been minimised, thus compromising the reliability of the assessment.

Moreover, there is a critical failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This goes beyond a mere visual impact; it represents a broader cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, this proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural spaces and historic assets. The degree of change proposed is incompatible with the need to protect landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy adherence.

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

In conclusion, 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 confirm that the proposal is incompatible with the protection of this precious landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. The current proposal entails substantial seabed preparation and installation works within a high-energy Atlantic environment; however, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate potential environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided in the application, which instead relies on mitigation and contingency measures that are to be prepared post-consent. This reliance on undefined future measures raises significant concerns regarding the sensitivity of the receiving environment.

The application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills but fails to deliver adequate information on how these risks will be prevented, controlled, or monitored. Moreover, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, which include potential effects on marine species and habitats already recognised as sensitive within the broader assessment.

Furthermore, the absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application obstructs any evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines the competent authority's capacity to assess environmental protection measures prior to determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed before consent; the omission of such information renders a lawful determination unfeasible. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with the application is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast not only support a diverse marine ecosystem but also house an active fishing industry. However, the application does not adequately demonstrate that these habitats and uses can be maintained without considerable disruption.

A significant concern is the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds are accessible, available, or able to bear additional pressure. This oversight is critical, as displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a well-supported assessment, the impacts on fisheries and the livelihoods of those dependent on them remain unclear.

The proposal also poses considerable risks to marine species, particularly due to

underwater noise generated during construction activities. The use of high-energy hammer piling for extended periods is likely to cause disturbances over large areas, potentially affecting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns. Nevertheless, the application minimizes the significance of these effects, lacking adequate supporting evidence.

There is an evident contradiction in the application concerning the necessity for licences to authorise harm to European Protected Species, while concurrently describing such impacts as negligible. This inconsistency undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly where harm is expected to a level that requires legal authorisation.

Moreover, the assessment does not take into account cumulative impacts 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 fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not illustrate that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, which hinders any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development involves offshore turbines alongside significant onshore infrastructure, including cabling and a substation near Stornoway. However, the assessment of these onshore components is materially incomplete, failing to acknowledge the interconnected nature of the project. This fragmented approach obscures the overall scale of the environmental and socio-economic impacts that arise from the project.

Among the onshore elements is the cabling which crosses protected moorland, alongside access infrastructure that traverses sensitive landscapes. Excavation activities will take place in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, which hinders a full understanding of the project's overall environmental footprint.

The failure to evaluate onshore impacts prevents a proper assessment of cumulative effects, which is essential according to the Environmental Impact Assessment process. By treating the offshore and onshore components separately, the application fails to fully account for their combined impacts on peatlands, habitats, and local communities.

Sensitive habitats, including machair systems and peatland environments that are under policy protection, face significant risks from the proposed project. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, resulting in a clear evidential gap concerning biodiversity protection.

Moreover, the proposal raises concerns about carbon balance, as the disturbance of peatland could lead to the release of stored carbon, creating a carbon debt that contradicts the objectives of renewable energy development. This critical issue is not addressed adequately in the application, leaving uncertainty about whether the overall carbon balance remains beneficial.

The routing of infrastructure through active croft land also introduces potential conflicts with existing land use and legal rights. There is no evidence in the application that the necessary consents or processes have been initiated, which raises questions about the deliverability and lawful execution of the project.

From a policy perspective, the lack of a holistic assessment of the project, alongside failure to protect peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The application lacks an assessment of dark skies and nocturnal wildlife, which is a significant omission in the Environmental Impact Assessment. The coastline of West Lewis features exceptionally dark skies that contribute to environmental quality, cultural identity, and tourism. However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive light effect across the western horizon, fundamentally changing the night-time environment.

There is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important as dark skies play a critical role in the area's identity and the growth of sectors like astro-tourism. The absence of this analysis creates a clear gap in the overall landscape and environmental assessment.

Moreover, impacts on nocturnal wildlife have not been evaluated. 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 increased risk of collision. The application fails to include any assessment of lighting impacts or phototaxis studies, meaning the potential effects on these species and the risk of increased mortality remain unexamined.

This issue is further complicated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data leaves a critical gap in understanding ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites would face adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, which invokes the precautionary principle and impedes a lawful determination.

From a policy standpoint, this omission goes against National Planning Framework 4 concerning the protection of natural places and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time is an essential part of the environment.

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

TOURISM

The application inadequately assesses the potential impacts on tourism, which is a vital component of the Isle of Lewis economy. Tourism is deeply rooted in the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted to the scenery, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure could influence visitor numbers, behaviour, or the economic contribution of tourism.

This sector has seen considerable growth, escalating from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and subsequent loss of environmental quality would impact the Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an essential and expanding sector.

Furthermore, the significance of environmental quality in promoting tourism is neglected. The unspoiled landscapes and dark skies are crucial for enhancing visitor experiences and for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a substantial gap in understanding the impacts on a recognised and burgeoning part of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate the impacts on tourism has broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities inherent to the area have not been adequately addressed, contrary to the requirements set forth in the Islands (Scotland) Act 2018.

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

Overall, the deficiencies in quantifying tourism impacts, assessing the environmental factors that drive visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This shortfall hampers a thorough evaluation of economic effects and reinforces the conclusion that the application is lacking.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal presents significant shortcomings in meeting the criteria for sustainable development as outlined by statutory obligations, national policy, and evidential standards. The issues identified in the application mirror those that led to the rejection of the Lewis Wind Power proposal in 2008, with concerns regarding the scale of industrialisation being deemed unacceptable. This current application is being put forward within a more robust policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

However, the application lacks a comprehensive and reliable evidential foundation for assessment. There are notable deficiencies in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and missing assessments of key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment remains incomplete, hindering a thorough understanding of the likely significant effects or residual impacts.

Additionally, there are evident procedural failures. The absence of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, and the lack of a full Social Impact Assessment is a material oversight. These

gaps impede the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal also stands in direct contradiction to National Planning Framework 4. It fails to adequately safeguard biodiversity, natural landscapes, and cultural heritage, does not demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to insufficient tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain unaddressed. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, contradictory. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been met, thus invoking the precautionary principle and preventing a lawful conclusion that the impacts are acceptable.

Moreover, the proposal would lead to considerable and irreversible alterations to a delicate 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 will result in permanent effects that cannot be mitigated to an acceptable extent.

In summary, the application is procedurally and substantively inadequate for determination. The multitude of information deficiencies, combined with conflicts with policy and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority is compelled to either deny consent on these grounds or utilise the relevant regulatory provisions to demand the submission of the outstanding information.

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

Additional Comments

I am so downhearted on many levels about this development. I grew up on the West Side of Lewis and many's an evening one beaches in Ness.

On many levels this project has eroded my confidence in democracy, honesty and man's self interest when it suits them.

Over the last few decades we've had Greenpeace and other activists fight to save our planets eco systems. Reduce fishing, cut back hunting, mitigation to preserve bird numbers. No fracking on shore, projects such as the space launch project in Sutherland stopped because of the importance of peatland.

Now however none of these things matter because an international company, supported by elected members who dare not disclose in their own manifestos their support for such projects , because local people would not support this annihilation of the eco systems, visual impact and people's wellbeing.

My brother and myself were looking at putting pods onto land inherited from my grandparents. An opportunity to bring economic stimulation to the area and create work. We won't be doing that if this project and its associated inland projects go ahead.

I've recently spent over £500k building a holiday home for rent, again to stimulate growth and encourage tourism. This project affects my confidence that tourists will visit our beautiful island.

As I referenced before I was shocked by how under wraps these projects were whilst going through planning. Yet I know of local contractors who have been encouraged to spend hundreds of thousands of pounds on equipment, buying real estate and so on, promised that they'd get work on the back of these projects even though planning consent had not been granted. It's a scandal how local democracy has been smashed.

I have family members who are considering leaving the island, lots of people are selling their homes to get away from the industrialisation of our land.

The culture and heritage of our island is already under threat, having workers work 24/7 will substantially change the look and feel of our island.

Our fore fathers fought for the right to have their own crofts, once again the high and mighty few are making decisions that besmirch the names of those gone before us and now shines a light on how poorly thought of are the people of Lewis and the wider Highlands and Islands

Shame on those behind this project. I object wholeheartedly against this going ahead.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C8A3284A

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 founded upon an examination of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies across planning, environmental, cultural, and procedural dimensions. The project is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

There is an evident lack of an adequate evidential basis for a lawful determination. Crucial environmental data is absent, baseline information is insufficient and inconsistent, and many aspects of the proposal remain ill-defined. The application employs a flexible design framework that obscures a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation fails to facilitate a complete or informed understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects not backed by robust evidence.

The proposal also reveals substantial policy conflicts. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate considerations, and environmental integrity. Such conflicts directly impact the statutory tests essential for consent, thereby undermining the ability of the competent authority to determine that the development is acceptable within policy frameworks.

Moreover, the unprecedented scale of the proposal, with large turbines positioned close to the shoreline, introduces significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential weaknesses, and notable policy non-compliance indicate that the application is incomplete and insufficient for supporting a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

Significant evidential deficiencies are also present, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This results in uncertainties about the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot align with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which is essential to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of a structured and reasoned comparison of realistic alternatives based on their environmental effects, the documentation presents a narrative of the project's evolution. This method does not demonstrate that less harmful options have been

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

Moreover, there is a lack of transparency and an absence of an evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has sufficiently considered the possibility of placing 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 of proximity to shore in determining impact, the lack of such analysis undermines any argument that the proposed siting is the least damaging option.

The deficiencies are further evident in 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 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, with an over-reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This lack of adherence to the established mitigation hierarchy obstructs the competent authority from determining whether less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal is sustainable or compliant with policy.

From a policy standpoint, these shortcomings compromise adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, leading to the 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, failing to provide a thorough understanding of the ecological receptors in the West Lewis coastal environment. This marine system is both sensitive and biologically active, yet the baseline data is insufficient, and the methodologies applied do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential foundation for evaluating impacts.

A critical oversight is the treatment of otters, a European Protected Species, where the application inadequately recognises and assesses their use of coastal areas for foraging and movement. The failure to account for their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly evaluated. This significantly undermines the conclusions regarding the absence of notable effects on this species.

There are further shortcomings in the assessment of basking sharks, as the reliance on aerial surveys introduces significant detection bias, particularly in Atlantic conditions. This approach is likely to underestimate their presence, especially in light of established land-based observations that indicate frequent usage of these waters. By not incorporating or properly considering such data, the assessment presents an incomplete baseline and diminishes the reliability of its conclusions.

These methodological deficiencies 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 a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns regarding the true extent of risks faced by marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. The site on the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately demonstrate that these species will remain unaffected by the proposed development. Key foraging areas and migratory pathways are located within the project area, yet the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A major inconsistency arises within the application, as the developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation. This derogation is typically needed only when significant harm is anticipated, thus casting doubt on the reliability of the assessment and suggesting that its conclusions lack supporting evidence. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will remain unharmed. The importance of these feeding grounds has not been fully addressed, and the use of modelling approaches introduces uncertainty, particularly

for declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines in a recognised migratory corridor poses an additional risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term impacts of increased mortality in this corridor or consider the effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the necessary evidential threshold to assert no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and undermines any lawful conclusion in favour of consent.

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

Overall, the assessment is unreliable due to inconsistencies, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of the impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development encompasses both offshore turbines and onshore infrastructure, which are inherently interconnected. However, the current assessment fails to consider them as a single integrated project, leading to a fragmented analysis that does not accurately reflect the comprehensive environmental and socio-economic impacts. The onshore components consist of cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and a habitat of ecological sensitivity. The application does not deliver a thorough evaluation of these impacts, thus hindering an understanding of the overall environmental footprint of the project.

Moreover, the application's exclusion or postponement of the assessment of onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; yet, the distinct assessments of offshore and onshore elements result in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities. There are considerable risks posed to sensitive habitats, such as

machair systems and peatland environments, which are safeguarded by policy. The application fails to demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, thereby creating a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as disturbances to peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable. Furthermore, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. There is no evidence within the application that necessary consents or processes have been initiated, which raises issues concerning both deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project in its entirety and to ensure the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and the National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further compromises the credibility of the application. Collectively, the disjointed assessment of project components, the lack of a thorough evaluation, and the absence of evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, preventing a lawful determination.

TOURISM

The application does not adequately assess the impacts on tourism, which is a vital sector for the Isle of Lewis. This sector relies heavily on the area's natural features, including its wild coastline, nearly untouched landscapes, dark skies, and the feeling of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, the assessment lacks a numerical evaluation of how large offshore structures might influence visitor numbers, their behaviour, or their overall economic contributions.

Tourism has experienced significant growth, increasing from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and constituting about 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and a decline in environmental quality would affect Tourism Gross Value Added or the economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would benefit the economy or harm this established sector.

Additionally, the evaluation overlooks the critical role that environmental quality plays in supporting tourism. This includes the necessity of unspoiled landscapes and dark skies for visitor satisfaction and for emerging sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a significant lack of understanding regarding impacts on an important and growing aspect of the local economy.

In an island community that has limited economic diversity, neglecting 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 properly evaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4, especially regarding economic impacts and the necessity to demonstrate net benefits. It also contradicts strategic goals that identify tourism as a key growth sector and does not furnish enough evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the lack of quantification of tourism impacts, the failure to assess the environmental factors influencing visitor behaviour, and the disregard for the island's economic dependencies create a substantial evidential gap. This gap hinders a thorough examination of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates a significant failure to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application reiterates the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

There are substantial gaps in the evidential basis needed for a thorough determination. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of essential impact pathways—including nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences—raise serious concerns. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a complete understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment constitutes a significant omission. These deficiencies hinder the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling.

Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy inconsistencies, and unresolved environmental risks obstructs the possibility of a lawful and evidence-based decision. The competent authority should either reject the application on these grounds or employ the appropriate regulatory mechanisms to demand the submission of the missing information.

In light of these concerns, I respectfully request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I feel that this Wind Farm is too large and will cause a huge impact of disruption, especially during construction with noise and vibrations being heard along the West coast of Lewis as it's fairly close to shore.

The movement of necessary large machinery and turbine parts will cause much noise, regular road closures and traffic blockages as well as environmental ground damage at compound sites and loss of croft/grazing land with wide access tracks.

These Turbines are an ANTI GREEN measure as the other sad effect of these mega structures is the killing of huge numbers of seabirds.

These numbers have been proven to be understated in many other Developers Environmental Impact Studies

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: A85B1BA0

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation has revealed numerous deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance.

The location of the proposal is significant, situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. The unprecedented scale of the project raises serious questions about its compatibility with statutory requirements and national policy, as well as its adherence to the principles of sustainable development. The positioning of large turbines near the shoreline poses significant concerns regarding their visual impact, landscape capacity, and overall environmental consequences.

The application lacks a robust evidential foundation necessary for a lawful determination. It is characterised by missing critical environmental data, inconsistent baseline information, and undefined key aspects of the proposal. The reliance on a flexible design framework complicates the assessment of potential significant effects, while the unspecified mitigation measures hinder any evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by adequate evidence.

Moreover, there are substantial policy conflicts present in the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment requirements, and National Planning Framework 4, particularly in areas concerning biodiversity, natural habitats, cultural heritage, and community health and wellbeing. The application does not sufficiently demonstrate compliance with national mandates to safeguard biodiversity, address climate change, or uphold environmental integrity. Such discrepancies are critical, as they directly affect the statutory tests needed for consent, undermining the capacity of the competent authority to deem the development acceptable from a policy standpoint.

In light of the considerable absence of information, reliance on vague mitigation strategies, evidential shortcomings, and evident policy violations, it is clear that the application is incomplete and cannot sustain a lawful determination. In these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or dependable account of the anticipated environmental consequences of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to definitive turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty obstructs the consistent application of a worst-case scenario, ultimately undermining the integrity of the assessment and making it impossible for both the public and the competent authority to comprehend the actual extent of environmental effects.

Consent for the application is sought primarily on the basis of unspecified mitigation measures, monitoring strategies, and management plans that have yet to be established. This approach defers crucial information to post-consent stages, which is procedurally unacceptable. It conflicts with the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to determination.

Furthermore, there are critical evidential deficiencies, including significant gaps in baseline data, limitations in methodology, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, especially when conclusions about negligible or non-significant effects are made without robust supporting data. Such a lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, including stipulations about biodiversity protection and environmental integrity, as it cannot be proven that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and rigorous assessment of environmental effects and mean that the competent authority is not positioned to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of realistic alternatives based on their environmental effects, the application presents a narrative of project evolution. This method does not show that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts are likely to be reduced. The West Lewis coastline is sensitive, and the proximity to the shore is crucial in determining impact. The absence of this analysis means it cannot be concluded that the proposed siting is the least damaging option available.

The shortcomings also apply to 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 and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been effectively implemented, resulting in a reliance 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 indicates a failure to follow the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more appropriate alternatives exist. Without a thorough assessment of alternatives, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species lacks completeness and reliability, failing to provide a thorough understanding of ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, but the baseline data is insufficient, and the methodologies used do not adequately capture species presence, behaviour, and habitat utilisation. Consequently, the assessment does not offer a strong evidential basis for evaluating potential impacts.

In particular, the application overlooks otters, a European Protected Species. It does not appropriately acknowledge or assess their usage of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an inadequate evaluation of the potential effects of construction disturbance, noise, and increased activity. This gap undermines any conclusions regarding the lack of significant effects on this species.

Moreover, the assessment of basking sharks is inadequate, relying heavily on aerial surveys that introduce a significant detection bias, especially under Atlantic conditions.

This method is likely to underestimate their presence, especially when compared to established land-based observations that show frequent utilisation of these waters. The failure to include or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings indicate that conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This raises uncertainties 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 or National Planning Framework 4, as it fails to adequately identify or assess protected species. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Given these circumstances, granting consent is not lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application raises significant concerns regarding its reliability, primarily due to internal inconsistencies and methodological shortcomings. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines, yet the application does not convincingly demonstrate that these species will remain unaffected. Key foraging areas and migratory pathways are directly impacted by the proposed development, but the assessment fails to adequately evaluate crucial factors such as displacement, collision risk, and habitat loss.

There exists a fundamental contradiction within the application. The developer asserts that no significant adverse effects will occur, while simultaneously pursuing a Habitats Regulations derogation case, which is applicable only when significant harm is anticipated. This inconsistency raises doubts about the validity of the assessment and suggests that its conclusions lack adequate evidential support. Furthermore, the assessment does not sufficiently account for the seabirds associated with protected sites like the Lewis Peatlands and St Kilda, and the importance of these feeding grounds remains underrepresented. The reliance on modelling approaches introduces uncertainty, particularly for vulnerable species such as Kittiwakes and Fulmars, as the methodologies employed are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

The siting of turbines within a recognised migratory corridor presents another considerable risk, creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. Long-term implications of sustained mortality in this corridor are not thoroughly assessed, nor are the potential effects on species with relatively small global populations considered.

Regulatory standards demand that evidence demonstrates no adverse effect on the integrity of protected sites, yet this application does not meet the necessary evidential threshold. The presence of contradictory conclusions, coupled with data gaps and modelling deficiencies, prevents a lawful conclusion in support of consent and engages the precautionary principle. Additionally, these deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These failings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is significantly flawed, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, traditions, and community are deeply intertwined. The application approaches heritage in a limited manner, viewing it merely as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet they are mischaracterised as mere static features. This oversight neglects their continuing use and meaning, as well as the impact that development may have on their surroundings. Such misrepresentation leads to an incomplete assessment of cultural implications and overlooks their integral role in community life.

Moreover, the application does not take into account the intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment. These elements are essential to the area's identity but are wholly omitted from the assessment, which is a critical gap. Without addressing these factors, the cultural implications of the development cannot be fully grasped.

Concerns about community rights and engagement further exacerbate the situation. The Gaelic-speaking community has a unique cultural identity that aligns with

recognised characteristics of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent, which undermines the validity of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a significant procedural flaw in the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the process unlawful.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to recognise living cultural practices, constitutes a clear violation of policy standards.

In summary, the inadequate assessment of living heritage, intangible cultural value, community rights, and legal responsibilities results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application lacks a sufficient foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is significantly lacking and does not provide the transparency necessary for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, but the full report remains unpublished. This creates a serious evidential gap, making it impossible for both the public and the competent authority to grasp the full extent of the social risks highlighted by the developer's own research.

Summaries that are available suggest that residents are already experiencing significant stress, anxiety, and concern due to the scale and proximity of the proposal. These effects are based on direct engagement rather than speculation. However, the absence of the complete assessment hinders a thorough examination of these findings and restricts the ability to ascertain their importance in the decision-making process.

There is also an indication that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” mentioned in the developer’s own findings. Nevertheless, these impacts have not been adequately incorporated into the main application or given proper consideration. Withholding the full Social Impact Assessment clouds the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and

functioning may be at risk. By failing to provide the complete dataset, the application does not establish a thorough evidential foundation for weighing the benefits against the harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and minimise harm, yet existing evidence points to adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy cannot be established.

The procedural implications are substantial. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a significant flaw within the application and a failure to satisfy the evidential criteria of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing negative impacts, renders the assessment inadequate and unreliable. This situation obstructs a lawful determination and supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development raises significant concerns regarding its impact on the landscape, seascape, and cultural heritage of the West Lewis area. The assessment provided does not sufficiently address the scale of the proposed changes or the sensitivity of the surrounding environment. The coastline is characterised by an open Atlantic horizon and an undeveloped, remote atmosphere. The installation of large-scale turbines near the shoreline would introduce a pervasive industrial element that fundamentally transforms the landscape in a permanent and irreversible manner.

Moreover, the magnitude of the visual change has not been adequately represented within the application. Given the size and proximity of the turbines, they would dominate views from residential areas and historic sites, as well as from popular coastal locations. This situation would significantly undermine visual amenity and diminish the area's essential qualities of naturalness and remoteness. The assessment fails to convey the true level of this impact, particularly within such a sensitive landscape.

Methodological issues have also been identified concerning the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and valued landscapes. This oversight raises concerns that the extent of visual impact has been understated, compromising the credibility of the assessment.

Additionally, the application overlooks the vital connections between landscape,

seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a larger landscape context that is visually and spatially linked to the Atlantic horizon. Rather than acknowledging these interdependencies, the assessment treats these assets as isolated, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would sever these critical relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This transformation represents not only a visual issue but also a broader cultural and spatial harm that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural environments and historic assets. The scale of the proposed changes is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines the argument for compliance with established policy.

It is evident that the identified impacts are unlikely to be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Consequently, the resulting changes would be fundamental and permanent, rather than amenable to reduction through mitigation measures.

Overall, the assessment inadequately portrays the extent of the impact, the sensitivity of the environment, and the interconnectedness of the landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks associated with the proposal is significantly inadequate and lacks the necessary detail to properly assess the potential environmental impacts. The initiative entails extensive seabed preparation and installation operations in a high-energy Atlantic setting, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent has been granted, thereby obstructing any thorough assessment of their adequacy or effectiveness.

This dependency on unspecified future measures raises considerable concerns, particularly in light of the sensitivity of the receiving environment. The coastline of West Lewis is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges certain risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail regarding the prevention, control, or monitoring of these risks.

Furthermore, there is ambiguity surrounding the magnitude and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty further extends to the potential effects on marine species and habitats that have already been identified as vulnerable in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application precludes an evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the ability of the competent authority to adequately 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. It is essential that significant effects and mitigation strategies be evaluated prior to granting consent; failure to provide such information renders a lawful determination unachievable. Additionally, the application does not satisfactorily demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty regarding possible impacts culminate in a materially deficient assessment. These deficiencies hinder a rigorous evaluation of construction and pollution risks, further reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, which the application does not sufficiently protect or maintain from significant disruption. The assessment of fisheries and marine life lacks a robust evaluation of the ecological and socio-economic impacts involved. A critical concern lies in the application's assumption that fishing activities can be displaced without consequence. There is no evidence provided to show that alternative fishing grounds are available, accessible, or capable of sustaining the additional pressure that such displacement would entail. This lack of information is crucial, as it poses a risk of overfishing in other areas, potentially leading to wider economic implications for the local fishing fleet.

Moreover, the proposal raises substantial risks to marine species, especially due to underwater noise generated during construction activities. High-energy hammer piling is anticipated to create disturbances over extensive distances, adversely impacting species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population generates serious concerns, yet these effects are downplayed in the application without adequate supporting evidence.

The application contains a notable inconsistency where the necessity of licences to permit harm to European Protected Species is acknowledged, while simultaneously characterising impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly where harm is foreseen that requires legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the project fails to provide a complete assessment of onshore infrastructure, which results in an incomplete understanding of the impacts associated with what is a single integrated project. It is essential to recognise that the offshore turbines and the onshore works are intrinsically linked; however, they are assessed separately, creating a fragmented approach that obscures the true scale of the environmental and socio-economic effects.

Onshore elements of the project include cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is a significant carbon store and an ecologically sensitive habitat. The application does not present a comprehensive assessment of these impacts, which hinders a full understanding of the project's overall environmental footprint.

Moreover, by excluding or deferring the assessment of onshore impacts, the application limits the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together, yet the disconnection between the offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, both of which receive policy protection. The application fails to demonstrate that the impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented. This omission creates a significant evidential gap concerning biodiversity protection.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is characterised by exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the tourism sector. However, the Environmental Impact Assessment completely omits the assessment of dark skies and nocturnal wildlife, representing a significant gap. The proposal includes permanent red aviation lighting, which would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

This application does not address the impacts of the proposed lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area's identity and the emerging sector of astro-tourism, this lack of assessment is particularly concerning. Furthermore, there is no evaluation of how this lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and increased collision risks. The absence of a lighting impact assessment or phototaxis study fails to address these crucial effects.

The reliance on daytime survey data in the ornithological assessment further complicates the matter, as it does not capture nocturnal activity or its associated risks. Species like Kittiwakes, which might forage or migrate at night, are vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

Without a proper assessment of nocturnal impacts, it is impossible to determine 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, invoking the precautionary principle and hindering a lawful determination.

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

Overall, the absence of any assessment regarding dark skies and nocturnal wildlife creates a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unable to support 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 application for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies that undermine its compliance with sustainable development requirements as mandated by statutory duties and national policy. It echoes the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presently, this application is set against a more rigorous policy framework that emphasises the importance of biodiversity, the protection of peatlands, the integrity of landscapes, and the wellbeing of communities.

A critical examination reveals that the proposal lacks a complete and reliable evidential foundation necessary for determination. Notable gaps exist in baseline data, with the application relying on an undefined design envelope and unspecified mitigation measures. Additionally, crucial impact pathways have been overlooked, including effects on nocturnal wildlife, the full spectrum of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment fails to adequately address likely significant effects or residual impacts.

Moreover, the application demonstrates procedural shortcomings. The absence of a compliant Island Communities Impact Assessment signifies a breach of statutory obligations under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment results in a material omission. These shortcomings inhibit the competent authority from fully evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage, nor does it substantiate acceptable impacts on health and wellbeing. Furthermore, the absence of tourism impact modelling fails to demonstrate a net economic benefit. The cumulative effects of offshore and onshore components have not been thoroughly assessed, masking potential impacts on peatlands, carbon balance, habitats, and

crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thus invoking the precautionary principle and hindering a lawful determination of acceptable impacts.

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

Overall, the application is both procedurally and substantively unfit for determination. The array of information deficiencies, alongside policy inconsistencies and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should either reject the application on these grounds or exercise the relevant regulatory provisions to mandate the submission of the missing information.

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

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: 278A47DF

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline, raising significant concerns regarding landscape capacity, visual dominance, and environmental impact. Furthermore, critical environmental data is missing, and baseline information is limited and inconsistent. Key aspects of the proposal remain undefined, and the reliance on a flexible design framework prevents a clear understanding of likely significant effects. The absence of sufficient information, reliance on undefined mitigation measures, and evidential weaknesses demonstrate that the application is incomplete and incapable of supporting a lawful determination.

There are clear and substantive policy conflicts as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency particularly pertains to biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met, undermining the ability of the competent authority to conclude that the development is acceptable in policy terms.

In addition, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not supported by robust evidence, and the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development is fundamentally questionable. In these circumstances, the precautionary principle must apply, as the application does not provide an adequate evidential basis for a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The methodologies employed in assessing marine ecology and protected species are fundamentally flawed, resulting in an unreliable understanding of the ecological receptors within the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the incomplete baseline data means that the presence, behaviour, and habitat use of various species have not been adequately captured. The implications of this are significant, as it undermines the validity of the assessment in evaluating potential impacts.

A critical oversight is evident concerning otters, a European Protected Species. The application does not properly acknowledge their active utilisation of coastal areas for

foraging and movement. The omission of their core foraging range and behavioural patterns means that the assessment fails to consider the potential effects of construction disturbances, noise, and increased activity on these animals. Consequently, the conclusions drawn regarding the absence of significant effects on otters lack a solid evidential basis.

The assessment of basking sharks also suffers from notable deficiencies, particularly due to the reliance on aerial surveys which introduces significant detection bias in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially in light of land-based observations that indicate these waters are frequented by the species. The disregard for such pertinent data results in an incomplete baseline and undermines the reliability of the conclusions drawn.

As a result of these methodological shortcomings, the claims of negligible or non-significant effects are based on assumptions rather than robust evidence. Furthermore, the lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This fosters uncertainty about the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. The failure to properly identify and assess protected species introduces a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, thus rendering the granting of consent unlawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented is fundamentally flawed, with numerous gaps in evidence and contradictions that seriously undermine its conclusions. It fails to provide adequate assurance that the internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing decline, will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the development, yet the implications of displacement, collision risk, and habitat loss are not thoroughly examined.

A critical inconsistency arises within the application itself. The developer claims there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which should only occur if significant harm is anticipated. This contradiction raises serious doubts regarding the credibility of the assessment,

suggesting that its conclusions lack support from the underlying evidence.

The assessment does not convincingly demonstrate that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these vital feeding grounds is inadequately considered, and reliance on modelling techniques introduces a degree of uncertainty, particularly concerning declining species like Kittiwakes and Fulmars. The methodologies used appear to underestimate mortality rates, especially given the absence of complete baseline data and a full understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor introduces a substantial risk, effectively creating an obstacle in a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to conduct a thorough assessment of the long-term effects of sustained mortality in this corridor or the potential repercussions for species with relatively small global populations.

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

Moreover, the identified deficiencies represent a breach of the National Planning Framework 4, particularly concerning the protection of biodiversity and the safeguarding of natural assets. The inability to substantiate that internationally important seabird populations will remain unaffected places the proposal in direct opposition to national policy.

In summary, the assessment's reliability is compromised due to its internal contradictions, methodological flaws, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements essential for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for the introduction of large-scale turbines near the West Lewis coastline raises significant concerns regarding its impact on seascape, landscape, and visual integrity. The coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a profound sense of remoteness. The presence of these turbines would lead to a continuous industrial presence that fundamentally changes this character, resulting in a permanent and irreversible transformation of the landscape.

The application does not adequately illustrate the extent of the anticipated visual change. The turbines' size and proximity would dominate views from residential areas, historic sites, and popular coastal locations. This would detract from visual amenity

and undermine the essential qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact in a landscape of such sensitivity.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. It appears that certain viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This suggests that the magnitude of the visual impact may be understated, casting doubt on the assessment's reliability.

Additionally, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated entities disregards their interdependence and leads to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This results in not only visual repercussions but also a more profound cultural and spatial degradation that has not been adequately addressed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The proposed changes are at odds with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

Moreover, the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant. Thus, the resultant change is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Collectively, the assessment fails to represent the full extent of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

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

A major concern is the assumption that fishing activity can be relocated without consequences. There is no evidence presented that alternative fishing grounds are

available, accessible, or suitable to accommodate increased pressure. This lack of information is critical, as such displacement poses a risk of overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, understanding the implications for fisheries and local livelihoods becomes impossible.

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

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

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

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

In conclusion, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a proper evaluation of the effects on marine life and fisheries.

TOURISM

The tourism sector on the Isle of Lewis has experienced notable growth, with its value increasing from £65 million in 2017 to over £81.5 million, generating more than 1,000 jobs and contributing up to 16% of the island's economy. However, the planning application lacks a comprehensive assessment of the potential impacts on this vital sector. Despite acknowledging that 86% of visitors are attracted by the area's stunning scenery, the application fails to quantify how large-scale offshore infrastructure might alter visitor numbers, behaviours, or economic contributions.

Tourism relies heavily on the area's unspoiled coastline, near-pristine landscapes, and dark skies, all of which enhance the visitor experience. The assessment neglects to consider the significance of environmental quality in tourism, including the emerging markets of nature-based and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, leaving a crucial gap in understanding how the proposed development could impact these growing sectors of the local economy.

In a community with limited economic diversification, the failure to evaluate the effects on tourism has broader implications for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment means that the economic vulnerabilities inherent in this situation have not been properly examined, as mandated by the Islands (Scotland) Act 2018.

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

Collectively, the deficiencies in quantifying tourism impacts, understanding the environmental drivers influencing visitor behaviour, and considering the island's economic reliance culminate in a significant evidential void. This absence hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

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

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

There are also significant procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands

(Scotland) Act 2018. Additionally, the non-disclosure of the complete Social Impact Assessment represents a substantial omission. These issues inhibit the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is inconsistent with National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural environments, and cultural heritage. Furthermore, it fails to provide evidence that health and wellbeing impacts are acceptable and lacks modelling of tourism impacts, which undermines claims of a net economic benefit. The cumulative effects of both offshore and onshore components have not been adequately assessed, thereby obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E6BDC55F

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a thorough review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The unprecedented scale of the proposal introduces large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual impact, and environmental consequences. The application lacks a sufficient evidential foundation necessary for a lawful determination. It is characterised by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed results in an inability to fully understand the likely significant effects of the development. Furthermore, the reliance on unspecified mitigation measures means that their potential effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to lack of robust supporting evidence.

The proposal also exhibits clear and substantive conflicts with established policy. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not adequately demonstrate that it can meet national obligations for the protection of biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable in policy terms.

In light of these issues—insufficient information, undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy—the application is deemed incomplete and incapable of supporting a lawful determination. Therefore, the precautionary principle should be invoked in response to these concerns.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings and lacks a complete, transparent, and reliable evaluation of the potential environmental

effects of the proposal. The introduction 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 compromises the integrity of the assessment, making it impossible for both the public and the competent authority to grasp the true extent of environmental impacts that may arise from the development as ultimately constructed.

Additionally, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental damage will be managed later hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This postponement of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation strategies be clearly established prior to decision-making.

Furthermore, there are notable evidential inadequacies, including lapses in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the magnitude and significance of impacts, particularly where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not fulfil the evidential requirements set forth under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and vulnerable habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, specifically concerning biodiversity protection and environmental integrity, as it cannot verify that impacts have been thoroughly assessed or that appropriate safeguards have been established.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively undermine the reliability and completeness of the Environmental Impact Assessment Report. These deficiencies obstruct a lawful and thorough assessment of environmental effects, rendering the competent authority incapable of making a well-informed determination based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The application presents significant shortcomings in its assessment of alternatives, failing to meet the requirements set out by the Environmental Impact Assessment regime. It does not offer a structured and reasoned comparison of realistic alternatives based on their environmental effects; instead, it provides 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.

A lack of transparent, evidence-based comparisons is evident regarding alternative offshore locations, development scales, and design configurations. Notably, the application does not illustrate that the developer has sufficiently considered the option of placing turbines further offshore, where potential visual, ecological, and coastal impacts could be significantly lessened. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in impact determination, the omission of such analysis undermines any argument that the proposed siting is the least damaging available option.

The inadequacies extend to the evaluation of cable routing and landfall assessment, with insufficient evidence showing that alternative routes have been rigorously explored to mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The failure to provide a clear avoidance strategy or comparative analysis suggests that the application has not adequately employed mitigation by design, instead relying on post-design mitigation measures.

Consequently, the application does not illustrate that environmental harm has been minimised through careful site selection, layout planning, and infrastructure routing. This lack of adherence to the established mitigation hierarchy impedes the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. The absence of a comprehensive assessment of alternatives raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, these deficiencies jeopardise adherence to National Planning Framework 4, particularly concerning the protection of natural spaces, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment represents a material omission that ultimately leads to the conclusion that the application has not been sufficiently assessed and, as such, cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species fails to provide a complete understanding of ecological receptors within the West Lewis coastal environment, which is a sensitive and biologically active marine system. The baseline data is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, this lack of comprehensive data undermines the assessment's reliability for evaluating potential impacts.

A significant oversight is the inadequate recognition and assessment of otters, which are a European Protected Species. The application does not properly address their active use of coastal areas for foraging and movement. This omission means that the potential effects of construction disturbances, noise, and increased human activity have not been sufficiently evaluated, thereby questioning the conclusions drawn about the absence of significant effects on this species.

Moreover, the assessment of basking sharks is flawed due to a reliance on aerial surveys, which introduce significant detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to consider such critical data results in an incomplete baseline and detracts from the reliability of the conclusions presented.

The methodological shortcomings lead to assertions of negligible or non-significant effects based on assumptions rather than robust evidence. The lack of adequate baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This contributes to uncertainty regarding the true extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainties introduced prevent the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Given these conditions, lawful consent cannot be granted.

In summary, the assessment's reliance on incomplete baseline data, flawed methodologies, and unsupported conclusions renders it unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application 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 proposed development undermines the recognition of the West Lewis coastline as a vibrant cultural landscape, where the environment, language, tradition, and community are deeply interconnected. The application adopts a narrow perspective, viewing heritage merely as static assets instead of acknowledging their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming of the proposal is its treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice, yet the assessment reduces them to static features, neglecting their ongoing use and significance, as well as the potential impacts of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural effects and fails to appreciate their importance in community life.

The assessment also neglects to address intangible aspects of cultural heritage, such as the Gaelic language and the traditions linked to the coastal environment, which are vital to the area's identity. The absence of these elements from the evaluation is a serious oversight. Without considering these aspects, the true cultural implications of the development remain obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as Indigenous People, yet the absence of a Free, Prior and Informed Consent process undermines the validity of the assessment. This lack of meaningful engagement does not align with established principles of participation in matters impacting cultural and environmental interests.

A further critical failing is the lack of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to fulfil its legal obligations to assess the social, cultural, and economic effects on the island community, rendering any determination unlawful.

These deficiencies in the assessment place the proposal in direct conflict with the National Planning Framework 4, particularly concerning the protection of historic sites and cultural assets. The failure to account for both tangible and intangible heritage, along with the disregard for living cultural practices, demonstrates a clear deviation from policy standards.

Collectively, the neglect to assess living heritage, intangible cultural values, community rights, and statutory requirements creates a substantial evidential gap. The cultural impacts of the development remain inadequately evaluated, and the application lacks a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal under consideration raises significant concerns regarding social impacts, health, and wellbeing, as the assessment conducted is materially deficient and lacks the required transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the full report has not been made available to the public. This omission creates a considerable evidential gap, hindering both public understanding and the competent authority's ability to grasp the complete extent of social risks identified by the developer's own research.

Residents have already reported measurable levels of stress, anxiety, and concern as a direct result of the proposal's scale and proximity. These documented impacts stem from direct engagement with the community and are not speculative in nature. Nonetheless, the non-disclosure of the complete assessment limits scrutiny of these findings and affects the determination of their significance within the decision-making process.

The proposal has been perceived as a direct threat to community identity and cohesion, with references to “cultural loss” appearing within the developer’s findings. Despite such concerns, these impacts have not been adequately integrated into the main application or given proper consideration. By withholding the full Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency further undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this nature, particularly when they may affect community character and functioning. The failure to provide the complete dataset renders the application inadequate in presenting a reliable evidential basis for weighing benefits

against harm.

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

The procedural implications are noteworthy. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential requirements set forth by the Environmental Impact Assessment framework.

In summary, the decision to withhold the full Social Impact Assessment, in conjunction with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This situation prevents a lawful determination and underscores the conclusion that the application is not substantiated 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 assessment provided lacks the necessary detail to effectively evaluate the potential environmental effects of the proposed construction and pollution risks. This project entails significant seabed preparation and installation work in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application leans on mitigation and contingency measures that would only be formulated after consent is granted. This approach limits the ability to assess their adequacy and effectiveness meaningfully.

The reliance on undefined future measures raises significant concerns, particularly given the sensitive nature of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate details on how these risks will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty

further extends to the potential effects on marine species and habitats that are already identified as sensitive within the broader assessment.

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

From a regulatory standpoint, the postponement of vital environmental safeguards is at odds with the Environmental Impact Assessment requirements. It is essential to assess likely significant effects and associated mitigation before consent can be granted; failure to provide such information renders a lawful determination impossible. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These deficiencies obstruct a robust evaluation of construction and pollution risks and strongly indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant concerns regarding its assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these vital uses and habitats will be safeguarded from disruption.

A notable issue is the presumption that fishing activities can be relocated without adverse effects. The application lacks any evidence that alternative fishing grounds are available or can support the additional pressure caused by displacement. This significant gap raises the potential for overfishing in other areas, with possible wider economic repercussions for the local fishing fleet. Without a comprehensive and evidence-backed assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The use of high-energy hammer piling over prolonged periods is expected to disturb a wide area, impacting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

The application also exhibits a contradictory stance regarding the need for licences for harm to European Protected Species, while simultaneously characterising the impacts

as negligible. This inconsistency undermines the credibility of the assessment and raises questions about adherence to the Habitats Regulations, particularly when harm is anticipated to a degree that necessitates 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 a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application fails to demonstrate that impacts on these critical habitats have been thoroughly

assessed or that suitable avoidance measures have been put in place, resulting in a significant evidential gap concerning biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon. This lighting is visible over long distances and fundamentally alters the night-time environment. A significant concern arises from the absence of an assessment regarding the impacts of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Dark skies are a key component of environmental quality, cultural identity, and tourism value in the West Lewis coastline, which is characterised by exceptionally dark skies. The lack of consideration for the importance of dark skies, particularly in relation to emerging sectors such as astro-tourism, creates a substantial gap in the Environmental Impact Assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife, despite the presence of sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are susceptible to disorientation and increased collision risk due to artificial lighting. The application fails to include a lighting impact assessment or phototaxis study, thereby neglecting to evaluate how the aviation lighting might affect these species and potentially increase mortality rates. The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not capture 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 assessed.

The lack of site-specific night-time data presents a critical gap in understanding the ecological impacts of the proposal. Without a thorough assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites would be adversely affected. Consequently, the evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be met, which engages the precautionary principle and prevents a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the broader assessment of landscape and seascape impacts, as night-time character is an integral aspect of the environment. Overall, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The application lacks baseline data, impact modelling, and species-specific analysis, rendering it incomplete and incapable of supporting a lawful determination.

TOURISM

The application presents a materially deficient assessment regarding the impacts on tourism, failing to evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and its sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the assessment lacks a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen significant growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application does not model the potential effects of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without such crucial analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or detract from an established and burgeoning sector.

Moreover, the assessment inadequately considers the role of environmental quality in underpinning tourism, notably the value of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a significant gap in understanding the impacts on this recognised and expanding aspect of the local economy.

Given the context of an island community with limited economic diversification, the neglect of tourism impacts bears 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 appropriately evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not illustrate compliance with National

Planning Framework 4, particularly concerning economic impact and the necessary demonstration of net benefit. It also stands in contradiction to strategic objectives that highlight tourism as a priority growth sector, lacking sufficient evidence to enable the competent authority to assess the economic consequences of the proposal adequately.

In summation, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This 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 demonstrates a significant failure to meet the standards of sustainable development as outlined in statutory duties and national policy. It echoes the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, which highlighted the unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application lacks a thorough evidential basis.

There are substantial gaps in the baseline data, the design envelope remains undefined, and the application leans heavily on unspecified mitigation measures. Moreover, it neglects critical impact pathways, particularly regarding nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. This results in an incomplete Environmental Impact Assessment, hindering any comprehensive understanding of significant effects or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment represents a breach of the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment constitutes a serious omission. Such deficiencies inhibit the competent authority from fully evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Conflicts with National Planning Framework 4 further undermine the proposal. It fails to protect biodiversity, natural places, and cultural heritage, does not adequately address 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 assessed thoroughly, clouding the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the project remain uncertain and potentially significant. Evaluations regarding marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and precluding a lawful determination that

the impacts are acceptable.

Additionally, the proposal threatens 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 relationships, and adverse effects on tourism represent permanent impacts that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy conflicts, and unresolved environmental risks precludes a lawful and evidence-based decision. The competent authority must therefore refuse consent based on these grounds or exercise the relevant regulatory provisions to mandate the submission of the necessary information.

A formal request is therefore 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: 71578CBE

Member of the public 753

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

The application does not present a sufficient evidential basis for lawful determination. It lacks critical environmental data, with baseline information being limited and inconsistent, and significant aspects of the proposal are undefined. A flexible design framework complicates the assessment of likely significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unassessed. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

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

The scale of the project is unprecedented for this area, with large turbines situated close to the shoreline, raising significant issues about landscape capacity, visual dominance, and environmental impact. Overall, the lack of sufficient information, the reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should apply.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This current application is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not comply.

Critical deficiencies are evident in the evidential basis for assessment. The application lacks comprehensive baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, it neglects vital impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is insufficient, preventing a thorough understanding of potential significant effects or residual impacts.

Additionally, procedural shortcomings are apparent. The failure to provide a compliant Island Communities Impact Assessment contravenes the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment constitutes a serious omission. These lapses 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 directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage, nor does it prove that health and wellbeing impacts are acceptable. The lack of tourism impact modelling means that net economic benefit cannot be evidenced. Moreover, 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 the proposal remain uncertain and possibly significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and making it impossible to lawfully conclude that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy inconsistencies, and unresolved environmental risks obstructs the possibility of a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or require the submission of the missing information through relevant regulatory mechanisms.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. The developer engaged in a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made public. This gap in evidence prevents both the public and the competent authority from grasping the full extent of the social risks highlighted by the developer's own research.

Summaries that are available show that residents are experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts come from direct engagement and are not based on speculation. The lack of disclosure of the full assessment obstructs proper scrutiny of the findings and diminishes the capacity to assess their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this acknowledgment, these impacts have not been adequately incorporated into the primary application or given the necessary consideration. The failure to release the full Social Impact Assessment obscures the true social and human costs associated with the development.

This absence of transparency compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By withholding the complete dataset, the application fails to provide a comprehensive evidential foundation for assessing the balance of benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must foster positive health outcomes and mitigate harm, yet the evidence currently available suggests there are adverse effects that have not been fully revealed. Without access to the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission is material and represents a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the failure to disclose the full Social Impact Assessment, in conjunction with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This hinders a lawful determination and reinforces the conclusion that the application is not backed by sufficient information.

Personal Comments

These hideous windmills would I'm sure have to cover the entire country to satisfy our thirst for electricity, especially if everyone is also supposed to drive electric cars- for which there's not enough lithium in all the world, I gather. I believe that's the unmentioned price- a nightmare future filled with turbines. Please don't ruin the Hebrides on the way to this realisation. We all just need to live more simply & with less prodigious consumption of resources.

Yours faithfully,

[Redacted]

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which is submitted under relevant marine licensing and Environmental Impact Assessment regimes. The application raises significant concerns related to planning, environmental, cultural, and procedural matters, as identified in a review of the Environmental Impact Assessment Report and associated documents. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks a solid evidential basis necessary for a lawful determination. There is missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework used hinders a clear understanding of potential significant effects, and the unsubstantiated reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not backed by adequate evidence.

Policy conflicts are evident and significant. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency pertains particularly to biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements regarding the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests required for consent and weaken the capacity of the competent authority to determine that the development aligns with policy requirements.

The unprecedented scale of the proposal raises further concerns, with large turbines located close to the shoreline. This positioning creates significant issues relating to landscape capacity, visual dominance, and environmental impact. Overall, the combination of insufficient information, undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicates that the application is incomplete and does not support a lawful determination. In light of these factors, the precautionary principle should apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several critical deficiencies that compromise its reliability and transparency regarding the potential environmental effects of the proposal. A key issue arises from the application of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or

configurations. This introduces significant uncertainty and obstructs a consistent application of a worst-case scenario, thereby undermining the assessment's integrity and obscuring the true extent of environmental effects from both the public and the competent authority.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have not been clearly defined. Seeking consent on the premise that environmental harm will be addressed at a later stage obstructs any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This deferral of crucial information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to any determination.

Additionally, significant gaps exist in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where the application presents conclusions of negligible or non-significant effects devoid of robust supporting data. The lack of sufficient information hampers a comprehensive understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not satisfy the evidential threshold established under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal further fails to demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it does not provide assurance that impacts have been fully assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The proposed application lacks a comprehensive assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a clear, structured comparison of feasible alternatives based on their environmental impacts, it offers a narrative that merely outlines 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.

Moreover, there is a notable absence of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. In

particular, the application does not show that the developer has genuinely considered the possibility of situating turbines further offshore, where visual, ecological, and coastal impacts could potentially be lessened. The sensitivity of the West Lewis coastline is critical, and the significance of proximity to shore in determining impact cannot be overstated. This lack of analysis makes it impossible to conclude that the proposed siting is indeed the least damaging option.

The inadequacies also apply to cable routing and landfall assessments. There is insufficient evidence suggesting that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The failure to provide a clear avoidance strategy, coupled with the absence of comparative analysis, indicates that the application has not adopted mitigation by design, relying instead on post-design mitigation measures.

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

From a policy standpoint, this shortcoming severely undermines adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a material omission that leads to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species demonstrates significant deficiencies, failing to deliver a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is incomplete. Moreover, the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species, resulting in an assessment that lacks a solid evidential basis for evaluating potential impacts.

Notably, the application neglects to properly recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects of construction disturbance, noise, and increased activity. Consequently, this undermines the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is flawed due to a reliance on aerial

surveys, which introduces substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or properly consider such critical data results in an incomplete baseline and undermines 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 hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on the true scale of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment is fundamentally flawed, characterised by significant evidence gaps and internal inconsistencies that jeopardise its conclusions. The development site lies within key foraging areas and migratory pathways for seabirds, particularly along the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. Yet, the application fails to provide the evidential standard required to demonstrate that these species will not be adversely affected.

A crucial contradiction arises in the application, where the developer claims no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary in instances where significant harm is anticipated. This inconsistency undermines the credibility of the assessment, indicating that the conclusions drawn lack support from the underlying evidence. Furthermore, the assessment does not adequately demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly addressed, and the reliance on modelling methodologies introduces uncertainty, especially concerning species facing severe declines like Kittiwakes and Fulmars.

The siting of turbines within a recognised migratory corridor poses an additional

significant risk, as it effectively creates a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. There is an insufficient evaluation 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 meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thwarting a lawful conclusion in favour 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. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct contradiction to national policy. Collectively, these weaknesses render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These issues obstruct a thorough evaluation of impacts and contribute to the overarching conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy in assessing cultural heritage and community identity highlights a fundamental failure to recognise the West Lewis coastline as a dynamic cultural landscape where community, language, environment, and tradition are interconnected. The approach taken in the application is reductive; it treats heritage as isolated, static assets, overlooking their vital ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice. However, the assessment categorises them merely as static features, neglecting their continuous use, meaning, and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural impacts and fails to acknowledge the role these sites play in community life.

Moreover, the assessment entirely overlooks intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the coastal environment and the community. These components are integral to the area's identity, yet they are absent from the analysis, representing a significant gap. Without incorporating these elements, the full cultural impact of the development remains unexamined.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking

population embodies a distinct cultural identity with attributes of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

Additionally, a critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment impedes the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination unlawful.

From a policy standpoint, these shortcomings put the proposal in direct conflict with National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, alongside a failure to recognise living cultural practices, represents a significant departure from policy requirements.

In summary, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts associated with the development remain inadequately assessed, leaving the application without a solid foundation to accurately determine the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment creates a significant evidential gap, which hampers the ability of both the public and the competent authority to grasp the complete range of social risks identified by the developer's own research. While a Social Impact Assessment was commissioned and included focus groups with local residents, the absence of the full report restricts proper scrutiny of its findings. Summaries suggest that residents are already experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are not speculative; they stem from direct engagement with the community.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this, such impacts have not been adequately integrated into the main application or given appropriate consideration. The lack of transparency in withholding the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency undermines the Environmental Impact Assessment process, which necessitates a comprehensive understanding of social, economic, and health impacts, especially for projects of this magnitude that may influence community character and functioning. Without the complete dataset, the application fails to provide a thorough evidential basis to assess the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid harm; however, the evidence available indicates existing adverse effects that remain undisclosed. Consequently, without the full assessment, adherence to this policy cannot be established.

The implications for the procedural aspects are notable. The competent authority cannot effectively carry out a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This situation reflects a material omission within the application, failing to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines near the West Lewis coastline would lead to a continuous industrial presence, fundamentally changing the area's character defined by its open Atlantic horizon and undeveloped nature. This alteration would result in a permanent transformation of the landscape, which has not been adequately assessed in terms of visual impacts.

The application fails to represent the magnitude of the visual change. The close proximity and scale of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, impacting visual amenity and diminishing the naturalness and sense of remoteness in this sensitive landscape. The assessment does not convey the level of this impact or its significance adequately.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that some viewpoints may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This could result in an understatement of the visual impacts, calling the reliability of the assessment into question.

Another deficiency is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that visually and spatially relates to the Atlantic horizon. Instead of recognising this interdependence, the assessment treats these sites as isolated, resulting in an incomplete evaluation of the impact on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon.

This signifies not only a visual impact but also a broader cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 concerning the protection of natural places and historic assets. The anticipated changes are incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment further undermines claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The turbines' scale, height, and proximity would ensure their presence is dominant and unavoidable. The resulting changes would thus be fundamental and permanent, rather than 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 interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of the 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 fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not provide assurance that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity. This lack of compliance raises significant concerns about whether the proposal can be considered sustainable development.

The assessment of fisheries and marine life is inadequate, lacking a thorough evaluation of 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 application does not show that these uses and habitats can be protected or maintained without significant disruption.

A key issue is the assumption that fishing activity can be displaced without repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This is crucial, as displacement could lead to overfishing in other areas and might have wider economic consequences for the local fleet. Without a clear assessment based on evidence, the impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, substantial risks to marine species are introduced, particularly due to underwater noise generated during construction. The use of high-energy hammer piling for extended periods is likely to disturb marine life over large distances, notably affecting dolphins. Concerns arise from the predicted disturbance to a significant portion of the local bottlenose dolphin population, yet the application downplays these effects without adequate supporting evidence.

There is also a contradiction within the application, where the requirement for licences to harm European Protected Species is acknowledged while simultaneously stating

that impacts are negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm is expected to the extent that legal authorisation is necessary.

The assessment neglects to consider cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be determined.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns regarding the routing of infrastructure through active croft land, which may conflict with existing land use and legal rights. There is a lack of evidence indicating that necessary consents or processes have been initiated, leading to questions about the deliverability and lawful implementation of the project.

Moreover, the assessment of the project's onshore infrastructure is materially incomplete, neglecting to consider the full extent of impacts arising from what is a single integrated project. The offshore turbines and onshore works are intrinsically linked, yet they are assessed separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Key onshore elements involve cabling across protected moorland and the construction of a substation near Stornoway, along with associated access infrastructure that traverses sensitive landscapes. Notably, these works require excavation across areas of deep peat, especially within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, inhibiting a full understanding of the project's overall environmental footprint.

The exclusion or deferral of onshore impact assessments prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are considered collectively. However, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

Furthermore, there are significant risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protection. The application does not demonstrate that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented, resulting in a clear evidential gap concerning biodiversity protection.

Additionally, the proposal raises concerns about carbon balance. Disturbing peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment concerning dark skies and nocturnal wildlife is a significant omission within the Environmental Impact Assessment, which undermines the integrity of the proposal. The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the critical role dark skies play in the area's identity and the emerging astro-tourism sector, this oversight represents a notable gap in the overall landscape and environmental assessment.

Equally concerning is the absence of any evaluation regarding the effects 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 heightened risk of collision. The application lacks a lighting impact assessment or a phototaxis study, thereby failing to ascertain how the aviation lighting might affect these species or contribute to increased mortality.

Additionally, the reliance on daytime survey data in the ornithological assessment is inadequate, as it does not account for nocturnal activity or the associated risks. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation caused by artificial lighting; however, this risk remains unassessed. The failure to gather site-specific night-time data creates a critical void in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it becomes impossible to

ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, which invokes the precautionary principle and precludes a lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4, particularly concerning the protection of natural places and the maintenance of environmental quality. Additionally, it detracts from a comprehensive evaluation of landscape and seascape impacts, as the character of night-time is an essential aspect of the environment.

Collectively, the absence of assessments regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The deficiency 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 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 Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the standards of sustainable development as outlined by statutory obligations, national policy, and evidential benchmarks. This application echoes the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Currently, it is presented within a stronger policy framework that emphasises the importance of biodiversity, peatland preservation, landscape integrity, and community wellbeing.

A reliable evidential basis for this application is lacking. It contains critical gaps in baseline data, continues to utilise an undefined design envelope, relies on unspecified mitigation measures, and omits essential impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of significant effects or residual impacts.

Additionally, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a violation of the statutory requirements under the Islands (Scotland) Act 2018. Moreover, the failure to provide the complete Social Impact Assessment represents a significant omission. These shortcomings prevent the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is at odds with National Planning Framework 4. It fails to demonstrate adequate protection of biodiversity, natural places, and cultural heritage. Furthermore, it does not provide evidence that health and wellbeing impacts are acceptable, nor does it show a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has been insufficient, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine

mammals are incomplete and, in some cases, inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been met, which engages the precautionary principle and inhibits a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

This will impact all on the island, and not in a good way. We are getting nothing in return, free, or significantly cheaper electricity should be an automatic given with this. Personally, my business will be affected by this, with the extra traffic etc on the road, guests will be put off staying. The island is not equipped to cater for all the extra workers that will be here, during construction.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B2A7653B

