

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 review of the Environmental Impact Assessment Report and its supporting documentation has revealed numerous material deficiencies across planning, environmental, cultural, and procedural domains. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and robust cultural identity. The scale, proximity, and design of the wind farm raise significant concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful determination. Important environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain unspecified. The employment of a flexible design framework hinders a clear understanding of likely significant effects. Additionally, the reliance on yet-to-be-defined mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

There are notable and significant policy inconsistencies. The proposal appears to conflict with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal in this location, with large turbines located in close proximity to the shoreline, raises serious concerns regarding landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In light of these findings, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a full, transparent, and reliable evaluation of the likely environmental effects of the proposal. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hampers the ability to apply a worst-case scenario consistently. Such an approach undermines the integrity of the assessment, meaning that the impacts presented may not truly reflect the development that will ultimately be constructed. Consequently, both the public and the competent authority are left without a clear understanding of the actual extent of the environmental effects.

Furthermore, the application relies extensively on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. Consent is sought on the premise that any environmental harm will be mitigated at a later stage. This deferral prevents any meaningful evaluation of the effectiveness of those measures and hinders the assessment of residual impacts. It is procedurally unacceptable to postpone key information until post-consent stages, as this contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

In addition to the above issues, there are notable evidential deficiencies within the assessment, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold necessary 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. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to adequately assess impacts or ensure that appropriate safeguards are in place for biodiversity protection and environmental integrity.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and significant 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, leaving the competent authority unable to make a well-informed determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The proposed project exhibits significant shortcomings in its assessment of alternatives, failing to meet the statutory requirements laid out by the Environmental

Impact Assessment regime. Instead of delivering a coherent and reasoned comparison of realistic alternatives based on their environmental impacts, the application merely recounts the evolution of the project. This narrative approach does not adequately demonstrate that less harmful options have been properly identified, evaluated, and selected over more damaging solutions.

There is a clear lack of transparency and evidence in the comparison of alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has given serious consideration to placing turbines further offshore, which could potentially mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the absence of such analysis prevents a conclusion that the proposed siting is the least damaging option available.

The inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been adequately explored to minimise impacts on sensitive receptors. This includes culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis demonstrate that mitigation through design has not been employed, leading to a reliance on post-design measures to address impacts.

Consequently, the application does not prove that environmental harm has been adequately minimised through the choices made regarding site selection, layout, and infrastructure routing. This oversight constitutes a deviation from the established mitigation hierarchy and inhibits the competent authority from determining whether more suitable and less harmful alternatives are available. In the absence of a thorough assessment of alternatives, one cannot conclude that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, these deficiencies call into question the application's alignment with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw that underpins the overall conclusion that the application has not been sufficiently evaluated and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, leading to a lack of reliable understanding of ecological receptors. This area is characterised by a highly sensitive and biologically active marine system, yet the baseline data provided is incomplete. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of various species, resulting in an unreliable evidential basis for evaluating potential impacts.

A significant oversight in the assessment is the failure to properly recognise and evaluate the presence of otters, a European Protected Species. The application does not account for their active use of coastal areas for foraging and movement, neglecting to consider their core foraging range and behavioural patterns. Consequently, the potential impacts of construction disturbance, noise, and increased activity on this species have not been sufficiently assessed, undermining any conclusions regarding the absence of significant effects.

The assessment of basking sharks also exhibits serious deficiencies, primarily due to a reliance on aerial surveys, which introduces substantial detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that show frequent use of these waters. The failure to incorporate or properly consider such data leads to an incomplete baseline and compromises the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the true scale of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to comply with the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not adequately identify or assess protected species. The level of uncertainty generated prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment accompanying the application presents significant deficiencies, characterised by evidence gaps and internal contradictions that compromise its findings. The application overlooks the internationally important seabird populations found along the west coast of the Isle of Lewis, many of which are already experiencing declines. Furthermore, it fails to demonstrate, to the necessary evidential standard, that these species will not suffer adverse effects from the proposed development. Key foraging areas and migratory pathways have not been adequately evaluated, particularly regarding displacement, collision risk, and habitat loss.

There exists a critical inconsistency within the application itself, wherein the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case. Such a case is only warranted when significant harm is anticipated, raising serious doubts about the credibility of the assessment and suggesting that its conclusions lack the backing of substantial evidence. The assessment also falls short in showing that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling techniques introduces an element of uncertainty, particularly for species already in decline like Kittiwakes and Fulmars. The methodologies employed risk underestimating mortality, especially given the inadequacy of baseline data and the incomplete understanding of behavioural responses.

Moreover, the positioning of turbines within a recognised migratory corridor poses an additional significant risk, creating an obstacle in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor, as well as the potential effects on species with relatively small global populations, have not been sufficiently assessed by the application.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and limitations of modelling, signifies that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle and precludes a lawful determination in favour of consent. Additionally, the identified deficiencies reflect non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to establish that internationally important seabird populations will not face adverse impacts places the proposal at odds with national policy.

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and inadequate evidence. These shortcomings hinder a thorough evaluation of potential impacts and contribute to the conclusion that the application does not meet the statutory requirements essential for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application significantly neglects the assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas reveals a key shortcoming; these locations are active burial grounds and centres for spiritual practice, yet they are misrepresented as static features. This mischaracterisation disregards their ongoing significance and the impact

of development on their surroundings, leading to an incomplete understanding of cultural effects and overlooking their vital role in community life.

Moreover, the absence of an evaluation of intangible cultural heritage, including the Gaelic language and local traditions, compounds these deficiencies. The longstanding relationship between the community and the coastal environment is central to the area's identity but remains unaddressed in the assessment. Without an exploration of these crucial elements, it is impossible to grasp the full cultural implications of the proposed development.

Concerns regarding community rights and engagement are also paramount. The Gaelic-speaking population possesses a distinct 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 undermines the integrity of the assessment and neglects established principles of participation in decisions affecting cultural and environmental interests.

Furthermore, the procedural lapse is underscored by the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The failure to conduct this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, thus inhibiting a lawful determination.

From a policy standpoint, these oversights directly conflict with National Planning Framework 4, particularly in terms of the protection of historic assets and places. The failure to assess both tangible and intangible heritage, alongside the lack of recognition of living cultural practices, constitutes a clear deviation from policy expectations.

In summary, the failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not provide a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development lacks a complete assessment of social impacts, health, and wellbeing, which raises concerns regarding its transparency and legality. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks highlighted by the developer's own research.

Summaries available indicate that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are not speculative in nature. However, without access to the complete assessment, proper scrutiny of these findings is not possible,

limiting the ability to ascertain their significance in the decision-making process.

Furthermore, evidence suggests that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" identified in the developer's findings. Despite this, these social impacts have not been fully integrated into the main application or assigned adequate weight. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. An understanding of social, economic, and health impacts is vital for developments of this nature, especially when community character and functioning could be affected. The absence of the complete dataset means that the application does not provide a comprehensive evidential basis for evaluating the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development should support positive health outcomes and mitigate harm, yet existing evidence points to adverse effects that remain undisclosed. Without the full assessment, it is not possible to establish compliance with this policy.

The procedural consequences are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This constitutes a material omission within the application and represents a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the conclusion that the application is inadequately supported by necessary information.

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 of construction and pollution risks associated with the proposal is notably deficient and lacks the necessary detail to evaluate potential environmental effects adequately. The initiative necessitates significant seabed preparation and installation work in a high-energy Atlantic setting, yet it does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application is predicated on the future preparation of mitigation and contingency measures post-consent, thereby obstructing any meaningful assessment of their potential adequacy or effectiveness.

This reliance on unspecified future measures is particularly troubling given the sensitivity of the environment receiving these works. The West Lewis coastline is known for its clean coastal waters and critical habitats, which are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as the mobilisation of sediments and the possibility of accidental chemical or oil spills, it fails to offer sufficient details on the strategies for preventing, controlling, or monitoring

these risks.

Moreover, there exists uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to the potential effects on marine species and habitats that have already been recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By deferring the development of contingency plans until after consent has been granted, the application hinders an evaluation of whether adequate safeguards are in place to manage pollution incidents. This introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures at the point of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is required that likely significant effects and mitigation strategies be evaluated prior to granting consent. The absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of comprehensive management plans, and the uncertainty regarding potential impacts render the assessment materially inadequate. These deficiencies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life presented in the application is inadequate and lacks a thorough assessment of both ecological and socio-economic impacts. Specifically, the waters off the West Lewis coast host a rich marine ecosystem alongside a functioning fishing industry, yet the application fails to adequately safeguard these critical uses and habitats from potential significant disruption.

A notable concern arises from the presumption that fishing activities can simply be relocated without repercussions. The application does not provide any substantiated evidence that alternative fishing grounds are either available, accessible, or able to accommodate increased pressure. This significant gap raises the risk of overfishing in other areas and may lead to broader economic consequences for the local fishing fleet. In the absence of a well-supported evaluation, the implications for fisheries and livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The anticipated high-

energy hammer piling over an extended timeframe is expected to cause disturbances over extensive distances, impacting species such as dolphins. Concerns arise from the predicted disruption to a substantial portion of the local bottlenose dolphin population, yet the application inadequately addresses the significance of these effects, lacking sufficient supporting evidence.

Additionally, the application reveals a contradictory stance regarding the need for licences to permit harm to European Protected Species, while simultaneously characterising such impacts as negligible. This inconsistency casts doubt on the reliability of the assessment and raises issues of compliance with the Habitats Regulations, particularly when harm is expected to a level that necessitates legal authorisation.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the proposed development can operate alongside existing marine users or avoid unacceptable impacts on marine biodiversity, obstructing any conclusion that the proposal constitutes sustainable development.

In summary, the insufficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions significantly compromise the credibility of the assessment. These shortcomings hinder a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a thorough assessment of the onshore infrastructure, which is essential for understanding the full impacts of what constitutes a single integrated project. The offshore turbines and onshore works are interconnected; however, they are evaluated independently, leading to a disjointed approach that obscures the real scale of environmental and socio-economic consequences.

Key onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure traversing sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, poses a threat to this significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment means the project's overall environmental footprint cannot be fully understood.

By deferring the evaluation of onshore impacts, the application hampers the proper analysis of cumulative effects. The Environmental Impact Assessment process

mandates a holistic consideration of all project components, yet the fragmented assessment of offshore and onshore elements obscures the combined impacts on peatlands, habitats, and local communities.

Moreover, sensitive habitats, such as machair systems and peatland environments, are at risk and are afforded policy protection. The application does not convincingly demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, highlighting a significant evidential gap in biodiversity protection.

Concerns regarding carbon balance also arise. Disturbing peatland releases stored carbon, potentially generating a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this concern or fails to show that the overall carbon balance remains favourable.

Additionally, routing infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. The application does not provide evidence that 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 cohesive whole and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

Moreover, the application neglects to assess the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased risks of collision. The absence of a lighting impact assessment or phototaxis study means that the application does not consider how

aviation lighting may negatively affect these species or contribute to increased mortality.

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

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

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

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its scenery. However, it does not provide a quantified assessment of how the proposed large-scale offshore infrastructure would impact visitor numbers, behaviour, or the overall economic contribution of tourism. This is particularly concerning given that tourism has grown significantly, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. The lack of analysis regarding how the industrialisation of the seascape and the potential loss of environmental quality would affect Tourism Gross Value Added and the wider economic resilience is alarming. Without such a thorough examination, it remains unclear whether this development would yield a net economic benefit or jeopardise an already established and expanding sector.

Moreover, the assessment neglects to consider the critical role of environmental quality in sustaining tourism. The unspoiled landscapes and dark skies are essential for enhancing visitor experience and fostering emerging markets, such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this issue, creating a considerable void in understanding the potential impacts on a recognised and burgeoning part of the local economy.

In an island community with limited economic diversification, the failure to evaluate the

impacts on tourism raises significant concerns regarding employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been addressed as mandated by the Islands (Scotland) Act 2018.

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

Collectively, the deficiencies in quantifying tourism impacts, evaluating the environmental factors influencing visitor behaviour, and acknowledging the island's economic dependency culminate in a substantial evidential gap. This significantly undermines the ability to conduct a robust evaluation of the economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exhibits serious deficiencies that compromise its compliance with sustainable development criteria as mandated by statutory duties, national policy, and evidential standards. Similar issues that led to the rejection of the Lewis Wind Power proposal in 2008 are apparent, as the current application presents a level of industrialisation that remains unacceptable despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis necessary for a sound determination of the application. The use of an undefined design envelope is problematic, and there is a lack of specified mitigation measures. Furthermore, the application omits critical impact pathways, particularly concerning nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Procedural shortcomings are also evident, notably the absence of a compliant Island Communities Impact Assessment, which contravenes statutory requirements set forth in the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment is a material omission that inhibits the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural places, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. The absence of tourism impact modelling fails to provide evidence of any net economic benefit. Moreover, there has been insufficient assessment of the cumulative impact

from both offshore and onshore elements, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surround environmental risks, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. This lack of thorough investigation, and instances of internal inconsistency, do not meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, thereby hindering the capacity to lawfully conclude that impacts are acceptable.

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

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

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

Additional Comments

It saddens me that the natural beauty of our island will be ruined by N4. It will detract tourism, and local communities and businesses will suffer as a result of this. Being one of very few places in the UK left very much untouched, it would be a shame to ruin the landscape and harm our wildlife with huge wind turbines.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 04DA5D41

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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.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a full, transparent, and reliable account of the potential environmental impacts of the proposed development. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This ambiguity compromises the integrity of the assessment and means that the impacts outlined may not accurately reflect those of the actual development, thus preventing both the public and the competent authority from grasping the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is sought on the basis that any environmental harm will be addressed later, which obstructs a meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of vital information to post-consent stages is procedurally unacceptable and undermines the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

There are also considerable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies create uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot satisfy statutory requirements.

As a result, 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, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it is not possible to show 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 existence of gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is materially inadequate and fails to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the application merely recounts the

project's evolution. This narrative approach does not adequately show that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

There is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the developer has not convincingly demonstrated that the possibility of placing turbines further offshore has been seriously considered, despite the likely reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the crucial role that proximity to shore plays in determining impact, highlights the significance of the missing analysis, which prevents any conclusion regarding whether the proposed siting is indeed the least damaging option.

These deficiencies extend to the evaluation of cable routing and landfall, where insufficient evidence is presented to show that alternative routes have been properly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis suggests that mitigation by design has not been effectively applied, relying instead on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly lacking, providing neither a complete nor a reliable understanding of ecological receptors within the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the baseline data is inadequate, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, this assessment does not deliver a sound evidential basis for assessing potential impacts.

A notable shortcoming is the assessment of otters, a European Protected Species. The application fails to properly acknowledge and evaluate their active use of coastal zones

for foraging and movement. The oversight of their core foraging range and behavioural patterns results in a failure to adequately assess the potential effects of construction disturbances, noise, and increased activity. This oversight undermines any conclusions regarding the absence of significant effects on the species.

Further concerns are raised regarding the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence. This is especially evident when compared to established land-based observations indicating frequent use of these waters. The omission of such critical data results in an incomplete baseline and further weakens the reliability of the conclusions drawn.

The methodological flaws highlighted mean that assertions of negligible or non-significant effects rely on assumptions rather than strong evidence. Additionally, the lack of adequate baseline data hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the actual level of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The 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 associated with this application is fundamentally flawed, particularly in its treatment of the West Lewis coastline, which must be recognised as a vibrant cultural landscape intertwined with environment, language, tradition, and community. Rather than appreciating heritage as a dynamic part of community life, the application reduces it to a collection of isolated, static features. This inadequate approach overlooks the ongoing social, cultural, and spiritual significance of these heritage elements.

Significantly, the evaluation of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, is deeply concerning. These sites serve as active locations for burial and spiritual practices, yet the assessment treats them as mere static features, neglecting their continued relevance and the implications of development on their settings. This mischaracterisation results in a flawed understanding of cultural effects and ignores their vital role in community existence.

Moreover, the assessment fails to acknowledge intangible aspects of cultural heritage, including the Gaelic language and local traditions, as well as the enduring relationship

between the community and the coastal environment. These factors are crucial to the area's identity but are entirely omitted from the evaluation, which severely limits the understanding of the development's cultural impact.

There are also serious issues regarding community rights and engagement. The Gaelic-speaking population, which holds a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and contradicts established principles that prioritise participation in decisions affecting cultural and environmental matters.

A significant procedural lapse is the failure to conduct a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. Without this necessary assessment, the responsible authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone raises concerns about the lawfulness of the determination.

From a policy standpoint, these issues create direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of historic sites and cultural places. The disregard for both tangible and intangible heritage, coupled with the failure to acknowledge living cultural practices, signifies a clear violation of policy standards.

Ultimately, the collective deficiencies in assessing living heritage, intangible cultural significance, community rights, and adherence to statutory requirements lead to a substantial evidential gap. The cultural repercussions of the proposed development remain unexamined, and the application fails to furnish an adequate foundation for gauging the true cultural cost associated with this proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the complete Social Impact Assessment is a significant oversight that undermines the entire evaluation process. While they conducted focus groups with local residents, the absence of the full report creates a critical evidential gap, which hampers both public understanding and the competent authority's ability to assess the social risks identified through the developer's research. This lack of transparency severely impairs the Environmental Impact Assessment, making it impossible to fully grasp the social, economic, and health implications of such a large-scale development.

Residents have already reported measurable levels of stress, anxiety, and concern linked to the proposal's size and proximity, illustrating the immediate impact on the community. These findings are grounded in direct engagement, not speculation, yet the incomplete disclosure of the assessment prevents thorough scrutiny and diminishes the importance of these impacts in the decision-making process.

Additionally, the proposal poses a perceived threat to community identity and cohesion, with indications of "cultural loss" present in the developer's findings.

Regrettably, these impacts have not been adequately reflected in the 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, leaving the application deficient in presenting a complete evidential basis to balance benefits against potential harm.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. It is essential that developments promote positive health outcomes and mitigate harm, yet the evidence available points to existing adverse effects that remain undisclosed. Without the complete assessment, it is impossible to demonstrate adherence to this policy.

The procedural implications of this deficiency are considerable. The competent authority is unable to perform a comprehensive socio-economic and health evaluation in the absence of the full Social Impact Assessment, representing a material omission within the application. Overall, the combination of the non-disclosure of this critical assessment and the evidence of existing adverse impacts results in an incomplete and unreliable evaluation. This not only prevents a lawful determination but also reinforces the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed application involves the introduction of large-scale turbines close to the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. This development would create a dominant industrial presence that would fundamentally alter the existing landscape, resulting in a permanent and irreversible transformation.

The assessment conducted fails to adequately represent the magnitude of the visual change that would occur. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The report does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in 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 concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been underestimated, compromising the assessment's reliability.

Additionally, there is a notable deficiency in addressing the interconnected relationship between seascape, landscape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape and are visually and spatially linked to the Atlantic horizon. However, the assessment treats these sites as isolated, failing to recognise their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural

significance.

The anticipated industrialisation of the seascape would sever these vital relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This not only represents a visual impact but also signifies broader cultural and spatial harm, which has not been sufficiently addressed in the application.

From a policy standpoint, this proposal contradicts National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the context of culturally significant sites. The absence of a thorough worst-case assessment further undermines any claim of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive to disturbance and contamination. The proposed development involves significant seabed preparation and installation works in a challenging Atlantic environment. However, the assessment of construction and pollution risks lacks the necessary detail to effectively evaluate potential environmental impacts. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included with the application. Instead, it relies on mitigation and contingency measures that will be developed after consent is granted, which undermines any meaningful assessment of their effectiveness or adequacy.

This reliance on unspecified future measures is particularly alarming given the fragile nature of the receiving environment. The application notes the risks associated with sediment mobilisation and accidental chemical or oil spills but fails to detail how these risks 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. Without reliable modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these potential impacts, including those on already identified sensitive marine species and habitats.

Moreover, the absence of well-defined emergency response procedures exacerbates

these issues. By postponing contingency planning until after consent is granted, the application hinders the evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risks and limits the ability of the competent authority to properly assess environmental protection measures before a decision is made.

From a regulatory standpoint, the failure to establish essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment framework. Significant effects and necessary mitigation must be evaluated before consent is granted, and the absence of such information prevents a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. Despite this, the application does not adequately address the potential ecological or socio-economic impacts, failing to ensure that these vital uses and habitats can be protected without significant disruption. A major concern is the unsubstantiated assumption that fishing activities can be displaced without negative consequences. The application lacks evidence to confirm that alternative fishing grounds are available and capable of supporting the increased pressure that such displacement would cause. This oversight is critical, as it raises the risk of overfishing in other areas and may lead to broader economic implications for the local fishing fleet. Without a detailed and evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, especially due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended period is likely to disturb marine life across considerable distances, notably affecting species like dolphins. The potential disruption to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays these risks, lacking the necessary supporting evidence to justify such minimisation.

There is also a troubling inconsistency within the application, as it acknowledges the need for licenses to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

Furthermore, the assessment does not adequately consider the cumulative impacts

resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is fundamentally inadequate, failing to encompass the full range of impacts arising from a singular integrated project. The offshore turbines and onshore works are interconnected, yet they are evaluated separately, resulting in a disjointed analysis that masks the true magnitude of environmental and socio-economic repercussions.

The onshore components entail cabling traversing protected moorland, the establishment of a substation near Stornoway, and the related access infrastructure within sensitive landscapes. These activities necessitate excavation through areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon reservoir and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thereby obstructing a complete understanding of the project's overall environmental footprint.

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

There are substantial risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not establish that the impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been implemented. This creates a notable evidential gap concerning biodiversity protection.

The proposal further raises critical concerns about carbon balance. The disruption of peatland releases sequestered carbon, potentially incurring a carbon debt that

undermines the aims of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains favourable.

Moreover, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal entitlements. The application fails to provide evidence that the requisite consents or processes have been initiated, leading to questions regarding both feasibility and lawful execution.

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

In summary, the disjunction of project components, the absence of a comprehensive assessment, and the deficiency of evidence relating to environmental and land use impacts render this portion of the application incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

Without a proper assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites might be adversely affected. The

evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

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

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

TOURISM

The evaluation of tourism impacts within the application is inadequate, neglecting to address the economic and social ramifications for a critical component of the Isle of Lewis economy. The island's tourism sector relies heavily on its scenic coastline, largely untouched landscapes, dark skies, and a sense of isolation. While the application notes that 86% of visitors are attracted by the scenery, it lacks a detailed quantitative analysis of how extensive offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution.

Tourism has experienced substantial growth, with revenue rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and representing up to 16% of the island's economy. Despite this progress, the application fails to explore how the potential industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added and the broader economic resilience. Without such an evaluation, it remains unclear if the development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the analysis does not consider the significance of environmental quality in bolstering tourism, particularly the value of pristine landscapes and dark skies for visitor experiences. This oversight, compounded by the absence of a Dark Skies Assessment, creates a notable gap in understanding the impact on an increasingly important segment of the local economy, including emerging markets like nature-based tourism and astro-tourism.

For an island community that exhibits limited economic diversification, the neglect of tourism impacts carries broader implications for employment, local enterprises, and the sustainability of the community. The failure to conduct a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been assessed in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not substantiate compliance with National Planning Framework 4, especially regarding economic impact and the

necessity to illustrate net benefit. Furthermore, it contradicts strategic objectives that designate tourism as a priority growth sector, lacking the necessary evidence for the competent authority to properly evaluate the economic ramifications of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental influences on visitor behaviour, and acknowledging the island's economic dependency create a significant evidential shortfall. This situation hinders a thorough appraisal of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm raises significant concerns regarding compliance with sustainable development principles, as mandated by statutory obligations, national policy, and evidential requirements. The application mirrors the fundamental issues that led to the previous rejection of the Lewis Wind Power proposal in 2008, highlighting the unacceptable scale of industrialisation. This current proposal is presented within a more robust policy environment that emphasises the importance of biodiversity, peatland conservation, landscape preservation, and community health.

There are substantial deficiencies within the application that undermine its evidential basis for determination. Specifically, the lack of comprehensive baseline data, the ongoing use of an undefined design envelope, and reliance on unspecified mitigation measures all contribute to a flawed assessment. Additionally, the failure to account for key impact pathways, such as effects on nocturnal wildlife, the full extent of onshore infrastructure, and potential impacts on tourism, renders the Environmental Impact Assessment incomplete. As a result, the likely significant effects and residual impacts remain poorly understood.

Furthermore, procedural inadequacies are evident in the application. The omission of a compliant Island Communities Impact Assessment breaches the statutory duty imposed by the Islands (Scotland) Act 2018. Additionally, the failure to provide the full Social Impact Assessment constitutes a material shortcoming. Such lapses inhibit the competent authority's ability to evaluate the implications for community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for consideration.

Conflicts with National Planning Framework 4 are clear, as the proposal fails to adequately protect biodiversity, natural environments, and cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of modelling related to tourism impacts. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to a lack of clarity regarding impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties persist regarding environmental risks, which could be significant.

Assessments pertaining to marine ecology, seabird populations, protected species, and marine mammals remain incomplete and occasionally contradictory. The evidential threshold necessary to eliminate the possibility of adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and hinders a lawful assessment of impact acceptability.

The proposal would bring about considerable and irreversible alterations to a notably sensitive landscape. The industrial development of the coastline facing the Atlantic, the erosion of dark skies, the disruption of cultural and visual connections, and adverse effects on tourism all signify permanent changes that cannot be adequately mitigated.

In conclusion, the application stands as both procedurally and substantively inadequate for determination. The extensive information gaps, coupled with conflicts with policy and unresolved environmental concerns, hinder the possibility of a lawful, evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke relevant regulatory provisions to demand the submission of necessary information.

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

Additional Comments

I am writing to express my absolute opposition to the proposed industrial-scale wind farms planned for the west coast of Lewis. Having lived/spent time on this coast, I believe this project is a catastrophic error that will irreversibly destroy the unique character of our island.

My opposition is rooted in the following profound concerns:

Destruction of Unspoiled Scenery: The west coast is defined by its raw, Atlantic beauty and vast horizons. Proposing 350-meter-plus turbines—taller than the Eiffel Tower—only 3–13 km from our shore is obscene. They will not be a "feature" in the distance; they will be an dominating industrial wall destroying the "wild land" quality of this landscape.

Heartbreak for the Community: As someone who calls this place home, I feel a deep sense of heartbreak. We live here because of the peace, the scenery, and the connection to nature. This development is not in harmony with our area; it is an industrial assault upon it.

Threat to Tourism and Local Economy: Everything we sell to visitors—the wild, untouched scenery, the beaches, the culture—will be ruined. If the view is dominated by churning turbines, the tourists will stop coming, destroying local businesses that depend on our pristine environment.

Ecological Desecration: The "green" label on this project is a farce. Installing this infrastructure, with attendant noise and light pollution, in a sensitive marine ecosystem is dangerous. We are risking damage to seabed health, sea mammals, and bird migration routes, all while sacrificing valuable peatland for onshore infrastructure.

Minimal Local Benefit: We see no real benefit to the islanders from this. It feels like our

home is being sold out to multinational energy companies and greedy landowners, while we get to live with the visual and noise pollution.

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: 3B07A16C

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is proposed to be located off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding its compatibility with statutory requirements, national policy, and the principles of sustainable development are deeply rooted in the scale, proximity, and design of the proposal.

The application is lacking a sufficient evidential foundation for a lawful determination. Key environmental data is absent, the baseline information provided is both limited and inconsistent, and critical elements of the proposal remain undefined. The reliance on a flexible design framework obscures the understanding of potential significant effects, while the dependence on unspecified mitigation measures renders their effectiveness unverifiable. Consequently, the documentation fails to facilitate a complete and informed understanding of the impacts on the environment, culture, or community, with assertions of negligible or non-significant effects lacking robust evidence.

There are substantial policy conflicts evident in the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of this proposal raises significant concerns, particularly regarding the positioning of large turbines in close proximity to the shoreline, which could adversely affect landscape capacity, visual dominance, and the environment. In light of the insufficient information provided, the reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance, it is clear that the application is incomplete and cannot sustain a lawful determination. Given these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to provide a transparent or reliable depiction of the potential environmental consequences 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. This lack of commitment prevents a consistent worst-case scenario analysis, ultimately undermining the integrity of the assessment. Consequently, the impacts presented may not accurately represent the actual development, leaving both the public and the competent authority unable to comprehend the true environmental effects.

Moreover, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed later hinders any meaningful evaluation of effectiveness or residual impacts. This postponement of essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established prior to the determination of the application.

There are also considerable evidential shortcomings, including incomplete baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects are presented without sufficient supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory obligations.

As a result, the application does not meet the evidential requirements outlined in the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly in relation to protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, specifically concerning biodiversity protection and environmental integrity, since it fails to show that impacts have been fully assessed or that appropriate safeguards are established.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation strategies, and the gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies preclude a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant inadequacies in its assessment of alternatives, failing to meet the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of

realistic alternatives based on environmental effects, it provides a narrative account of the project's evolution. This approach does not adequately demonstrate that less harmful options have been identified, assessed, and selected over more damaging ones.

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Notably, the developer has not shown that serious consideration has been given to positioning turbines further offshore, where visual, ecological, and coastal impacts could potentially be reduced. Given the sensitive nature of the West Lewis coastline and the critical importance of proximity to the shore in evaluating impact, the absence of such analysis means that it cannot be concluded that the proposed siting is the least damaging option.

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

As a consequence, the application fails to demonstrate that environmental harm has been minimised through considerations of site selection, layout, and infrastructure routing. 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 appropriate alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

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

One significant gap is the assessment of otters, which are a European Protected Species. The application does not sufficiently recognise or evaluate their active use of coastal areas for foraging and movement. The failure to consider their core foraging

range and behaviour means that the potential effects of construction disturbance, noise, and increased activity have not been thoroughly assessed. This undermines any conclusions regarding significant effects on this species.

There are also shortcomings in the evaluation of basking sharks. The reliance on aerial surveys creates a significant detection bias, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. The lack of consideration for such data results in an incomplete baseline and undermines the reliability of the conclusions.

These methodological shortcomings mean that conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of sufficient baseline data also hinders the meaningful assessment of cumulative and indirect impacts, such as seasonal variations and wider ecosystem interactions. This uncertainty clouds the true scale of risk to marine species and habitats.

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

In summary, the incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These deficiencies obstruct 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 west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment submitted as part of the application is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application does not adequately demonstrate that these species will not be adversely affected, particularly given that the development is located within key foraging areas and migratory pathways. The implications of displacement, collision risk, or habitat loss are not robustly evaluated, raising concerns regarding the potential impact on these populations.

A critical contradiction within the application arises from the developer's conclusion of no significant adverse effects, juxtaposed with the advancement of a Habitats Regulations derogation case, which is necessitated only where significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. Furthermore, the assessment fails to convincingly address the impact on seabirds

associated with protected sites, such as the Lewis Peatlands and St Kilda. The assessment does not fully account for the importance of these feeding grounds, and its reliance on modelling approaches introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and behavioural responses are not thoroughly understood.

The placement of turbines within a recognised migratory corridor significantly increases risk, effectively obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application lacks a sufficient assessment of the long-term implications of sustained mortality within this corridor, as well as the potential effects on species with relatively small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. Consequently, this engages the precautionary principle, preventing a lawful conclusion that would support consent.

These deficiencies also signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, the assessment's internal inconsistencies, methodological weaknesses, and insufficient evidence render it unreliable, hindering a comprehensive evaluation of impacts and leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity along the West Lewis coastline, which is a living cultural landscape where environment, language, tradition, and community are deeply interconnected. The application adopts a reductive perspective, treating heritage merely as isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

Notably, the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas is a key deficiency. These sites serve as active places of burial and spiritual practice; however, they are classified as static features in the assessment. This oversight neglects their continued use and the implications of development on their surroundings. As a result, the evaluation of cultural effects is incomplete, dismissing their vital role in community life.

Additionally, the assessment disregards intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are fundamental to the area's identity, yet

they are entirely overlooked, creating a significant gap in understanding the true cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds a unique cultural identity with characteristics recognized for Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to honour established principles of participation in matters affecting cultural and environmental interests.

A further critical procedural failure is the lack 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. This omission is enough to render the determination unlawful.

From a policy standpoint, the inadequacies in the application place it in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, and the neglect of living cultural practices, signifies a clear violation of policy requirements.

Ultimately, the collective failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development remain improperly assessed, and the application lacks a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is accompanied by a Social Impact Assessment commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap that hampers understanding of the social risks identified by the developer's own research. This lack of transparency is critical, as it prevents both the public and the competent authority from grasping the complete picture.

Available summaries suggest 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 rather than speculation. Nevertheless, the non-disclosure of the full assessment restricts proper scrutiny of these findings and inhibits the ability to assess their significance in the decision-making process.

There are indications that the proposal is seen as a direct threat to community identity and cohesion, with references to "cultural loss" emerging from the developer's own findings. Despite this, these impacts have not been thoroughly integrated into the main application or given adequate consideration. The withholding of 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, as a comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude. Particularly where community character and functioning may be influenced, the failure to provide the complete dataset results in an incomplete evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development must support positive health outcomes and avoid causing harm, yet the evidence available indicates that existing adverse effects have not been fully disclosed. Consequently, without the full assessment, compliance with this policy cannot be substantiated.

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

In summary, the failure to disclose the full Social Impact Assessment, along with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the proposal significantly underrepresents the scale of potential impacts on the seascape, landscape, and visual environment. The West Lewis coastline is characterised by its open Atlantic views, an undeveloped nature, and a profound sense of remoteness. The introduction of large turbines near the shoreline would result in an industrial presence that would fundamentally change this character and lead to an irreversible alteration of the landscape.

The application lacks a thorough representation of the magnitude of the expected visual change. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historical sites, and popular coastal locations. This would detrimentally affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the extent of this impact or its significance within such a sensitive landscape context.

Methodological flaws are present in how visual viewpoints were selected and presented. There is evidence suggesting that these viewpoints may not encompass the most sensitive receptors or worst-case scenarios, particularly in relation to key cultural heritage sites and significant landscapes. This raises concerns that the projected visual impact may be understated, thus compromising the reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly contravenes National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The scale of the proposed changes is incompatible with the requirements to maintain landscape character, visual amenity, and the settings of culturally significant sites. The lack of a solid worst-case assessment further diminishes any assertion of compliance with policy.

Furthermore, it is evident that the impacts identified cannot be effectively mitigated. Due to the size, height, and closeness of the turbines, their presence would be overwhelming and unavoidable. Consequently, the resulting changes would be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately depict the scale of potential impacts, the sensitivity of the receiving environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and underscore the conclusion that the proposal is not compatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The reliance on undefined future measures in the proposal raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to both sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on the methods for preventing, controlling, or monitoring these risks.

Moreover, the assessment of construction and pollution risks is notably incomplete, failing to provide the necessary details to evaluate the potential environmental effects adequately. The proposal entails substantial seabed preparation and installation works in a high-energy Atlantic environment; however, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be prepared after

consent, which hinders any meaningful assessment of their adequacy or effectiveness.

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

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is granted, the application prevents a thorough evaluation of whether appropriate safeguards are in place to address pollution events. This approach introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and mitigation measures must be assessed prior to consent; therefore, the absence of this information renders a lawful determination impossible. Additionally, the application fails to demonstrate adherence to policy requirements related to environmental protection and water quality.

In summary, the shortcomings resulting from the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. These issues obstruct a thorough evaluation of construction and pollution risks, further supporting 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. However, the assessment of fisheries and marine life provided in the application is inadequate, failing to deliver a comprehensive evaluation of ecological and socio-economic impacts. The application lacks evidence that fishing activities can be displaced without significant consequences, raising concerns about the potential for overfishing in alternative locations. This oversight is critical, as the absence of alternative fishing grounds that are accessible and capable of supporting increased pressure risks economic repercussions for the local fishing fleet.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended timeframe is likely to disturb marine life over large distances, specifically affecting species such as dolphins. The anticipated disturbance to a notable segment of the local bottlenose dolphin population is concerning, yet the application appears to downplay the significance of these potential impacts without adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore components of the project encompass cabling across protected moorland, construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These undertakings involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The assessment of these onshore impacts is materially incomplete, failing to deliver a comprehensive understanding of the project's overall environmental footprint.

Furthermore, the approach taken in the application results in a fragmented assessment, as the offshore turbines and onshore works are evaluated separately despite being intrinsically linked. This separation obscures the true scale of environmental and socio-economic effects, impeding a proper evaluation of cumulative impacts. The Environmental Impact Assessment process mandates that all components of a project are considered in tandem, yet the current application does not fulfil this requirement, leaving the combined impacts on peatlands, habitats, and communities inadequately understood.

There exist significant risks to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application fails to demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented, thereby creating an

evidential gap regarding biodiversity protection. Concerns are also raised about the project's carbon balance. Disturbance to peatland can release stored carbon, potentially leading to a carbon debt that contradicts the renewable energy objectives. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

Moreover, 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, casting doubt on its deliverability and lawful implementation. From a policy standpoint, the disjointed assessment of the project and the failure to adequately protect peatlands, habitats, and land use interests are inconsistent with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further undermines the integrity of the application.

Collectively, the separation of project components, the absence of a thorough assessment, and the lack of supporting 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 West Lewis coastline is known for its exceptionally dark skies, which play a vital role in defining the area's environmental quality, cultural identity, and tourism potential. However, the Environmental Impact Assessment lacks any evaluation of these dark skies and their significance. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, is set to create a continuous and intrusive "wall of light" effect across the western horizon. This change would significantly alter the night-time environment, yet the application fails to assess the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors.

The omission is particularly concerning given the rising importance of dark skies for the local identity and the emerging sector of astro-tourism. Furthermore, the proposal does not address the potential consequences for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. Without a lighting impact assessment or a study focused on phototaxis, the application does not adequately consider how the aviation lighting could affect these species or contribute to higher mortality rates.

This failure is exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks the nocturnal behaviours and associated risks of the wildlife. For instance, Kittiwakes may forage or migrate at night, making them susceptible to disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific data related to night-time activity creates a crucial gap in understanding the ecological impacts involved.

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

From a policy standpoint, these omissions are at odds with National Planning Framework 4, which emphasises the need to protect natural places and maintain environmental quality. Additionally, the lack of consideration for night-time character undermines the comprehensive assessment of landscape and seascape impacts.

In summary, the absence of any evaluation of dark skies and nocturnal wildlife represents a substantial evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete, failing to support a lawful determination.

TOURISM

The assessment of tourism impacts within the application is significantly lacking and does not adequately consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. The region's tourism is heavily reliant on its wild coastline, nearly untouched landscapes, dark skies, and a feeling of remoteness. Despite the application noting that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contribution.

Tourism in the area has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, and it supports more than 1,000 jobs, accounting for up to 16% of the island's economy. However, the application does not model the potential impacts on Tourism Gross Value Added or the broader economic resilience resulting from the industrialisation of the seascape and the degradation of environmental quality. Without such an analysis, it remains unclear whether the development would provide a net economic benefit or pose a threat to an established and growing sector.

Moreover, the assessment neglects to address the significance of environmental quality in fostering tourism, particularly the value of unspoiled landscapes and dark skies to visitor experiences, along with emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this shortcoming, leading to a considerable gap in the understanding of impacts on an acknowledged and expanding segment of the local economy.

In a community like this island, which has limited economic diversification, the failure to evaluate the impacts on tourism has broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been considered as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity of proving net benefit. Furthermore, it contradicts strategic objectives that recognise tourism as a key growth sector and fails to provide adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that drive visitor behaviour, and acknowledging the island's economic dependencies lead to a significant evidential gap. This undermines the ability to carry out a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development, as determined by statutory duties, national policy, and evidential standards. It mirrors the core issues of the 2008 Lewis Wind Power proposal refusal, where the degree of industrialisation was deemed unacceptable. This current application is presented within a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data undermine the evidential basis necessary for proper determination. The reliance on an undefined design envelope, unspecified mitigation measures, and the omission of key impact pathways, such as those related to nocturnal wildlife, full onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. This inadequacy obstructs a full understanding of the likely significant effects and residual impacts of the proposal.

There are also significant procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a comprehensive Social Impact Assessment represents a material omission. These deficiencies hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

In direct contradiction to National Planning Framework 4, the proposal does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been adequately assessed, which obscures potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty remains regarding environmental risks, with incomplete assessments

concerning marine ecology, seabirds, protected species, and marine mammals. The evidential threshold required to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

I believe that the Western Isles should be a national park, an area of extreme natural beauty and of importance to wildlife. You wouldn't put up turbines in the middle of Loch Lomond. This will be devastating to the islands, it has no real environmental benefits. It is a greenwashing scheme to line the pockets of foreign investors. The Scottish Government can't even provide the islands with a reliable ferry service and now it's most important asset will be defiled by white towers littering the seascape.

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: 92598F10

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 contains substantial deficiencies and does not deliver a comprehensive, clear, or dependable account of the potential environmental effects stemming from the proposal. A critical issue arises from the employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the consistent application of a worst-case scenario, ultimately undermining the assessment's integrity. Consequently, the impacts detailed may not accurately reflect the development ultimately built, thus obscuring the true extent of environmental effects from both the public and the competent authority.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions implies that environmental harm will be addressed at a later stage, which hinders any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and at odds with the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and their mitigations be clearly established before determination.

Additionally, there are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly in instances where conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not fulfil the evidential threshold needed under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including requirements related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that appropriate safeguards exist.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which does not align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, it presents a narrative of project evolution that

does not effectively demonstrate that less harmful options have been properly identified and assessed in favour of solutions that may be more damaging.

A clear lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, or design configurations is evident. Notably, the application does not show that the developer has thoroughly considered placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, this omission means that it cannot be established that the proposed siting is the least damaging option.

The inadequacies are further seen in the cable routing and landfall assessment, where there is little evidence that alternative routes have been adequately explored to 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 suggests that mitigation by design has not been utilised, relying instead on post-design measures.

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

From a policy standpoint, these deficiencies raise significant concerns regarding compliance with National Planning Framework 4, especially in terms of protecting natural spaces, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a substantial omission that reinforces the conclusion that the application has not undergone sufficient evaluation and cannot justify a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One major oversight pertains to otters, a European Protected Species. The application does not sufficiently acknowledge their active use of coastal areas for foraging and movement. The assessment neglects to consider their core foraging ranges and behavioural patterns, which means the possible effects of construction disturbances,

noise, and heightened activity have not been properly evaluated. This lack of attention undermines the findings concerning the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, containing significant gaps in evidence and inconsistencies that undermine its conclusions. This raises serious concerns, particularly given that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The application fails to meet the necessary evidential standard to demonstrate that these species will not be adversely affected. It is located within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

Moreover, a critical contradiction is present within the application itself. The developer asserts that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and highlights that the conclusions drawn are not substantiated by the evidence provided. Insufficient evidence is presented regarding the impact on seabirds associated with

protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches injects uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. There is a strong likelihood that the methodologies employed underestimate mortality, especially given that baseline data is lacking and behavioural responses remain poorly understood.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application fundamentally fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where language, community, tradition, and environment are deeply intertwined. Instead of recognising heritage as a living, evolving aspect of community life, the assessment reduces it to mere isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance.

A significant oversight in the assessment is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active sites of burial and spiritual practice, yet they are inaccurately characterised as static features. This mischaracterisation ignores their continued use and the profound impact that development may have on their surrounding environment, resulting in an incomplete evaluation of their cultural significance to the community.

Moreover, the assessment does not take into account intangible aspects of cultural heritage, including the Gaelic language and the traditions that have long connected the community to the coastal environment. These elements are integral to the area's

identity and their absence from the assessment is a significant flaw. Without acknowledging these vital factors, the true cultural impact of the proposed development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as Indigenous People, yet there has been no process of Free, Prior and Informed Consent initiated. This lack of meaningful engagement significantly undermines the legitimacy of the assessment, disregarding essential principles of participation in decisions that affect cultural and environmental interests.

The procedural shortcomings are compounded by the absence of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot adequately fulfil its legal responsibilities to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination regarding the application unlawful.

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

In summary, the combined failure to assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the proposed development remain unassessed, and the application does not provide a sufficient foundation for understanding the true cultural cost of this proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The Social Impact Assessment commissioned by the developer has not been published in its entirety, leading to a significant evidential gap. This lack of transparency not only hampers the public's understanding but also restricts the competent authority's ability to grasp the full extent of social risks identified through the developer's own research. Available summaries suggest that local residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, not speculation, yet the failure to disclose the complete assessment limits proper scrutiny of the findings and affects their significance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these adverse impacts have not been adequately incorporated into the main application or given the weight they deserve. By withholding the full Social Impact Assessment, the true human and social costs of the development remain obscured.

This situation undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is critical for developments of this nature, especially when community character and functionality may be at stake. The application falls short by not providing the full dataset needed for a thorough assessment of the balance between benefits and harm.

From a policy standpoint, there is a clear failure to comply with National Planning Framework 4 concerning health and wellbeing. Development projects must foster positive health outcomes and avoid causing harm. Nevertheless, the evidence available points to existing adverse effects that have not been fully disclosed, leaving compliance with this policy unproven.

The procedural implications are profound, as the competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of adverse effects already in place, renders the assessment incomplete and unreliable, which obstructs a lawful determination and affirms that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and the interconnectedness of landscape and cultural heritage is significantly lacking and does not sufficiently consider the sensitivity of the receiving environment. The proposed large-scale turbines near the West Lewis coastline would introduce a continuous industrial presence that would fundamentally alter the area's undeveloped character and open Atlantic horizon. This change would result in a permanent and irreversible transformation of the landscape.

Moreover, the application inadequately represents the extent of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the naturalness and sense of remoteness that define this region. The assessment fails to convey the true significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the selection and representation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This oversight poses a risk of underestimating the magnitude of visual impact, which undermines the assessment's reliability.

Additionally, there is a critical failure to evaluate the interconnected relationship among the landscape, seascape, and cultural heritage. Heritage sites, such as the Calanais Standing Stones and other Scheduled Monuments, are embedded in a broader landscape context that is visually and spatially linked to the Atlantic horizon.

The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete understanding of the impacts on their cultural significance and setting.

The proposed industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This issue transcends visual impact, presenting a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which prioritises the protection of natural places and historic assets. The proposed scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The absence of a thorough worst-case assessment further calls into question any assertions 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 anticipated change is fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, which are crucial for evaluating potential environmental effects. It involves extensive seabed preparation and installation work in a high-energy Atlantic environment, yet fails to provide comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures to be formulated after consent is granted, hindering any thorough assessment of their potential effectiveness or adequacy.

This reliance on unspecified future measures raises substantial concerns, particularly given 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 disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on strategies for prevention, control, or monitoring of these issues.

There is also significant uncertainty surrounding the scale and behaviour of sediment plumes that could result from seabed disruption and cable installation. Without thorough modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This

uncertainty extends to potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

Furthermore, the absence of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, 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 ability to assess environmental protection measures effectively at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be evaluated before consent can be granted, and without this crucial information, a lawful determination cannot be reached. The application also does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of well-defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These issues impede a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding its impact on local fisheries and marine ecosystems, as the assessment provided is incomplete and lacks a thorough examination of ecological and socio-economic effects. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these important habitats and activities will be safeguarded from potential disruptions.

One major flaw in the proposal is the assertion that fishing activities can be displaced without any repercussions. There is no evidence presented that alternative fishing grounds exist or that they can accommodate the additional pressure resulting from displacement. This critical omission poses a risk of overfishing in other areas and could have serious economic implications for local fishermen. Without a solid, evidence-based assessment, the effects on fisheries and local livelihoods remain uncertain.

Additionally, the proposal poses significant risks to marine species, particularly due to underwater noise created during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to cause disturbances that could affect marine life over large areas, notably impacting local bottlenose dolphins. The application appears to minimize the importance of these potential effects, lacking adequate supporting evidence for such claims.

Moreover, there is a troubling inconsistency in the assessment where the requirement

for licences to permit harm to European Protected Species is acknowledged, yet impacts are simultaneously claimed to be negligible. This contradiction undermines the reliability of the assessment and raises compliance issues with the Habitats Regulations, especially when potential harm is anticipated that necessitates legal authorisation.

The evaluation also neglects to take into account cumulative impacts resulting from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive assessment of these combined effects is essential to understanding the overall implications for marine ecosystems and the socio-economic landscape.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore infrastructure assessment is significantly inadequate and fails to take into account the comprehensive impacts resulting from a singular integrated project. The offshore turbines and onshore works are inherently connected, yet their separate assessments lead to a disjointed approach that conceals the true magnitude of environmental and socio-economic effects.

Among the onshore components are cabling across protected moorland, the construction of a substation located near Stornoway, and the necessary access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a crucial carbon store and ecologically significant habitat. The application lacks a thorough examination of these impacts, obstructing a full understanding of the project's overall environmental footprint.

By neglecting or postponing the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment procedure mandates that all project elements be considered collectively, yet the division between offshore and onshore components means that the combined impacts on peatlands, habitats, and communities are not thoroughly understood.

Moreover, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protections. The application

does not provide proof that impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been implemented. This results in a clear evidential gap concerning biodiversity protection.

The proposal further raises issues related to carbon balance, as the disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. This matter is not sufficiently addressed within the application, which does not demonstrate that the overall carbon balance is indeed beneficial.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application fails to present evidence that necessary consents or processes have been initiated, casting doubt on the deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital for the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, visible over long distances, would create a continuous and intrusive “wall of light” across the western horizon, fundamentally altering the night-time environment. This transformation represents a significant concern as the application fails to assess the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. Given the importance of dark skies for the area's identity and the growth of emerging sectors like astro-tourism, this omission is noteworthy.

Moreover, the application neglects to evaluate the potential impacts on nocturnal wildlife, a critical oversight. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, leading to disorientation and increased risk of collision. The absence of any lighting impact assessment or phototaxis study means that the proposal fails to consider how the aviation lighting may affect these species or contribute to higher mortality rates.

This lack of evaluation is exacerbated by the reliance on daytime survey data in the

ornithological assessment, which does not account for nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are at risk of disorientation due to artificial lighting, yet this danger remains unassessed. The failure to collect site-specific night-time data leaves a critical gap in understanding the ecological impacts involved.

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

From a policy standpoint, the lack of assessment contravenes National Planning Framework 4 concerning the protection of natural places and environmental quality. This also undermines the wider assessment of landscape and seascape impacts since the night-time character is an integral aspect of the environment.

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

TOURISM

The assessment of tourism impacts is insufficient and does not address the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by scenery, it fails to provide any quantitative analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

Tourism has seen considerable growth, increasing from £65 million in 2017 to more than £81.5 million, which supports over 1,000 jobs and represents up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and deterioration of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the area. Without such an analysis, it is impossible to ascertain whether the development would offer a net economic benefit or harm an established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experience and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the impacts on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the necessity to prove net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to assess the economic implications of the proposal.

Overall, the inability to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This hinders a thorough assessment of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application revisits the core problems that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Now, it is presented within a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis for this application. It lacks comprehensive baseline data and relies on an undefined design envelope. Furthermore, it is dependent on unspecified mitigation measures and fails to address critical impact pathways, including effects on nocturnal wildlife, the full extent of onshore infrastructure, and potential impacts on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the significant effects or residual impacts that may arise.

The application also exhibits serious procedural shortcomings. The absence of a compliant Island Communities Impact Assessment breaches the statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to provide the complete Social Impact Assessment constitutes a notable omission. These gaps inhibit the competent authority from fully evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In terms of national policy alignment, the proposal stands in direct conflict with the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Moreover, 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 impacts of both

offshore and onshore components have not been thoroughly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and could be significantly detrimental. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

This proposal would also lead to substantial and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and negative effects on tourism represent permanent changes that cannot be mitigated to an acceptable extent.

Considering all of these factors, 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 based on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A4D7CB4F

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. It is informed by a thorough review of the Environmental Impact Assessment Report and related documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. The scale and design of this proposal, along with its proximity to the shoreline, raise serious questions regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent, while significant aspects of the proposal remain undefined. The adoption of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

Moreover, there are evident and significant conflicts with policy. The proposal does not appear to comply with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not prove that it can fulfil national obligations to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies directly undermine the statutory tests necessary for consent and compromise the ability of the competent authority to deem the development acceptable within policy frameworks.

The unprecedented scale of the proposal in this area, with large turbines situated close to the shoreline, raises major concerns about landscape capacity, visual impact, and overall environmental implications. The combination of inadequate information, reliance on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy illustrates that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in the assessment of marine ecology and protected species, failing to provide a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its biological activity, yet the baseline data remains incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A critical shortcoming is the inadequate recognition and assessment of otters, a European Protected Species, which actively use coastal areas for foraging and movement. The application does not take into account their core foraging range or behavioural patterns, leading to an insufficient evaluation of the potential effects caused by construction disturbances, noise, and increased activity. This oversight compromises any conclusions drawn about the absence of significant effects on this species.

Similarly, the assessment of basking sharks is flawed due to the reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence when compared with established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate relevant data undermines the baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions regarding negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including variations across seasons and interactions within the wider ecosystem. This uncertainty raises concerns about the actual risk to marine species and habitats.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment conducted on the cultural heritage and community identity is significantly flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community intertwine. This

application adopts a simplified view, treating heritage as a collection of isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual relevance within the community.

A notable shortcoming is evident in the handling of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual engagement, yet the assessment categorises them merely as static features, overlooking their continued use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to an inadequate understanding of cultural effects and dismisses their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage, such as the Gaelic language, traditions, and the enduring bond 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 considerable gap. The cultural implications of the development cannot be fully grasped without considering these essential elements.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population, recognised for its distinct cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. The lack of meaningful engagement calls into question the credibility of the assessment and fails to align with established principles for participation in decisions that influence cultural and environmental matters.

Additionally, there is a critical procedural oversight in the failure to complete a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the relevant authority cannot meet its legal obligation to assess the social, cultural, and economic effects on the island community. This absence alone renders a lawful determination impossible.

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

In summary, the collective neglect to evaluate living heritage, intangible cultural value, community rights, and statutory duties creates a substantial evidential gap. The cultural consequences of the development have not been adequately examined, leaving the application without a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing is evident and raises serious concerns regarding the validity of the evaluation. The developer has commissioned a Social Impact Assessment that involved focus groups

with local residents, yet the full report remains unpublished. This absence of the complete report creates a significant evidential gap, preventing the public and the competent authority from gaining a comprehensive understanding of the social risks identified in the developer's own research.

There are indications that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been derived from direct engagement with the community and are therefore based on observable facts rather than speculation. However, the failure to disclose the full assessment hinders proper scrutiny of these findings, limiting the ability to assess their significance in the decision-making process.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application proposes the introduction of large-scale turbines in close proximity to the West Lewis coastline, an area characterised by an open Atlantic horizon, an

undeveloped character, and a strong sense of remoteness. This proposal would create a continuous and dominant industrial presence that fundamentally alters the existing character, leading to a permanent and irreversible transformation of the landscape. The assessment provided does not adequately represent the scale of this visual change, which would dominate views from residential areas, historic sites, and popular coastal locations. This would significantly impact visual amenity and diminish the defining qualities of naturalness and remoteness, yet the assessment fails to convey the true level of impact or its significance within such a sensitive landscape.

Concerns arise regarding the methodology used in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This suggests that the assessment may have understated the magnitude of visual impact, thereby undermining its reliability.

Moreover, the assessment does not properly consider the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, visually and spatially linked to the Atlantic horizon. Treating these heritage assets as isolated entities fails to acknowledge their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would sever these relationships, altering the context in which these heritage assets are experienced and disrupting their connection to the natural horizon. This represents a broader cultural and spatial harm that remains inadequately assessed in the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient, lacking the necessary detail to adequately evaluate the likely environmental impacts. The proposed development entails extensive seabed preparation and installation activities within a high-energy Atlantic environment. However, the application fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be formulated after consent, which inhibits a meaningful evaluation of their sufficiency or effectiveness.

This reliance on undefined measures is particularly alarming considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disruption and pollution. While the application acknowledges the risks associated with sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail regarding the prevention, control, or monitoring of these risks.

Furthermore, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without thorough modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to the possible effects on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether adequate safeguards are established to address pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot occur. Additionally, the application does not demonstrate adherence to policy requirements regarding environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of comprehensive management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These inadequacies hinder a robust evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding its impact on local fisheries and marine ecosystems, as the assessment provided is incomplete and lacks a thorough

examination of ecological and socio-economic effects. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these important habitats and activities will be safeguarded from potential disruptions.

One major flaw in the proposal is the assertion that fishing activities can be displaced without any repercussions. There is no evidence presented that alternative fishing grounds exist or that they can accommodate the additional pressure resulting from displacement. This critical omission poses a risk of overfishing in other areas and could have serious economic implications for local fishermen. Without a solid, evidence-based assessment, the effects on fisheries and local livelihoods remain uncertain.

Additionally, the proposal poses significant risks to marine species, particularly due to underwater noise created during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to cause disturbances that could affect marine life over large areas, notably impacting local bottlenose dolphins. The application appears to minimize the importance of these potential effects, lacking adequate supporting evidence for such claims.

Moreover, there is a troubling inconsistency in the assessment where the requirement for licences to permit harm to European Protected Species is acknowledged, yet impacts are simultaneously claimed to be negligible. This contradiction undermines the reliability of the assessment and raises compliance issues with the Habitats Regulations, especially when potential harm is anticipated that necessitates legal authorisation.

The evaluation also neglects to take into account cumulative impacts resulting from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive assessment of these combined effects is essential to understanding the overall implications for marine ecosystems and the socio-economic landscape.

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application render the assessment inadequate 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 any assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant oversight. The West Lewis coastline

is noted for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting that is visible over considerable distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This alteration would fundamentally change the night-time environment.

Furthermore, the application lacks a thorough examination of how this lighting may affect visual amenity, landscape character, and the experiences of both residents and visitors. Given the importance of dark skies to the identity of the region and to growing tourism sectors such as astro-tourism, this lack of assessment is particularly concerning. The failure to consider the impacts of lighting creates a notable gap in the overall landscape and environmental evaluation.

Of equal concern is the lack of evaluation regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic behaviour, which can lead to disorientation and a heightened risk of collision. The application does not provide any lighting impact assessment or phototaxis study, thus failing to analyse how the proposed aviation lighting might impact these species or increase mortality rates.

This omission is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. Kittiwakes, for instance, may forage or migrate at night and are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data creates a critical shortfall 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 necessary to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural environments and environmental quality. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is a crucial aspect of the overall ecosystem.

In summary, the lack of any evaluation of 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 unable to support a lawful determination.

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its scenery. However, it does not provide any quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism. This is particularly concerning given that tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy.

Furthermore, the assessment overlooks the critical role of environmental quality in sustaining tourism, such as the significance of unspoiled landscapes and dark skies for visitor experiences. Emerging markets like nature-based tourism and astro-tourism rely heavily on these attributes. The failure to include a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the impacts on a recognised and expanding sector of the local economy.

In an island community where economic diversification is limited, the lack of assessment regarding tourism impacts 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 associated with tourism have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

Overall, the combination of not quantifying tourism impacts, neglecting environmental drivers of visitor behaviour, and disregarding the island's economic dependency leads to a significant evidential gap. This absence of thorough analysis hinders a robust evaluation of economic effects and suggests that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria for sustainable development when evaluated against statutory obligations, national policies, and evidential standards. This application echoes 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 submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains insufficient.

The application lacks a comprehensive and reliable evidential foundation for decision-making. Significant gaps in baseline data persist, accompanied by the use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of critical impact pathways such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism effects. Consequently, the Environmental

Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has not been adequately conducted, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties and potential risks to the environment. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The magnitude of information deficiencies, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority must either refuse consent on these bases or invoke the relevant regulatory provisions to compel the submission of the necessary missing information.

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

Additional Comments

This scale of development will have a permanent effect on the population, wildlife, ecology, health and wellbeing and tourism of our islands with no direct tangible benefits.

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: EB56D749

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

Dear Sir/Madam

This letter constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. There are significant concerns about the scale, proximity, and design of the proposal in relation to its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide an adequate evidential basis for a lawful determination. There is a lack of critical environmental data, and the baseline information presented is limited and inconsistent. Key aspects of the proposal remain undefined, and the flexible design framework employed prevents a clear understanding of potential significant effects. Furthermore, reliance on unspecified mitigation measures means that their effectiveness cannot be assessed. Consequently, the documentation fails to offer a comprehensive or informed understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that national requirements to safeguard biodiversity, climate interests, and environmental integrity can be satisfied. These discrepancies directly undermine the statutory tests required for consent and compromise the ability of the competent authority to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact, particularly with large turbines positioned in close proximity to the shoreline. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, clear, or credible account of the anticipated environmental effects associated with the proposal. One significant issue is the introduction of a flexible

Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This element creates substantial uncertainty and hinders the application of a consistent worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts outlined may not accurately represent the development that will ultimately be constructed, leaving both the public and the competent authority without a true understanding of the environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. The request for consent is predicated on the assumption that any environmental harm will be addressed subsequently, which obstructs any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contravenes the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly delineated prior to determination.

Additional evidential deficiencies are present, notably gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings result in uncertainty regarding the magnitude and significance of the impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information precludes a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory obligations.

As a result of these issues, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to meet the requirements related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that adequate safeguards are in place.

In conclusion, the combination of reliance on an undefined design envelope, lack of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects, meaning that the competent authority cannot justifiably determine the application based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, resulting in a lack of a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is recognised as a highly sensitive

and biologically active marine system, yet the methodologies employed and the baseline data provided are insufficient to capture the presence, behaviour, and habitat use of the relevant species. Consequently, the assessment fails to establish a solid evidential basis for evaluating potential impacts.

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposed development lacks adequate consideration of the West Lewis coastline as a vibrant cultural landscape, where environment, language,

tradition, and community are interwoven. This application adopts an overly simplistic view, treating heritage merely as isolated assets rather than recognising their ongoing social, cultural, and spiritual relevance within the community.

A significant shortcoming is evident in the evaluation of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet they are mischaracterised as static features. This oversight neglects their continued use and meaning, as well as the potential impact of development on their surroundings. Consequently, the assessment provides an incomplete picture of the cultural implications, disregarding the cemeteries' vital role in community life.

Moreover, the evaluation fails to address intangible cultural heritage elements, such as the Gaelic language and traditions, along with the enduring relationship between the community and the coastal environment. These aspects are crucial to the area's identity, yet they are conspicuously missing from the assessment, representing a serious oversight. Without acknowledging these factors, the development's cultural impact remains inadequately understood.

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

A significant procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to examine the social, cultural, and economic effects on the island community, rendering any determination unlawful.

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

In summary, the failure to adequately evaluate living heritage, intangible cultural significance, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the proposed development have not been properly assessed, leaving the application without a solid foundation for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines would be situated in close proximity to the shoreline, introducing a continuous industrial presence that would fundamentally alter this character. This change would result in a permanent and irreversible transformation of the landscape.

The application fails to properly assess 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 diminishing the natural and remote qualities of the area. The assessment does not adequately convey the significance of these impacts on such a sensitive landscape.

There are also concerns regarding the methods used to select and present visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This may lead to an understatement of the visual impact, calling into question the reliability of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these assets as isolated, the assessment fails to recognise their interdependence, resulting in an incomplete evaluation of their cultural significance and setting.

The proposed industrialisation of the seascape would sever these vital connections, altering how heritage assets are experienced and disrupting their relationship with the natural horizon. This would not only create a visual impact but also a broader cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change proposed is incompatible with safeguarding the landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any claims of policy compliance.

Additionally, the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. This change is fundamental and permanent, and cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately reflect the scale of the impact, the sensitivity of the environment, or the interconnectedness 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 lacks adequate assessment regarding construction and pollution risks, failing to provide sufficient detail necessary for evaluating potential environmental effects. Significant seabed preparation and installation works are planned within the high-energy Atlantic environment, yet the application does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be developed after consent, which hampers any meaningful assessment of their effectiveness or adequacy.

This reliance on unspecified future measures is particularly alarming, considering the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and vital habitats, which are susceptible to sediment disturbance and contamination. Although the application recognises risks like sediment mobilisation and accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, controlled, or monitored.

Furthermore, there is significant uncertainty surrounding the scale and behaviour of sediment plumes that could result from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological implications of these impacts. This uncertainty also extends to potential effects on marine species and habitats, which have been identified as sensitive within the broader assessment.

Compounding these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to tackle pollution incidents. This situation introduces procedural risk and undermines the capacity of the competent authority to properly assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are assessed prior to consent, and the absence of such critical information renders a lawful determination impossible. The application also fails to demonstrate adherence to policy requirements regarding environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment fundamentally deficient. These inadequacies hinder a thorough evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life within the application lacks comprehensiveness, resulting in an inadequate analysis of both ecological and socio-

economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem alongside an active fishing industry, yet the proposal does not convincingly show that these essential habitats and activities can be preserved or sustained without substantial disruption.

A significant concern arises from the assumption that fishing activities can be relocated without repercussions. There is a notable absence of evidence regarding the availability or accessibility of alternative fishing grounds capable of accommodating any additional pressure. This gap is critical, as displacement could lead to overfishing in other areas, potentially resulting in severe economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, it becomes impossible to fully grasp the implications for fisheries and local livelihoods.

Moreover, the proposed development presents considerable threats to marine species, particularly due to the underwater noise generated by construction activities. The prolonged use of high-energy hammer piling is anticipated to create disturbances over extensive distances, adversely affecting species such as dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application diminishes the seriousness of these effects, lacking adequate evidence to support such claims.

There is also an evident contradiction in the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously asserting that these impacts are negligible. This inconsistency undermines the credibility of the assessment and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm is at a level necessitating legal approval.

Additionally, the assessment does not adequately consider cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A thorough evaluation of these interconnected effects is essential for determining the overall consequences for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short in demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which hinders any conclusion regarding its sustainability.

In summary, the combination of insufficient evidence concerning fishing displacement, an underestimation of acoustic effects, and internal inconsistencies collectively 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 application presents a proposal that includes significant onshore infrastructure, which is fundamentally interconnected with offshore elements. However, the assessment provided is materially incomplete and fails to consider the full range of impacts associated with this single integrated project. The separation of the assessment for offshore turbines and onshore works results in a fragmented approach, obscuring the true scale of both environmental and socio-economic effects.

The onshore infrastructure involves cabling across protected moorland, the construction of a substation near Stornoway, and associated access routes through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. As the application lacks a comprehensive assessment of these impacts, it prevents a full understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all components of a project must be considered in tandem. The current separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain insufficiently understood.

Furthermore, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not establish that impacts on these habitats have been fully assessed or that effective avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

The proposal also raises pertinent concerns regarding carbon balance. The disturbance of peatland is likely to release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not adequately address this issue or provide evidence that the overall carbon balance is maintained as beneficial.

Additionally, the routing of infrastructure through active croft land creates possible conflicts with existing land use and legal rights. There is no evidence presented that indicates the necessary consents or processes have been initiated, casting doubt on the deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to assess the impact of aviation lighting on nocturnal wildlife and dark skies, which are critical to the area's environmental quality and tourism. The West Lewis coastline is known for its exceptionally dark skies, an important aspect of both cultural identity and tourism value. The introduction of permanent red aviation lighting will create a noticeable "wall of light" effect across the western horizon, significantly altering the night-time environment.

Visual amenity, landscape character, and the experiences of residents and visitors have not been evaluated in relation to this lighting. The lack of consideration is particularly concerning because dark skies are vital to the area's identity and the developing sector of astro-tourism. This oversight creates a notable gap in the environmental impact assessment.

Furthermore, there is no evaluation of the effects of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not include any lighting impact assessment or phototaxis study, which means it does not evaluate how this lighting could affect these species or increase their mortality rates.

The ornithological assessment relies solely on daytime survey data, failing to capture nocturnal activity or the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been considered. The absence of site-specific night-time data creates a crucial gap in understanding ecological impacts.

Without an assessment of nocturnal effects, it is impossible to determine whether protected species or designated sites could be adversely affected. The required standard of evidence to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and obstructing a lawful determination.

From a policy viewpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of the night-time environment is integral to the overall ecosystem.

Overall, the lack of any evaluation of dark skies and nocturnal wildlife presents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and cannot support a lawful determination.

TOURISM

The assessment of tourism impacts within the application is fundamentally lacking and does not adequately address the economic and social implications for a vital sector of

the Isle of Lewis's economy. Tourism relies heavily on the region's natural attributes, including its wild coastline, near-pristine landscapes, dark skies, and the sense of remoteness that attracts visitors. While it is stated that 86% of tourists are drawn to the area for its scenery, the application fails to provide a quantifiable analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Tourism has seen considerable growth, 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 does not evaluate how the potential industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. Without this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or instead jeopardise this established and expanding sector.

Furthermore, the assessment neglects to examine the significance of environmental quality in enhancing tourism. The unspoiled landscapes and dark skies are crucial to the visitor experience and are increasingly important in emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this oversight, creating a major gap in understanding the potential effects on a recognised and expanding component of the local economy.

In an island community that suffers from limited economic diversification, the neglect to assess tourism impacts extends to broader implications for employment, local enterprises, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, as mandated under the Islands (Scotland) Act 2018, have not been thoroughly evaluated.

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

In summary, the deficiencies in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and recognising the island's economic dependencies lead to a significant evidential void. This hinders a comprehensive assessment of economic repercussions and supports the assertion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as dictated by statutory duties, national policy, and evidential requirements. The issues inherent in this proposal mirror those that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This current

application is submitted under an enhanced policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it fails to address these critical elements.

There are substantial deficiencies in the evidential basis provided for this determination. The application lacks comprehensive baseline data, relies on an ill-defined design envelope, and incorporates unspecified mitigation measures. Moreover, it fails to address essential impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, which hinders a thorough understanding of likely significant effects and residual impacts.

Procedural inadequacies are also evident, particularly the absence of a compliant Island Communities Impact Assessment, which constitutes a breach of the statutory duty established under the Islands (Scotland) Act 2018. Furthermore, the failure to provide a complete Social Impact Assessment is a material omission. These shortcomings obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

The proposal is in clear conflict with National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Additionally, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The assessment of the cumulative impacts of both offshore and onshore components has not been adequately addressed, thus obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project are uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential standard necessary to conclude that adverse effects can be excluded beyond reasonable scientific doubt has not been met, which invokes the precautionary principle and obstructs a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal is poised to induce substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the impacts on tourism all represent enduring effects that cannot be adequately mitigated.

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

For these reasons, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be refused in its entirety.

Additional Comments

As someone who has visited Lewis for many years to visit friends and family who call the island home, the thought of the sheer expanse of the development will be detrimental to the long term future of the island.

The infrastructure alone without even taking into account the size of the towers will wreak havoc on the landscape in the long term.

The size of the various compounds and plant needed to run and maintain the towers alone will be a scar on the landscape of Lewis.

There will be practically nowhere on the island there will not be a visual impact.

The idea of maintenance boats trying to work on these towers on the west coast of the island in anything other than summer weather is laughable and completely impractical to anyone that has any knowledge of how hard the seas off the Hebrides can be.

Having heard friends whose families have lived for generations on the island talk genuinely about thinking of moving away from Lewis due to the impact this project will have is another fine example of how this is not a suitable long term project for the island.

In a location such as the Hebrides where an aging population and the inability to keep so many young people and families on the islands in general, don't make it less likely for people to want to stay or move there other than for shorter term work on the project.

The fact the project has even got as far as it has unfortunately has cronyism and conflicts of interest from various planning and consulting parties written all over it.

The recent polls suggesting around 80% of islanders don't want the wind farm is reason enough to consider stopping this going forward.

There is a place for wind farms and I have worked on several in my career. I have no fundamental issue with them but this planning is absolute crazy, I pass them regularly on travel to work close to my house, have no issue with them being on hills that I can see from my windows.

This isn't a gut hatred of wind farms but a response of being astounded that this particular project has got as far as it has.

Please for the sake of the island as it is, the future generations and the island as a landscape in its own right in the future, stop this project.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: DCEBBE9F

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

Dear Sir/Madam

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

A review of the Environmental Impact Assessment Report reveals that the application lacks an adequate evidential basis for a lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a comprehensive understanding of the likely significant effects. The use of a flexible design framework complicates this further, as the reliance on unspecified mitigation measures raises questions about their effectiveness. Consequently, the documentation fails to facilitate a full or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

There are clear policy conflicts evident within the proposal, as it appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. These conflicts particularly relate to biodiversity, natural places, cultural heritage, and health and wellbeing, failing to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such inconsistencies directly affect the statutory tests required for consent, compromising the ability of the competent authority to assess the development's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, offering an incomplete picture of the ecological receptors in the West Lewis coastal environment. This marine system is both highly sensitive and biologically active, yet the baseline data presented is inadequate, and the methodologies employed fail to effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not furnish a reliable evidential basis for evaluating potential impacts.

A significant gap in this assessment concerns otters, a European Protected Species, as it neglects to appropriately recognise and evaluate their active usage of coastal regions for foraging and movement. The lack of attention to their core foraging range and behavioural patterns leads to an insufficient assessment of the potential impacts of construction disturbances, noise, and increased activity, ultimately undermining any claims regarding the absence of significant effects on this species.

Further shortcomings are apparent in the evaluation of basking sharks, where the reliance on aerial surveys introduces notable detection bias, particularly in Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate frequent activity in these waters. The failure to incorporate or adequately consider this data results in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

These methodological shortcomings mean that any conclusions regarding negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of sufficient baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and interactions within the broader ecosystem. This leads to uncertainty regarding the true extent 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 it fails to properly identify or assess protected species. The level of uncertainty introduced is such that it precludes the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In these circumstances, consent cannot be granted lawfully.

In conclusion, the deficiencies in baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These issues prevent a thorough evaluation of the impacts on marine ecology and protected species, further underscoring that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. This development is located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. However, the application does not demonstrate to the required evidential standard that these species will not be adversely affected.

A fundamental contradiction exists within the application. The developer concludes there are no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary when significant harm is expected. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the underlying evidence.

The assessment fails to provide adequate evidence that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully acknowledged, and the reliance on

modelling approaches introduces uncertainty, particularly for species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in cases where baseline data is incomplete and behavioural responses are not thoroughly understood.

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

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

The identified deficiencies also represent non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected puts 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 conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development presents significant shortcomings in its assessment of cultural heritage and community identity, particularly regarding the West Lewis coastline, which should be viewed as a living cultural landscape intertwined with environment, language, tradition, and community. The application adopts a narrow perspective, treating heritage as disconnected, static elements rather than recognising their dynamic social, cultural, and spiritual roles in the community.

A notable oversight is the categorisation of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial and spiritual spaces, yet they are considered static features in the assessment. This approach neglects their ongoing use, significance, and the implications of development on their surroundings. Consequently, this mischaracterisation leads to an inadequate evaluation of cultural impacts and dismisses their importance in community life.

Furthermore, the assessment lacks attention to intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the

community and the coastal environment. These aspects are vital to the area's identity, yet they are wholly absent from the evaluation, resulting in a substantial omission. The absence of these considerations hinders a comprehensive understanding of the cultural impact associated with the development.

Concerns also arise regarding community rights and participation. The Gaelic-speaking community, which embodies characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles of community participation in matters that affect cultural and environmental interests.

Moreover, there is a critical procedural failure due to the omission 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 fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

These deficiencies also conflict with policy frameworks, particularly National Planning Framework 4, which emphasises the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge ongoing cultural practices signifies a clear deviation from policy requirements.

Collectively, the neglect to assess living heritage, intangible cultural values, community rights, and compliance with statutory obligations results in a substantial evidential gap. The cultural impacts of the proposed development have not been adequately addressed, and the application does not furnish a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, remains unpublished in its entirety. This lack of transparency signifies a considerable evidential gap, impeding both public and competent authority understanding of the social risks identified through the developer's own investigation.

Available summaries reveal that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore factual rather than speculative. However, the withholding of the complete assessment limits proper scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet, these social impacts have not been adequately incorporated into the

main application or given the necessary weight. The lack of access to the full Social Impact Assessment obscures the true human and social cost associated with the development.

This absence of transparency fundamentally undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functionality may be compromised. The failure to provide the complete dataset means that the application does not offer a comprehensive evidential basis for weighing the benefits against the harms.

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

The procedural consequences are considerable. The competent authority cannot perform a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant omission within the application and indicates a failure to fulfil the evidential requirements outlined in the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, in conjunction with evidence of existing adverse effects, renders the assessment insufficient and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks adequate information to support it.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of 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 application lacks the necessary detail to properly assess construction and pollution risks, rendering the environmental evaluation fundamentally inadequate. It involves extensive seabed preparation and installation within a challenging Atlantic environment, yet fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified future mitigation and contingency measures, which hinders any meaningful assessment of their effectiveness or sufficiency.

This dependence on vague future strategies is particularly alarming given the sensitivity

of the West Lewis coastline, which is home to clean coastal waters and significant habitats susceptible to sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail how these will be prevented, monitored, or controlled.

There is significant uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on already identified sensitive marine species and habitats.

Moreover, the lack of thorough emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application precludes evaluation of whether suitable safeguards are in place for responding to pollution incidents. This introduces procedural risk and diminishes the ability of the competent authority to assess environmental protection measures adequately at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the Environmental Impact Assessment requirements. The assessment of likely significant effects and mitigation should occur prior to granting consent; without this critical information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These flaws hinder a comprehensive evaluation of construction and pollution risks, further reinforcing the position 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 comprehensive evaluation of both ecological and socio-economic factors. The waters off the West Lewis coast are home to a diverse marine ecosystem and a vital fishing industry, yet the proposal does not adequately protect or maintain these essential uses and habitats from significant disruption.

One major concern is the unfounded assumption that fishing activity can be relocated without adverse effects. The application does not offer any proof that alternative fishing grounds exist, are accessible, or can sustain additional pressure. This critical oversight raises the risk of overfishing in other areas, which could have broader economic repercussions for the local fishing fleet. Without a solid, evidence-based assessment, it is impossible to fully understand the potential impacts on fisheries and local livelihoods.

The proposal further jeopardises marine species, especially due to the underwater noise associated with construction activities. Prolonged high-energy hammer piling is expected to disturb marine life over considerable distances, particularly impacting species like dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is concerning; however, the application downplays these effects, lacking adequate supporting evidence.

Additionally, there is an apparent contradiction within the application, acknowledging that licences are required to permit harm to European Protected Species while simultaneously claiming that impacts are negligible. This inconsistency calls into question the reliability of the assessment and raises alarm about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to account for cumulative impacts from multiple stressors, including habitat disturbance, noise pollution, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating adherence to the National Planning Framework 4 and the National Marine Plan. It does not illustrate how the development can coexist with existing marine users or avoid unacceptable harm to marine biodiversity, thus precluding any assertions that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The offshore turbines and onshore works are part of a single integrated project that must be considered together. However, the assessment of onshore infrastructure remains significantly incomplete, failing to address the full scope of impacts. This fragmented evaluation obscures the true extent of environmental and socio-economic effects associated with the project.

Onshore elements of the project involve substantial construction activities, including the installation of cabling across protected moorland and the construction of a substation near Stornoway, as well as the development of access routes through sensitive landscapes. These actions entail excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, resulting in an inadequate understanding of the overall environmental footprint of the project.

By failing to assess onshore impacts appropriately, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project should be examined collectively, yet the current separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities are not fully understood.

The proposal also poses significant risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The assessment does not sufficiently demonstrate that impacts on these habitats have been fully explored or that adequate avoidance measures have been implemented, resulting in a notable evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by this proposal. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that undermines the objectives of renewable energy initiatives. The application does not sufficiently address this critical issue or provide assurance that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application fails to offer evidence that the necessary consents or processes have been initiated, prompting questions about the deliverability and lawful implementation of the project.

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

In summary, the disjointed evaluation of project components, absence of a comprehensive impact assessment, and lack of supporting evidence regarding environmental and land use effects render this application incomplete and unreliable, ultimately hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The coastline of West Lewis is renowned for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed introduction of permanent red aviation lighting will be visible over extensive distances, resulting in a continuous and intrusive “wall of light” that will drastically change the night-time environment.

Furthermore, the proposal fails to consider how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is

particularly concerning given the importance of dark skies to the area's identity and the emerging sector of astro-tourism. Such a significant omission creates a clear deficiency in the overall landscape and environmental assessment.

Equally important is the lack of evaluation regarding the effects of this artificial lighting on nocturnal wildlife. Various species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, exhibit sensitivity to artificial light due to phototaxis, which can lead to disorientation and a heightened risk of collisions. The application does not feature a lighting impact assessment or a phototaxis study, meaning that the potential effects of aviation lighting on these species or the likelihood of increased mortality have not been evaluated.

This concern is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, but this has not been assessed. The absence of site-specific night-time data leaves a crucial gap in understanding the ecological impacts of the proposal.

Without a thorough examination of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites might be adversely affected. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and thereby obstructing a lawful determination.

From a policy standpoint, these omissions conflict with National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. They also undermine the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a fundamental aspect of the ecosystem.

In summary, the total lack of assessment concerning dark skies and nocturnal wildlife represents a significant evidential gap. The deficiency in baseline data, impact modelling, and species-specific analysis results in an application that is incomplete and unable to support a lawful determination.

TOURISM

The application inadequately assesses the impacts on tourism, which is vital to the economy of the Isle of Lewis. This sector relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application recognises that 86% of visitors are attracted by the scenery, it fails to quantify how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has witnessed substantial growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, representing up to 16% of the island's economy. Nevertheless, the application does not analyse how the

industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without such an analysis, it remains unclear whether the development would yield a net economic benefit or threaten an established and expanding sector.

Furthermore, the role of environmental quality in bolstering tourism is not addressed. The significance of unspoiled landscapes and dark skies in enhancing visitor experiences and emerging markets, such as nature-based tourism and astro-tourism, is overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the impacts on this recognised and growing segment of the local economy.

The implications of failing to assess tourism impacts extend beyond the sector itself, affecting employment, local businesses, and the sustainability of the community within this island context that has limited economic diversification. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated as required under the Islands (Scotland) Act 2018.

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

In summary, the shortcomings in quantifying tourism impacts, the neglect to assess the environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in meeting the requirements for sustainable development. It fails to address statutory duties, national policy, and evidential standards. Similar issues that led to the rejection of the Lewis Wind Power proposal in 2008 have resurfaced, where the unacceptable scale of industrialisation was previously highlighted. This proposal, despite being presented under a stronger policy framework that emphasizes biodiversity, peatland protection, landscape integrity, and community wellbeing, does not provide a reliable evidential basis for determination.

There are significant gaps in baseline data, a reliance on an undefined design envelope, and unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment is incomplete, limiting a comprehensive understanding of the likely significant effects and residual impacts.

Procedural deficiencies are also apparent. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the complete Social Impact Assessment is a material omission. These shortcomings inhibit the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts with the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural areas, or cultural heritage. Health and wellbeing impacts have not been shown to be acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been adequately assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and internally inconsistent. The evidential standard required to confirm that adverse effects do not exist beyond reasonable scientific doubt has not been met. This engages the precautionary principle and prevents a lawful conclusion that impacts can be deemed acceptable.

Moreover, the proposal would lead to considerable and irreversible changes to a sensitive landscape. Industrialization along the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and 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 volume of missing information, policy conflicts, and unresolved environmental risks impede a lawful and evidence-based decision. The competent authority should either refuse consent based on these grounds or utilize the relevant regulatory provisions to require the submission of the outstanding information.

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: 178E790B

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

Dear Sir/Madam

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

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

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

The scale of the wind farm is unprecedented in this area, with large turbines situated close to the shoreline, raising critical concerns about landscape capacity, visual dominance, and environmental effects. The combination of insufficient information, reliance on vague mitigation strategies, evidential shortcomings, and clear breaches of policy demonstrates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a comprehensive and trustworthy evaluation of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty hinders the effective application of a worst-case scenario, ultimately compromising the assessment's integrity. Consequently, the impacts outlined may not accurately represent the development that will be constructed, preventing both the public and the competent authority from grasping the true scale of environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. Seeking consent on the premise that environmental harm will be rectified at a later stage undermines any meaningful evaluation of their effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures be clearly established prior to determination.

Additionally, there are major evidential shortcomings, including gaps in baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. This leads to uncertainty about the magnitude and significance of impacts, especially where negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainties that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This scenario invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also fails to align with National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity, as it is unable to demonstrate that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned assessment of alternatives, resulting in an inadequacy that does not meet the statutory requirements of the Environmental Impact Assessment regime. Instead of a thorough comparison of realistic alternatives based on their environmental effects, it presents a narrative on

project evolution. This approach does not prove that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparent and evidence-based evaluation of alternative offshore locations, development scales, or design configurations. Notably, the developer has not shown that the possibility of placing turbines further offshore has been seriously considered, which would likely reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline underscores the critical importance of considering proximity to shore when determining potential impact. Without such analysis, it is impossible to conclude that the proposed siting is the least damaging option available.

These shortcomings extend to the assessment of cable routing and landfall. There is insufficient evidence to suggest that alternative routes have been adequately examined to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate a failure to apply mitigation by design, instead relying on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and routing of infrastructure. This represents a failure to adhere to 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 determined that the proposal is sustainable or compliant with policy.

From a policy standpoint, this lack of structured assessment undermines adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a comparative assessment is a significant omission that leads to the conclusion that the application has not been adequately evaluated and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is lacking and does not give a complete or trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the baseline data presented is insufficient, and the methods used do not effectively capture species presence, behaviour, and habitat usage. Consequently, the assessment fails to provide a solid evidential basis for assessing impacts.

A major gap involves otters, which are a European Protected Species. The application does not adequately recognise or evaluate their use of coastal regions for foraging and movement. Without considering their core foraging areas and behaviours, the potential effects from construction disturbances, noise, and increased activity have not been

properly examined. This oversight undermines any conclusions drawn about the lack of significant effects on otters.

Additionally, there are further shortcomings in the assessment of basking sharks. The reliance on aerial surveys brings significant detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is particularly evident when compared to established land-based observations that show these waters are used frequently. Neglecting to include or properly consider this data results in an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological flaws mean that claims of negligible or non-significant effects are based on assumptions instead of solid evidence. Furthermore, the lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual risks to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The concerns surrounding the ornithological assessment are significant, revealing major flaws that challenge its conclusions. The development's location on the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already in decline, necessitates a higher evidential standard to ensure that these species will not face adverse effects. However, the application fails to adequately assess the implications of displacement, collision risk, or habitat loss, particularly within key foraging areas and migratory pathways.

A notable inconsistency arises in the application, where the developer asserts that there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically invoked only when significant harm is anticipated. This contradiction raises doubts about the assessment's credibility and indicates a lack of support for the conclusions drawn from the available evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The crucial feeding grounds are not thoroughly considered, and the reliance on modelling approaches adds uncertainty, especially for declining species like Kittiwakes and

Fulmars. The methodologies employed appear to underestimate mortality rates, compounded by incomplete baseline data and an inadequate understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents another serious risk, as it creates a barrier along a primary flight path that species use when travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor are not adequately evaluated, nor are the potential effects on species with smaller global populations considered. From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby undermining the validity of any conclusions drawn in favour of consent.

Additionally, the deficiencies noted reflect 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 in direct conflict with national policy. Collectively, these issues reveal an assessment that is unreliable, marred by internal inconsistencies, methodological shortcomings, and a lack of sufficient evidence. These inadequacies hinder a thorough evaluation of impacts and culminate in the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is fundamentally insufficient, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interwoven. The application reduces heritage to isolated, static assets, disregarding their ongoing social, cultural, and spiritual significance within the community.

Culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas, are misrepresented in the assessment. These locations serve as active sites of burial and spiritual practice, yet they are classified as static features. This mischaracterisation neglects their current use and meaning, as well as the impact of development on their setting, leading to an incomplete evaluation of cultural effects and dismissing their importance within community life.

Moreover, the assessment fails to consider intangible cultural heritage, such as the Gaelic language, traditions, and the established relationship between the community and the coastal environment. These aspects are integral to the area's identity but have been entirely omitted from the assessment, creating a significant gap. Without addressing these factors, the true cultural impact of the development remains poorly understood.

Concerns extend to community rights and engagement. The Gaelic-speaking population holds a unique cultural identity with characteristics of an Indigenous People; however, no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement questions the legitimacy of the assessment and neglects established principles regarding participation in decisions that affect cultural and environmental interests.

A serious procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately fulfil its legal obligation to evaluate the social, cultural, and economic ramifications for the island community. This omission alone renders any lawful determination impossible.

From a policy standpoint, these shortcomings clash directly with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, indicates a clear deviation from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations leads to a substantial evidential gap. The cultural consequences of the development have not been adequately examined, and the application does not establish a sufficient foundation for evaluating the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's approach to assessing social impacts, health, and wellbeing is inadequate and lacks necessary transparency. Although a Social Impact Assessment was commissioned, which included focus groups with local residents, the complete report remains unpublished. This creates a notable gap in evidence and restricts both public insight and the competent authority's understanding of the social risks identified by the developer's own research.

Residents are reportedly experiencing increased levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects arise from direct community engagement and are not based on speculation. However, without access to the full assessment, proper scrutiny of these findings is impossible, limiting the ability to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this recognition, such impacts have not been adequately reflected in the main application or given sufficient consideration. The lack of a complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency is detrimental to the Environmental Impact Assessment

process. Understanding the full range of social, economic, and health impacts is critical for developments of this magnitude, especially when the character and functioning of the community may be at stake. By failing to provide the complete data set, the application does not offer a comprehensive evidential basis to weigh benefits against harm.

From a policy standpoint, the application does not align with National Planning Framework 4 regarding health and wellbeing. Development is expected to promote positive health outcomes and mitigate harm, yet the evidence at hand indicates significant adverse effects that have not been fully disclosed. Without the complete assessment, it is not possible to establish compliance with this policy.

The implications of these procedural shortcomings 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 omission constitutes a significant flaw in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

Overall, the failure to disclose the complete Social Impact Assessment, along with evidence of current negative impacts, renders the assessment both incomplete and unreliable. This situation hinders a lawful determination and reinforces the assertion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. This development would create a continuous industrial presence that fundamentally alters the existing landscape, resulting in a permanent and irreversible transformation. The application fails to accurately represent the magnitude of visual change that would result from the turbines, which would dominate views from residential areas, historic sites, and popular coastal locations, thereby impacting visual amenity and eroding the qualities of naturalness and remoteness.

Additionally, there are methodological issues concerning the selection and presentation of visual viewpoints within the assessment. It appears that some viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight introduces the risk of understating the visual impact, which ultimately undermines the reliability of the entire assessment.

Another significant shortcoming is the lack of consideration for the interconnected relationship between seascape, landscape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated rather than recognising their interdependence, the assessment results in an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

Moreover, the impacts identified 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 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 deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of the landscape in question.

CONSTRUCTION AND POLLUTION RISKS

The assessment provided regarding construction and pollution risks is notably deficient, lacking the essential detail needed to properly evaluate potential environmental impacts. The project entails significant seabed preparation and installation activities within a dynamic Atlantic environment, yet it does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that will only be developed after consent, which hampers any meaningful assessment of their adequacy or effectiveness.

The reliance on these vague future measures raises serious concerns, particularly due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it falls short in providing adequate details on how these risks will be prevented, managed, or monitored.

Furthermore, there is considerable uncertainty surrounding the magnitude and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without thorough modelling and well-defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also encompasses potential effects on marine species and habitats identified as sensitive in broader assessments.

Compounding these issues is the lack of detailed emergency response procedures. By

postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether effective safeguards are available to address pollution incidents. This procedural risk weakens the competent authority's capability to assess environmental protection measures prior to making a determination.

From a regulatory standpoint, the postponement of key environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent is issued, and when such information is absent, a lawful determination cannot occur. Additionally, the application does not adequately demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty concerning potential impacts collectively render the assessment seriously flawed. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of marine life and fisheries, failing to provide a comprehensive evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the proposal does not demonstrate that these habitats and uses can be safeguarded from disruption.

One major issue is the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds exist, are accessible, or can endure additional pressure. This absence of information is crucial, as such displacement could lead to overfishing in other areas and have broader economic implications for the local fishing fleet. Without a thorough and evidence-based assessment, the potential effects on fisheries and local livelihoods remain unclear.

The proposal also poses significant risks to marine species, particularly due to underwater noise from construction activities. Prolonged hammer piling may disturb marine life over large areas, with the local bottlenose dolphin population expected to be significantly affected. The application downplays the seriousness of these impacts without adequate evidence, raising concerns about its reliability.

Moreover, there is a noticeable inconsistency within the application regarding the need for licences to harm European Protected Species, while simultaneously classifying these impacts as negligible. This contradiction questions the credibility of the assessment and highlights potential issues with compliance under the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

The assessment neglects to address cumulative impacts arising from various pressures, such as habitat disturbance, noise pollution, and fishing displacement. 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 viewpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity. Consequently, it cannot be concluded that the proposal constitutes sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, underappreciation of acoustic impacts, and internal inconsistencies renders the assessment unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines alongside the onshore works is fundamentally lacking and does not account for the full range of impacts related to what is essentially one integrated project. The linkage between the offshore and onshore elements is critical, yet the two are evaluated separately, leading to a disjointed approach that conceals the true extent of the environmental and socio-economic effects.

Onshore developments include the installation of cabling across protected moorland and the construction of a substation near Stornoway, along with necessary access infrastructure traversing sensitive landscapes. These works involve excavation in areas of deep peat, particularly within Barvas Moor, which is a vital carbon store and ecologically significant habitat. The application fails to deliver a thorough assessment of these impacts, obstructing a comprehensive understanding of the project's overall environmental footprint.

By excluding or postponing the evaluation of onshore impacts, the application hinders the accurate assessment of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components in unison; however, the distinct separation of offshore and onshore elements means that the combined repercussions on peatlands, habitats, and local communities are not fully comprehended.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under policy measures. The application lacks evidence demonstrating that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place. This results in a significant evidential gap regarding the protection of biodiversity.

Concerns about carbon balance also arise from the proposal. Disturbing peatland can

release stored carbon, potentially leading to a carbon debt that undermines the aims of renewable energy initiatives. The application does not sufficiently tackle this concern or show that the overall carbon balance remains advantageous.

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

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

Overall, the disconnection between project components, the lack of a comprehensive assessment, and the absence of evidence concerning environmental and land use impacts leave this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant gap within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, creates an intrusive "wall of light" effect across the western horizon. This alteration to the night-time environment is not addressed in terms of its impact on visual amenity, landscape character, or the experiences of both residents and visitors. Given the relevance of dark skies to local identity and emerging sectors such as astro-tourism, this omission is particularly concerning.

Moreover, the application neglects to evaluate the impacts on nocturnal wildlife, which is crucial given that species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting. Phototaxis can lead to disorientation and increased risk of collision for these species. The absence of any lighting impact assessment or phototaxis study means there is no consideration of how aviation lighting could affect these species and potentially increase mortality rates.

This critical oversight is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activities and related risks. Species like Kittiwakes, which might forage or migrate at night, are equally at risk of disorientation from artificial lighting; however, this risk remains unassessed. Without site-specific night-time data, a fundamental understanding of ecological impacts is lacking.

Consequently, without a thorough assessment of nocturnal impacts, it becomes

impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and thereby hindering a lawful determination.

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

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 incapable of supporting a lawful determination.

TOURISM

The assessment of tourism impacts is fundamentally inadequate and neglects to address the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and sense of remoteness. The application itself notes that 86% of visitors are attracted by the scenery, yet fails to provide a quantified evaluation of how extensive offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

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

The assessment further overlooks the critical role of environmental quality in supporting tourism, including the value of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant void in understanding the impacts on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not illustrate compliance with National

Planning Framework 4, particularly regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Collectively, the failure to quantify tourism impacts, assess environmental factors affecting visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards required for sustainable development, particularly when evaluated against statutory responsibilities, national policy, and evidential requirements. It echoes the central concerns that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the extent of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community welfare, the application falls short.

Critical deficiencies plague the evidential basis for the proposal, revealing gaps in baseline data and the continued utilisation of an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and neglects to address key impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of potential significant effects or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment represents a material omission. Such shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In direct contradiction to National Planning Framework 4, the proposal does not adequately demonstrate protection of biodiversity, natural habitats, and cultural heritage. It fails to verify that health and wellbeing impacts are acceptable and lacks evidence of net economic benefits due to the absence of tourism impact modelling. The cumulative impacts associated with both offshore and onshore elements have not been thoroughly assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold required 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 impacts.

Moreover, the proposal is poised to bring about considerable 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 the impacts on tourism represent enduring effects that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The array of information deficiencies, coupled with conflicts in policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. The competent authority must either reject consent on these grounds or invoke the necessary regulatory provisions to compel 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.

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: 3245220C

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and the associated documentation, revealing significant deficiencies across planning, environmental, cultural, and procedural aspects. 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 proposal lacks a solid evidential foundation for a lawful determination. Essential environmental data is absent, with limited and inconsistent baseline information, and several critical aspects of the proposal remain undefined. The application employs a flexible design framework that hinders a clear understanding of the likely significant effects. Moreover, the reliance on unspecified mitigation measures prevents any assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the impacts on the environment, culture, and community, and assertions of negligible or non-significant effects lack robust evidential support.

The application demonstrates clear policy inconsistencies. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient evidence to prove that the national obligations regarding biodiversity, climate interests, and environmental integrity will be met. These inconsistencies challenge the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises substantial concerns, with large turbines sited close to the shoreline, resulting in significant implications for landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicate that the application is incomplete and incapable of sustaining a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, and trustworthy evaluation of the potential

environmental impacts of the proposal. A flexible Project Design Envelope is employed without commitment to specific dimensions or configurations of turbines, resulting in considerable uncertainty. This lack of specificity hinders the consistent application of a worst-case scenario, thus compromising the integrity of the assessment. Consequently, the impacts outlined may not correspond to the actual development, obscuring the true extent of environmental effects for both the public and the competent authority.

The application predominantly hinges on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought on the premise that any environmental damage will be managed at a later stage. This approach inhibits any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. Such deferral of crucial information to post-consent phases is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies are explicitly established before the determination process.

Moreover, there exist substantial evidential shortcomings, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions instead of robust site-specific evidence. This leads to uncertainty regarding both the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without sufficient supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

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

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These significant deficiencies impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information presented.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the application is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The

application fails to convincingly demonstrate that these species will not be adversely affected, particularly given the development's location within key foraging areas and migratory pathways.

A fundamental contradiction exists within the application, where the developer concludes there are no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions presented lack support from the underlying evidence.

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 critical feeding grounds is not fully acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in instances where baseline data is lacking and behavioural responses are not completely understood.

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

From a regulatory standpoint, the application does not meet the evidential threshold required to conclude that there is no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This scenario engages the precautionary principle and obstructs a lawful conclusion in support of consent.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment, commissioned by the developer and involving focus groups with local residents, has not been published, creating a significant evidential gap. This lack of transparency hinders both public understanding and the competent authority's ability to evaluate the social risks identified through the

developer's own research. Available summaries suggest that residents are already suffering from measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are not based on speculation, yet the failure to disclose the complete assessment restricts scrutiny of the findings and the assessment of their significance in the decision-making process.

Moreover, there is evidence that the proposal poses a perceived threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, these impacts have not been adequately integrated into the 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 lack of transparency also undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may affect community character and functioning. The application does not provide the full dataset, leading to an incomplete evidential basis for assessing the balance between benefits and harm.

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

The procedural ramifications are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material failure within the application, not meeting the evidential standards of the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, in conjunction with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and supports the assertion that the application lacks sufficient information.

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 under consideration lacks a thorough assessment of fisheries and marine life, failing to provide a solid evaluation of both ecological and socio-economic impacts. It does not sufficiently demonstrate how these important habitats and activities will be protected or maintained without significant disruption.

A critical concern is the assumption made within the application that fishing activity

can be displaced without any adverse consequences. There is no evidence provided to suggest that alternative fishing grounds exist, are accessible, or can handle the additional pressure that would result from such displacement. This significant omission raises concerns about the potential for overfishing in other areas, which could lead to broader economic repercussions for the local fishing fleet. Without a clear and evidence-backed assessment, understanding the impacts on fisheries and local livelihoods remains impossible.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated to occur over an extended period is expected to cause disturbances across considerable distances, affecting species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population is alarming; yet, the application tends to minimize the importance of these effects without providing adequate evidence.

There are also inconsistencies within the application itself. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously describes the expected impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially when potential harm is significant enough to necessitate legal authorisation.

Furthermore, the assessment neglects to consider cumulative impacts resulting 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 is unfeasible.

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 proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal supports sustainable development.

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

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 proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the critical issues that prompted the refusal of the Lewis Wind Power proposal in 2008, wherein the scale of industrialisation was deemed unacceptable. Despite being presented within a more robust policy context, which prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

A thorough evidential basis for determination is lacking. There are significant gaps in baseline data and an undefined design envelope, alongside an over-reliance on unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects, are notably omitted. Consequently, the Environmental Impact Assessment is inadequate, failing to facilitate a complete understanding of the likely significant effects and residual impacts.

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

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, in some instances, lack internal consistency. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and inhibits a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal is poised to cause substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the implications for tourism signify permanent effects that cannot be adequately mitigated.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 9B0BCCC8

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

Dear Sir/Madam

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

The application lacks an adequate evidential basis for a lawful determination. There is a noticeable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key aspects of the proposal remain undefined. The employment of a flexible design framework hinders a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not afford a comprehensive understanding of the potential environmental, cultural, or community impacts, and the claims made regarding negligible or non-significant effects are not substantiated by robust evidence.

The proposal also presents clear and substantive conflicts with existing policy frameworks. It appears to be inconsistent 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. There is insufficient demonstration that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity are being met. These policy conflicts are directly relevant to the statutory tests required for consent and significantly undermine the ability of the competent authority to determine that the development is policy-compliant.

The scale of the proposed wind farm is unprecedented for this location, with large turbines proposed to be installed in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation measures, evidential weaknesses, and evident non-compliance with policy indicate that the application is incomplete and fails to support a lawful determination. Given these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks comprehensiveness and fails to deliver a transparent and reliable analysis of the potential environmental consequences of the proposed development. By employing a flexible Project Design Envelope that lacks concrete commitments to specific turbine dimensions, layouts, or configurations, the report introduces considerable uncertainty. This approach obstructs the consistent application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. Consequently, the impacts indicated may not accurately represent the actual development that will be constructed, which in turn hinders both public understanding and the competent authority's capacity to grasp the full extent of environmental implications.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Seeking consent on the premise that environmental harm will be rectified at a future date obstructs any thorough evaluation of the effectiveness of such measures or an assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable, as it contravenes the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established prior to determination.

The application also exhibits significant evidential gaps, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These issues result in uncertainty concerning the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, thus introducing scientific uncertainties that are incompatible with statutory obligations.

As a result, the application does not fulfil the evidential standards required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, specifically its requirements for biodiversity protection and environmental integrity, as it has not been proven that impacts have been comprehensively assessed or that appropriate safeguards exist.

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

ASSESSMENT OF ALTERNATIVES

The inadequacy of the alternatives assessment is significant, as it does not adhere to the statutory requirements of the Environmental Impact Assessment regime. The

application offers a narrative of the project's evolution rather than a structured, reasoned comparison of realistic alternatives based on their environmental effects. This method fails to show that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

The lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, and design configurations is particularly concerning. The application does not convincingly demonstrate that the developer has given serious consideration to locating turbines further offshore, where the visual, ecological, and coastal impacts would likely be less severe. The West Lewis coastline is sensitive, and the crucial role of proximity to shore in determining impact highlights the critical need for this analysis; without it, there is no basis for concluding that the proposed siting represents the least damaging option.

This issue extends to the cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been implemented, with an overreliance on post-design mitigation measures. Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing.

This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to ascertain whether less harmful and more appropriate alternatives exist. Without a comprehensive alternatives assessment, it cannot be concluded 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 represents a material omission that reinforces the conclusion that the application has not been adequately assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the West Lewis coastal environment is fundamentally flawed, lacking a complete and reliable understanding of the area's ecological receptors. This marine system is both sensitive and biologically active, yet the methodologies employed do not sufficiently capture the presence, behaviour, or habitat use of key species. Consequently, the assessment fails to provide a sound evidential basis for evaluating potential impacts.

One significant oversight involves otters, a European Protected Species, which have not been properly recognised or assessed in their use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an inadequate evaluation of how construction disturbance, noise, and increased activity could affect them. This lack of assessment undermines any

assertions regarding the absence of significant effects on this species.

Additionally, the evaluation of basking sharks is inadequate due to an overreliance on aerial surveys, which introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared with established land-based observations that show frequent use of these waters. The disregard for such data results in an incomplete baseline, further weakening the reliability of the assessment's conclusions.

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

From a regulatory standpoint, the application does not fulfil the necessary 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 by these deficiencies hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thus activating the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

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 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding the onshore infrastructure is fundamentally inadequate and overlooks the full range of impacts associated with what constitutes a single integrated project. There exists an intrinsic link between the offshore turbines and the onshore works, yet these components are evaluated separately, leading to a fragmented methodology that obscures the overall environmental and socio-economic ramifications.

The onshore works encompass cabling through protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure traversing sensitive landscapes. These undertakings require excavation in areas of deep peat, particularly within Barvas Moor, which serves as a critical carbon store and ecologically sensitive habitat. The current application does not deliver a thorough

assessment of these impacts, which inhibits a comprehensive understanding of the project's total environmental footprint.

Moreover, the omission or postponement of the assessment concerning onshore impacts hampers an adequate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project must be assessed collectively; however, the distinct treatment of offshore and onshore components results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Significant risks to sensitive habitats also arise, including machair systems and peatland environments that are under policy protection. The application fails to prove that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a substantial evidential gap concerning biodiversity protection.

In addition, the routing of infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application lacks evidence that essential consents or processes have been initiated, raising concerns about the feasibility and lawful execution of the project.

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

In conclusion, the disaggregation of project components, the absence of a thorough assessment, and the lack of demonstrable evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, inhibiting 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 Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the critical concerns that led to the refusal of the Lewis Wind Power proposal in 2008, notably the unacceptable scale of industrialisation. The current proposal is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not adequately address these priorities.

There are significant gaps in the evidential basis for the proposal, including incomplete baseline data and reliance on an undefined design envelope. Furthermore, the application lacks clarity regarding mitigation measures and does not address crucial impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of the likely significant effects and any residual impacts.

Procedural failures are also evident. The proposal lacks a compliant Island Communities Impact Assessment, violating statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a full Social Impact

Assessment is a significant omission. These shortcomings impede the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

Moreover, the proposal contradicts National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. The absence of tourism impact modelling raises questions about the net economic benefit of the project. Furthermore, the cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The evidential standard required to confidently rule out adverse effects has not been achieved, necessitating the application of the precautionary principle and preventing any lawful conclusion regarding acceptable impacts.

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

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

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

Additional Comments

Although Lewis is no longer my home I can foresee this's project will have a very detrimental impact on the wild and scenic beauty of the island. Folk will no longer benefit from looking out on the clear horizon from Shawbost beach. Instead it will be reminiscent of a city skyline. What about tourism? What about the intrinsic beauty of the island and effect on sea life ? Madness. Please heed the wishes of the majority of the population and supporters of the true natural beauty of this tiny part of the world

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E30B0B8C

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. The application falls under the marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents reveals several significant deficiencies relating to planning, environmental impact, cultural considerations, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity.

The application lacks a solid evidential foundation for a lawful decision. Important environmental data is absent, and the baseline information provided is both limited and inconsistent. Additionally, key aspects of the project are not clearly defined. The use of a flexible design framework obscures the likely significant effects, while the reliance on unspecified mitigation measures means that their potential effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsupported by robust evidence.

There are evident conflicts with existing policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for obtaining consent and hinder the competent authority's ability to determine that the development aligns with policy objectives.

The scale of the proposed project is unprecedented for this area, with large turbines sited close to the shoreline, raising substantial issues related to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy requirements indicate that the application is incomplete. It fails to support a lawful determination, and therefore, the precautionary principle should be applied.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant deficiencies in the ornithological assessment, raising substantial concerns about its reliability. The conclusions drawn are undermined by internal inconsistencies and gaps in evidence. Notably, the west coast

of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines, yet the application fails to satisfactorily demonstrate that these species will not be adversely impacted. The proposed development is sited within critical foraging areas and migratory pathways, yet the assessment inadequately considers the potential consequences of displacement, collision risk, or habitat loss.

A significant contradiction is evident, as the developer asserts that no significant adverse effects will occur, while also advancing a Habitats Regulations derogation case, which is only warranted in situations where significant harm is anticipated. This inconsistency casts doubt on the assessment's reliability and suggests that its conclusions are not substantiated by adequate evidence. Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not thoroughly evaluated, and the reliance on modelling techniques introduces a level of uncertainty, particularly for declining species such as Kittiwakes and Fulmars. The methodologies utilised may underestimate mortality rates, especially given incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively acting as a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term impacts of sustained mortality within this corridor or the potential consequences for species that have relatively small global populations.

From a regulatory standpoint, the evidential threshold necessary to assert no adverse effect on the integrity of protected sites is not met. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, precluding a lawful conclusion that would support consent.

Moreover, the identified shortcomings reflect 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 summary, the assessment's internal inconsistencies, methodological weaknesses, and insufficient evidence render it unreliable. These failings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application proposes a development that fails to adequately assess the cultural heritage and community identity of the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are

intrinsically connected. The evaluation adopts a reductive view of heritage, treating it as isolated and static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

A significant deficiency in the assessment is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet they are categorised as static features, overlooking their continued use, meaning, and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their essential role in community life.

Furthermore, the application neglects to assess intangible cultural heritage, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely absent from the assessment, representing a considerable omission. Without considering these factors, the cultural impact of the development cannot be accurately understood.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking, failing to capture the true extent of the changes anticipated and

the sensitivity of the surrounding environment. The character of the West Lewis coastline is defined by its open view of the Atlantic and its undeveloped, remote nature. The proposed large-scale turbines would intrude upon this landscape, establishing an industrial presence that would irrevocably alter its character and result in a permanent transformation.

Furthermore, the evaluation does not accurately depict the magnitude of the visual alterations that would occur. Given the scale and proximity of the turbines, they would dominate the views from residential areas, historic locations, and popular coastal spots. This dominance would have a detrimental effect on visual amenity and diminish the essential qualities of naturalness and remoteness that define this area. The assessment's failure to adequately address the significance of these impacts in such a sensitive landscape is concerning.

Methodological flaws have also been identified regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most severe scenarios, especially concerning critical cultural heritage sites and valued landscapes. This oversight raises the possibility that the true scale of the visual impact has been underestimated, calling into question the reliability of the assessment's findings.

Additionally, the assessment does not adequately consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context, linked visually and spatially to the Atlantic horizon. Treating these assets as isolated entities neglects their interdependence, resulting in an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context within which heritage sites are appreciated and breaking their link to the natural horizon. This represents not only a visual impact but also a cultural and spatial harm that the application has not sufficiently addressed.

From a policy standpoint, the proposal contradicts the guidelines outlined in the National Planning Framework 4, particularly regarding the protection of natural landscapes and heritage sites. The extent of the proposed changes conflicts with requirements to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further compromises the proposal's compliance with established policy.

It is evident that the impacts highlighted cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in fundamental and permanent changes that cannot be reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage.

These shortcomings hinder a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the need to protect this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application is materially deficient due to the absence of defined mitigation measures and the lack of detailed management plans. There is an incomplete assessment of construction and pollution risks, which does not provide the necessary detail to evaluate likely environmental effects. The proposal includes substantial seabed preparation and installation works within a high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined mitigation and contingency measures that will only be prepared post-consent, which inhibits any meaningful assessment of their adequacy or effectiveness.

This reliance on future measures raises significant concerns, particularly because of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats, which are vulnerable to disturbances from sediment and potential contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail how these risks will be prevented, controlled, or monitored.

Uncertainty also exists regarding the scale and behaviour of sediment plumes that will arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it remains impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Further complicating these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application prevents any evaluation of whether appropriate safeguards are in place to respond to pollution events. This not only introduces procedural risk but also undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed before consent is granted. When such information is lacking, a lawful determination cannot be made. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of these shortcomings—lack of detailed management plans, the absence of defined mitigation measures, and uncertainty regarding potential impacts—renders the assessment inadequate. This prevents a thorough evaluation of

construction and pollution risks and supports the conclusion that the application is incomplete.

TOURISM

The analysis of the economic and social consequences of tourism on the Isle of Lewis is seriously lacking and does not account for the essential role this sector plays in the local economy. Tourism relies heavily on the area's wild coastline, unspoilt landscapes, dark skies, and a sense of remoteness. Despite the application stating that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might impact visitor numbers, behaviour, or overall economic contribution.

Since 2017, tourism has seen substantial growth, increasing from £65 million to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not model the potential effects of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added or the resilience of the wider economy. Without this analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or harm an established and thriving sector.

The assessment neglects to acknowledge the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience and developing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, leading to a considerable gap in understanding the impacts on this recognised and expanding segment of the local economy.

In a community like the Isle of Lewis, which has limited economic diversification, the failure to evaluate the impacts on tourism has far-reaching implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately assessed as required by the Islands (Scotland) Act 2018.

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

In summary, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that influence visitor behaviour, and recognising the island's economic dependency result in a significant evidential gap. This hampers 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 exhibits significant deficiencies that render it unfit for determination. The application does not fulfil the requirements for sustainable development as prescribed by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, notably the unacceptable scale of industrialisation. This new application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to adequately address these concerns.

Critical gaps in baseline data undermine the evidential basis for determination. The continued reliance on an undefined design envelope and unspecified mitigation measures raises questions about the robustness of the application. Additionally, it omits vital impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

There are also notable procedural shortcomings. The lack 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 complete Social Impact Assessment is a material omission that prevents the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies collectively contribute to the application being deemed unfit for determination.

The proposal contravenes the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It fails to illustrate that health and wellbeing impacts are acceptable, and it cannot 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 appropriately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are both significant and concerning. The assessments of marine ecology, seabirds, protected species, and marine mammals lack completeness and internal consistency. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Moreover, 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, and the disruption of cultural and visual relationships pose permanent effects that cannot be adequately mitigated.

In summary, the application demonstrates serious procedural and substantive inadequacies. The combined scale of information deficiencies, along with conflicts with established policy and unresolved environmental risks, hinder a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or utilises the appropriate regulatory provisions to mandate the submission of the missing information.

In light of these considerations, 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 visit the island to birdwatch and to enjoy the scenery and the island way of life both of which would be severely impacted by this project. Such large structures so close to the island are bound to negatively affect both wildlife and tourism.

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: B2149BF0

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies across various domains, including 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 compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application does not present a sufficient evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Additionally, important elements of the proposal remain undefined. The flexible design framework employed obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures precludes any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

There are significant and clear conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests required for consent and impair the competent authority's ability to determine the proposal's acceptability within policy frameworks.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises considerable concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance suggests that the application is incomplete and unable to facilitate 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 proposal lacks a thorough assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a coherent and reasoned comparison of feasible alternatives based on their environmental consequences, the application offers a narrative that recounts the project's development. This method does not establish that less harmful options have

been adequately identified, evaluated, and favoured over more damaging solutions.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is characterised by a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is significantly deficient. There is an incomplete understanding of ecological receptors within this area, primarily due to inadequate baseline data and ineffective methodologies that fail to accurately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A notable oversight in the application involves otters, which are classified as a European Protected Species. The assessment does not adequately acknowledge their active use of coastal areas for foraging and movement, and it overlooks their core

foraging range and behavioural patterns. This omission means that the potential impacts of construction disturbance, noise, and increased activity have not been properly evaluated, ultimately undermining claims of no significant effects on the species.

Further issues arise with the assessment of basking sharks, which relies heavily on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate or appropriately consider such information results in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

The limitations in these methodologies lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty about the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as the identification and assessment of protected species are inadequate. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises serious concerns due to its fundamental contradictions and methodological weaknesses. It fails to provide adequate evidence regarding the impact on internationally important seabird populations found along the west coast of the Isle of Lewis, many of which are already experiencing decline. The application does not convincingly demonstrate that these species will remain unaffected, particularly given the site's location within key foraging areas and migratory pathways.

There is a significant lack of robust evaluation concerning crucial issues such as displacement, collision risk, and habitat loss. Moreover, the developer's assertion of no significant adverse effects contradicts the simultaneous argument for a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its

conclusions are unsupported by sound evidence.

The methodologies utilised in the assessment appear to underestimate potential mortality rates, especially for species like Kittiwakes and Fulmars that are already in severe decline. The assessment also fails to appropriately consider the implications of placing turbines in a recognised migratory corridor, effectively creating barriers for species that migrate between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor, particularly for species with relatively small global populations, have not been adequately addressed.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. Data gaps, contradictory conclusions, and limitations in the modelling approach indicate that the standard of beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful conclusion in favour of consent.

These deficiencies also represent a failure to comply with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Overall, the assessment is unreliable, marked by internal inconsistencies and a lack of sufficient evidence, which undermines the ability to accurately evaluate impacts and concludes that the application does not meet the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development does not adequately assess the cultural heritage and identity of the community, particularly along the West Lewis coastline, which is a vibrant cultural landscape where language, tradition, community, and environment are deeply intertwined. The application takes an overly simplistic view of heritage, treating it as a collection of isolated assets rather than recognising their ongoing 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 sites serve as active places for burial and spiritual observance, yet the assessment categorises them as static features, overlooking their continued significance and the potential impacts of development on their settings. This misunderstanding leads to an incomplete evaluation of cultural effects and disregards the cemeteries' integral role in community life.

Moreover, the assessment neglects intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and its coastal environment. These elements are essential to the area's identity, yet they are entirely omitted from the evaluation, highlighting a crucial gap. The

cultural impact of the proposed development cannot be fully comprehended without addressing these factors.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population possesses a unique cultural identity that aligns with recognised characteristics of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles of participation concerning cultural and environmental issues.

Additionally, there is a critical procedural flaw in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

Collectively, the neglect to assess living heritage, intangible cultural values, 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 robust basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding social impacts, health, and wellbeing, which remain inadequately assessed and lack the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the comprehensive report has not been made publicly available. This lack of access constitutes a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of the social risks identified through the developer's own research.

Reports suggest that local residents are currently facing measurable stress, anxiety, and apprehension due to the scale and proximity of the development proposal. These negative impacts stem from direct engagement with the community and are not mere speculation. Nonetheless, the absence of the full assessment obstructs proper examination of these findings and restricts the capacity to gauge their importance in the decision-making process.

Furthermore, there is evidence indicating that the proposed development is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the

developer's own findings. Unfortunately, these identified impacts have not been adequately incorporated into the main application nor afforded appropriate consideration. The withholding of the complete Social Impact Assessment thus obscures the genuine human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality may be at stake. By failing to provide the complete dataset, the application does not present a comprehensive evidential foundation needed for assessing the balance between benefits and detriments.

From a policy standpoint, the application does not show adherence to National Planning Framework 4 concerning health and wellbeing. Developments are mandated to promote positive health outcomes and avert harm, yet the information presently available indicates existing negative effects that remain undisclosed. Without the full assessment, it is impossible to demonstrate compliance with this policy.

The procedural implications arising from this situation are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material deficiency within the application and constitutes a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, together with 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 to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts fails to adequately reflect the scale of this change or the sensitivity of the surrounding environment.

The magnitude of the visual change has not been properly represented within the application. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the defining qualities of naturalness and remoteness. This assessment does not convey the true level of impact or its significance in the context of such a sensitive landscape.

Concerns arise regarding the selection and presentation of visual viewpoints. Evidence

indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially in relation to key cultural heritage sites and valuable landscapes. This raises the risk that the magnitude of visual impact has been understated, thereby undermining the assessment's reliability.

A significant omission is the failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a wider landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets in isolation, neglecting their interdependence, which leads to an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would sever these relationships, changing the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This presents not only a visual impact but also a broader cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The proposed scale of change is incompatible with safeguarding 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.

Moreover, 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. The resulting change is thus fundamental and permanent, rather than something that could be mitigated to an acceptable level.

Overall, the assessment fails to accurately depict the scale of impact, the environment's sensitivity, and the interconnectedness of landscape and heritage. These shortcomings impede a reliable evaluation and strengthen 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.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life is inadequate, resulting in a failure to provide a solid evaluation of the ecological and socio-economic impacts associated with the proposal. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these vital uses and habitats can be preserved or maintained without experiencing significant disruption.

A significant concern is the flawed assumption that fishing activities can be relocated without negative consequences. The application lacks evidence to prove that alternative fishing grounds are available, accessible, or capable of withstanding additional pressures. This oversight is critical, as displacing fishing activity poses a risk of overfishing in other areas and may lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and the livelihoods reliant on them remain unclear.

Furthermore, the proposal poses notable risks to marine species, particularly due to

the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended timeframe is likely to disturb a wide range of marine life, notably impacting species such as dolphins. The projected disturbances to a considerable portion of the local bottlenose dolphin population raise urgent concerns; yet, the application minimizes the significance of these effects without presenting sufficient supporting evidence.

The application also reveals a contradiction, as it acknowledges the necessity for licenses to allow harm to European Protected Species, while simultaneously downplaying the anticipated impacts as negligible. This inconsistency undermines the credibility of the assessment and raises doubts about compliance with the Habitats Regulations, especially in cases where harm is expected to a level that necessitates legal permission.

Moreover, the assessment neglects to consider cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. In the absence of a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project involves both offshore turbines and extensive onshore works, which are closely interconnected yet assessed independently. This separation leads to a fragmented evaluation that fails to reveal the overall environmental and socio-economic consequences of what is fundamentally a single integrated project. The onshore components consist of cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure across sensitive landscapes. Excavation across areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat, is a crucial concern. However, the application does not offer a thorough assessment of these impacts, thus obscuring the project's total environmental footprint.

The lack of comprehensive assessment extends to the cumulative effects of the project. By excluding or deferring the evaluation of onshore impacts, the application hinders a proper understanding of the combined effects on peatlands, habitats, and

local communities. The Environmental Impact Assessment process mandates that all elements of a project be considered together. Nonetheless, the disjointed approach to assessing offshore and onshore components means the full extent of impacts on sensitive habitats, such as machair systems and peatland environments, remains unclear. These habitats are under policy protection, yet the application fails to demonstrate that their impacts have been fully evaluated or that suitable avoidance measures are in place, leaving a significant evidential gap regarding biodiversity protection.

Moreover, the proposal raises urgent concerns about carbon balance. Disturbing peatland not only releases stored carbon but may also result in a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this critical issue and does not prove that the overall carbon balance remains favourable.

The routing of infrastructure through active croft land introduces further complications, creating potential conflicts with existing land use and legal rights. The application lacks sufficient evidence that the necessary consents or processes have been initiated, which raises serious doubts regarding both deliverability and lawful implementation.

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

Overall, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application not only incomplete but also unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly in the emerging sector of astro-tourism. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" visible over long distances, fundamentally changing the night-time environment. This alteration has not been assessed in terms of its impact on visual amenity, landscape character, or the experiences of both residents and visitors, representing a significant gap in the Environmental Impact Assessment.

Furthermore, there is no evaluation of the effects of this lighting on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can lead to disorientation and increased collision risks. The absence of a lighting impact assessment or phototaxis study means the application fails to consider how such aviation lighting may affect these species or

contribute to higher mortality rates.

Additionally, the ornithological assessment relies on daytime survey data, which overlooks nocturnal activity and associated risks. This is particularly concerning for species such as Kittiwakes, which may forage or migrate at night and are also vulnerable to disorientation from artificial lighting. Without site-specific night-time data, there is a critical lack of understanding regarding the ecological impacts. The failure to assess nocturnal impacts makes it impossible to ascertain whether protected species or designated sites might be adversely affected, breaching the evidential standard needed to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, hindering a lawful determination.

From a policy standpoint, these omissions conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. The gaps in assessment further undermine the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the ecosystem. Collectively, the lack of any assessment related to dark skies and nocturnal wildlife represents a significant evidential gap, rendering the application incomplete and unfit for 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 Spiorad na Mara Offshore Wind Farm proposal embodies a significant failure to meet the standards of sustainable development as defined by statutory duties, national policy, and evidential criteria. This application revives the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Now, it is being presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are serious shortcomings in the evidential basis for this proposal. It lacks complete and reliable baseline data, employs an undefined design envelope, relies on unspecified mitigation measures, and overlooks crucial impact pathways, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

The proposal also demonstrates clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty as outlined in the Islands (Scotland) Act 2018, and the omission of the full Social Impact Assessment is a significant gap. These failures impede the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

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

Environmental risks associated with this proposal remain uncertain and could be significant. Evaluations concerning marine ecology, seabirds, protected species, and

marine mammals are not only incomplete but also, in some instances, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the invocation of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is unfit for determination both procedurally and substantively. The multitude of information deficiencies, paired with policy conflicts and unresolved environmental risks, obstruct the ability to arrive at a lawful, evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

Please don't spoil the beauty of this island and it would impact marine and land wildlife

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: 18230156

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the marine licensing and Environmental Impact Assessment regimes. The concerns raised stem from a thorough examination of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west side of the Isle of Lewis, the proposed development exists in an area characterised by its Atlantic-facing coastline, near-pristine natural environment, and a strong cultural identity.

The application lacks a solid evidential foundation necessary for lawful determination. There are critical gaps in environmental data, while the baseline information presented is both limited and inconsistent, leaving many key elements of the proposal undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, and the mitigation measures suggested remain unspecified, rendering their effectiveness unassessable. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Moreover, the proposal presents clear and substantive conflicts with policy. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements intended to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests needed for consent and undermine the authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, the reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and unfit for lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to provide a complete, transparent, or trustworthy assessment of the potential environmental impacts of the proposal. The reliance on a flexible Project Design Envelope, which lacks

commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of specificity undermines the integrity of the assessment, resulting in a scenario where the impacts discussed may not accurately represent the development that will be constructed. Consequently, both the public and the competent authority are left without a true understanding of the environmental effects involved.

Furthermore, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed later hinders any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to stages following consent is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before any determination.

Significant evidential deficiencies also exist, including gaps in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not fulfil the evidential threshold necessary 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, especially regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully evaluated or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to demonstrate compliance with the statutory requirements of the Environmental Impact Assessment regime due to an inadequate assessment of alternatives. Instead of providing a reasoned comparison of realistic alternatives based on their environmental effects, the application offers a narrative regarding project evolution. This approach does not substantiate that less harmful options have been properly identified, assessed, and selected over more damaging alternatives.

Moreover, there is a lack of a transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered the option of placing turbines further offshore, an action that would likely mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact, the failure to conduct such an analysis precludes any determination that the proposed siting represents the least damaging option.

This inadequacy further extends to cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been adequately applied, with an overreliance on post-design mitigation measures instead.

Consequently, the application does not satisfactorily demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This deficiency signifies a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives may exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this shortfall undermines adherence to the National Planning Framework 4, particularly in its aims to protect natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that contributes to the overall conclusion that the application has not undergone adequate assessment and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This region, known for its sensitivity and biological activity, is not well represented in the baseline data gathered. The methodologies employed do not effectively capture the presence, behaviour, and habitat usage of key species, which compromises the validity of the impact evaluations.

One glaring oversight is the treatment of otters, a species protected under European law. The application neglects to properly identify and assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural habits means that the potential impacts of construction disturbance, noise, and increased activity remain inadequately evaluated. This omission significantly undermines claims regarding the absence of significant effects on otters.

Moreover, the assessment of basking sharks suffers from methodological flaws, particularly due to the reliance on aerial surveys that are prone to significant detection bias, especially under Atlantic conditions. This methodology likely results in an underrepresentation of their presence, in stark contrast to established land-based observations which indicate frequent usage of these waters. The disregard for or improper consideration of this crucial data further contributes to an incomplete baseline, compromising the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions about negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of adequate baseline data obstructs any meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. Consequently, this introduces uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements or the National Planning Framework 4, as it fails to accurately identify or assess protected species. The degree of uncertainty that arises prevents the possibility of ruling out adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, it is clear that consent cannot be legally granted.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These critical deficiencies hinder a robust evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment contains significant flaws, revealing substantial gaps in evidence and inconsistencies that challenge its findings. The Isle of Lewis's west coast is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately prove that these species will not be negatively impacted. It is situated in crucial foraging areas and migratory routes, yet the assessment inadequately considers the risks of displacement, collision, or habitat loss.

There is a notable contradiction in the application: the developer claims there are no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is typically necessary when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that its conclusions lack support from the underlying evidence. The assessment fails to convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding areas is not thoroughly addressed, and the reliance on modelling introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in severe decline. The

methodologies used are likely to underestimate mortality rates, especially given incomplete baseline data and insufficient understanding of behavioural responses.

The proposed location of turbines within a recognised migratory corridor raises further concerns, as it could create a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate the long-term effects of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to conclude there is no adverse effect on the integrity of protected sites. The presence of contradictory claims, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hampers a lawful conclusion supporting consent. Moreover, the identified deficiencies indicate a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

Overall, the assessment is deemed unreliable due to internal contradictions, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of the potential impacts and contribute to the conclusion that the application does not fulfill the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to adequately consider the cultural heritage and community identity of the West Lewis coastline, which is a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. It adopts a reductive view of heritage, treating it as a collection of isolated and static assets rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places for spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight neglects their continued use, meaning, and the impact that development may have on their settings. As a result, the cultural effects are incompletely evaluated, disregarding their integral role in community life.

Moreover, the assessment neglects intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity yet are entirely omitted from the evaluation, representing a significant oversight. The cultural impact of the development remains poorly understood without the consideration of these vital factors.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity with characteristics that align with those of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent conducted. This lack of meaningful engagement weakens the credibility of the assessment and fails to adhere to established principles of participation concerning cultural and environmental matters.

Additionally, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This alone renders the determination unlawful.

From a policy standpoint, these issues place the proposal in direct conflict with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The oversight of both tangible and intangible heritage, alongside the failure to recognise living cultural practices, signifies a clear violation of 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 sufficiently evaluated, and the application lacks a robust foundation for understanding the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment concerning social impacts, health, and wellbeing is significantly inadequate and lacks the transparency necessary for a lawful evaluation. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been made available. This creates a substantial evidential gap, hindering both public understanding and that of the competent authority regarding the full range of social risks identified in the developer's own research.

There is evidence suggesting that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are thus not conjectural. However, the non-disclosure of the full assessment inhibits proper scrutiny of the findings, limiting the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" acknowledged in the developer's findings. Despite this, such impacts have not been adequately incorporated into the main application or given the necessary consideration. The failure to disclose the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency detracts from the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functionality may be compromised. By not providing the complete dataset, the application does not offer a thorough evidential foundation for assessing the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and mitigate harm, yet the available evidence suggests existing adverse effects that remain partially undisclosed. Without the full assessment, compliance with this policy cannot be verified.

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 complete Social Impact Assessment. This represents a significant omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not reflect the sensitivity of the environment or the scale of change adequately. The West Lewis coastline, characterised by an open Atlantic horizon and an undeveloped character, offers a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create an overwhelming industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to accurately represent the extent of visual change. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct impact on visual amenity, eroding the essential qualities of naturalness and remoteness. The assessment does not properly convey the significance of this impact, especially within such a sensitive landscape.

Concerns arise over the selection and presentation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to significant cultural heritage sites and valuable landscapes. This raises the possibility that the magnitude of visual impact has been underestimated, which undermines the

reliability of the assessment.

Moreover, the application fails to evaluate the interconnected relationship between landscape, seascape, and cultural heritage effectively. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated assets, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The extent of change proposed is incompatible with the need to safeguard landscape character, visual amenity, and the context of culturally significant sites. The lack of a robust worst-case assessment further undermines the claim of compliance with policy.

Additionally, it is evident that the identified impacts cannot be effectively mitigated. The dominant and unavoidable presence of the turbines, due to their scale, height, and proximity, means that the resulting changes are fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The incomplete assessment of construction and pollution risks does not provide adequate detail for evaluating likely environmental effects. This proposal entails significant seabed preparation and installation activities in a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application relies on future mitigation and contingency measures that will be prepared after consent, which obstructs any meaningful assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures is particularly alarming due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer sufficient details on prevention, control, or monitoring measures.

There exists uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also pertains to potential effects on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application inhibits the assessment of whether suitable safeguards are established to address pollution incidents. This situation introduces procedural risk and diminishes the ability of the competent authority to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before granting consent; the absence of such information precludes a lawful determination. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts result in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks and further corroborate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of fisheries and marine life, failing to offer a robust evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these uses and habitats can be safeguarded or maintained without considerable disruption.

A critical flaw lies in the assumption that fishing activity can be displaced without repercussions. The application lacks evidence to confirm that alternative fishing grounds are not only available but also accessible and capable of bearing additional pressures. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. Consequently, without a clear and evidence-based assessment, understanding the impacts on fisheries and local livelihoods is impossible.

Moreover, the proposal poses considerable risks to marine species, especially through the underwater noise produced during construction. The use of high-energy hammer piling over prolonged periods is likely to disturb marine life over large distances, notably affecting species such as dolphins. The anticipated disturbance to a significant portion

of the local bottlenose dolphin population is alarming; yet, the application minimises these effects without adequate supporting evidence.

There is also a troubling inconsistency in the application regarding the acknowledgment of the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the absence of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies ultimately render the assessment incomplete and unreliable. These shortcomings prevent any meaningful evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

The exclusion or deferral of onshore impact assessments hinders the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process mandates a comprehensive evaluation of all project components, yet this disjointed approach prevents a full understanding of the combined impacts on peatlands, habitats, and local communities. This is particularly concerning given the risks to sensitive habitats, including machair systems and peatland environments that are under policy protection. There is a clear evidential gap regarding biodiversity protection, as the application does not adequately demonstrate that impacts on these habitats have been

fully assessed or that appropriate avoidance measures have been applied.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife is a significant flaw within the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will be visible over considerable distances, creating an intrusive “wall of light” effect on the western horizon that will fundamentally change the night-time landscape.

Furthermore, the proposal fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning as dark skies are essential to the identity of the region and to the growth of emerging sectors like astro-tourism. By neglecting these impacts, the assessment reveals a significant gap in the overall landscape and environmental evaluation.

Equally alarming is the lack of any investigation into the impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly susceptible to artificial lighting, which can disorient them and increase their risk of collision. The absence of a lighting impact assessment or a phototaxis study means there has been no consideration of how aviation lighting might affect these birds or contribute to their mortality rates.

This issue is worsened by the overreliance on daytime survey data in the ornithological

assessment, which fails to account for nocturnal activity or the associated risks. Even species like Kittiwakes, known to forage or migrate at night, are at risk of disorientation from artificial light, but this danger has not been evaluated. The lack of site-specific data regarding night-time activity leads to a critical misunderstanding of ecological impacts.

Without a thorough examination of nocturnal consequences, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The required evidential standard to dismiss adverse effects beyond reasonable scientific doubt is not achieved, necessitating the precautionary principle and preventing a lawful determination.

From a policy standpoint, this absence conflicts with the National Planning Framework 4 concerning the safeguarding of natural environments and environmental quality. It also diminishes the comprehensive evaluation of landscape and seascape impacts, given that the night-time character is a fundamental aspect of the environment.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife represents a considerable evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of supporting a lawful decision.

TOURISM

The economic contribution of tourism to the Isle of Lewis is substantial, having increased from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application lacks a meaningful evaluation of how the proposed large-scale offshore infrastructure could impact this vital sector. Despite acknowledging that 86% of visitors are attracted by the area's natural scenery, it fails to provide a quantified analysis of how this development may alter visitor numbers, behaviour, or overall economic contributions.

The significance of environmental quality in tourism cannot be overlooked. The dependence on unspoiled landscapes and dark skies is crucial for visitor experience, especially for emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment is particularly troubling, creating a considerable gap in understanding the effects on a sector that is not only recognised but also growing within the local economy.

In an island community that faces challenges related to economic diversification, the neglect to assess tourism impacts carries serious implications for local employment, businesses, and overall community sustainability. The lack of an Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not meet the requirements outlined in National Planning Framework 4, particularly concerning economic impact and the

demonstration of net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to assess the economic ramifications of the proposal adequately.

Overall, the failure to quantify the impacts on tourism, evaluate the environmental factors that influence visitor behaviour, and recognise the island's economic dependence on this sector results in a significant evidential gap. This omission undermines the possibility of a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant 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.

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: 1FE9B949

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 was submitted under the relevant marine licensing and Environmental Impact Assessment regimes. It draws upon a review of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich cultural identity. The design, scale, and proximity of the proposal raise serious issues regarding its alignment with statutory obligations, national policy, and the principles of sustainable development.

There is a lack of sufficient evidential support to permit a lawful determination regarding this application. Essential environmental data is absent, baseline information is both limited and inconsistent, and crucial elements of the proposal have yet to be defined. The application utilises a flexible design framework, which obscures a clear assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust supporting evidence.

Policy conflicts are both clear and substantial. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, thereby undermining the competent authority's ability to determine whether the development meets policy acceptance.

The unprecedented scale of the proposal presents notable challenges in this particular location, as large turbines are proposed to be situated near the shoreline, raising serious issues concerning landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and unfit to support a lawful determination. Given these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive and transparent evaluation of the potential environmental consequences of the proposal. The reliance on a flexible Project Design Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty obstructs the effective application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that is ultimately realised, leading to a situation where both the public and the competent authority are left unaware of the true extent of the environmental effects.

A concerning aspect of the application is its heavy dependence on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is being sought with the assumption that environmental harm will be managed later, which severely limits any thorough evaluation of the measures' effectiveness and assessment of residual impacts. This postponement of crucial information until after consent is granted is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly delineated before any decision is made.

Moreover, there are considerable evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without strong supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that fails to meet statutory requirements.

As a result of these deficiencies, the application does not satisfy the evidential threshold established 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. Additionally, the proposal does not demonstrate alignment with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, since it cannot be evidenced that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Overall, the reliance on an ill-defined design envelope, the absence of specified mitigation measures, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and rigorous evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application's assessment of alternatives is fundamentally lacking and does not satisfy the statutory requirements set forth by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives in terms of their environmental impacts, the documentation provides a narrative on the project's evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging alternatives.

There is no transparent or evidence-based evaluation of alternative offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has seriously explored the possibility of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. Considering the sensitivity of the West Lewis coastline and the significant role that proximity to shore plays in assessing impact, the lack of such an analysis precludes any determination that the proposed siting is the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis reveal that mitigation by design has not been implemented, with reliance instead on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species conducted in relation to this area is materially deficient, failing to provide a complete or reliable understanding of the ecological receptors involved. The baseline data is incomplete, and the methodologies employed do not adequately capture crucial information regarding species presence, behaviour, and habitat use. Consequently, the conclusions drawn do not rest on a sound evidential basis for evaluating potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant contradictions that undermine its credibility, notably the developer's assertion of no significant adverse effects while simultaneously arguing for a Habitats Regulations derogation. This derogation is only pertinent where there is an expectation of substantial harm, casting doubt on the reliability of the assessment and suggesting that the conclusions are not well-supported by the evidence provided. Furthermore, the ornithological assessment is critically flawed, revealing substantial gaps in evidence and internal inconsistencies.

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline, yet the application fails to adequately prove

that these species will not be adversely affected. Key foraging areas and migratory pathways, which are crucial for these populations, are not thoroughly evaluated in the assessment, particularly regarding displacement, collision risk, and habitat loss. The methodologies employed tend to underestimate potential mortality rates, especially given the incomplete baseline data and limited understanding of species' behavioural responses.

Siting turbines within a recognised migratory corridor introduces a severe risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been sufficiently assessed, nor have the potential effects on species with limited global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold needed to assert that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with gaps in data and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, obstructing a lawful conclusion in favour of consent.

The inadequacies identified also represent a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely impacted places the proposal in direct contradiction to national policy. Collectively, these issues render the assessment unreliable, due to its methodological weaknesses and insufficient evidence, preventing a comprehensive evaluation of impacts and leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is 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 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 West Lewis coastline is characterised by its open Atlantic horizon and undeveloped landscape, offering a strong sense of remoteness. The proposed large-scale turbines near the shoreline would introduce a dominant industrial presence that would permanently alter this unique character. The assessment of visual impacts fails to accurately convey the extent of this change. The turbines would significantly affect views from residential areas, historic sites, and popular coastal locations, leading to a loss of visual amenity and diminishing the qualities of naturalness and remoteness.

There are significant concerns about how visual viewpoints were selected and presented. Some viewpoints may not adequately represent the most sensitive areas or worst-case scenarios, especially concerning cultural heritage sites and valuable landscapes. This could lead to an understatement of the visual impact, raising doubts about the assessment's reliability.

Moreover, the assessment does not take into account 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 linked visually and spatially to the Atlantic horizon. By treating these sites as isolated, the assessment fails to consider their interdependent relationships, resulting in an

incomplete evaluation of their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these connections, changing how heritage assets are experienced and their relationship with the natural horizon. This change represents a visual and broader cultural impact that has not been properly addressed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The proposed changes are incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a solid worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and location of the turbines, their visual dominance would be unavoidable. Consequently, the change to the landscape would be fundamental and permanent, not 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 interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation and strengthen the argument that the proposal is not compatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and vital habitats that are sensitive to sediment disturbance and contamination. However, the proposal fails to adequately address construction and pollution risks associated with substantial seabed preparation and installation works within a high-energy Atlantic environment. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on future mitigation and contingency measures that will only be developed post-consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This lack of defined future measures is alarming, especially given the known risks such as sediment mobilisation and potential chemical or oil spills acknowledged in the application. Nonetheless, it provides insufficient detail on the strategies for preventing, controlling, or monitoring these risks. Furthermore, there is significant uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbances and cable installation. Without robust modelling and well-defined management strategies, it is impossible to gauge the extent, duration, or ecological consequences of these impacts, which could adversely affect already sensitive marine species and habitats.

The absence of thorough emergency response procedures adds another layer of concern. By postponing contingency planning until after consent is granted, the application precludes the evaluation of whether adequate safeguards are in place for

addressing potential pollution incidents. This approach introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures effectively at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards conflicts with the Environmental Impact Assessment regime's requirements. Significant effects and necessary mitigation measures must be evaluated prior to consent, and the lack of such information renders a lawful determination unachievable. Additionally, the application does not demonstrate compliance with the essential policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts leads to a materially deficient assessment. 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 diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life within the application is insufficient, lacking a robust evaluation of both ecological and socio-economic impacts. It fails to demonstrate that existing uses and habitats can be protected or maintained without significant disruption.

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

Additionally, the proposal introduces substantial risks to marine species, particularly due to the underwater noise generated during construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over large distances, including species such as dolphins. The anticipated impact on a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without adequate supporting evidence.

There is an inconsistency in the application regarding the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where potential harm necessitates legal authorisation.

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

activities. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The 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, creating an intrusive “wall of light” effect across the western horizon. This change fundamentally alters the night-time environment along the West Lewis coastline, which is characterised by exceptionally dark skies that contribute significantly to environmental quality, cultural identity, and tourism value.

Critically, the Environmental Impact Assessment lacks an evaluation of how this lighting may affect visual amenity, landscape character, and the experiences of both residents and visitors. Such an omission is concerning, especially as dark skies play a vital role in the area’s identity and in emerging sectors like astro-tourism. The absence of this assessment results in a noticeable gap in understanding the overall landscape and environmental impacts of the proposal.

Moreover, there is no consideration of the effects of artificial lighting on nocturnal wildlife. Species including the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to disorientation due to phototaxis, which can lead to increased collision risks. The application fails to include any lighting impact assessment or phototaxis study, thus neglecting to assess potential effects on these species or the possibility of increased mortality.

The inadequacy of relying solely on daytime survey data in the ornithological assessment further exacerbates this issue, as it does not account for nocturnal activity or the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unexamined. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, the omission of these assessments is in conflict with the

National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall ecosystem.

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

TOURISM

The application presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscape, dark skies, and sense of remoteness. Although it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution from tourism.

Tourism has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application fails to model how the potential industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the region. In the absence of such analysis, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the evaluation overlooks the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the oversight in assessing tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The failure to provide a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been appraised as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to exhibit a net benefit. Furthermore, it conflicts with strategic objectives that recognise tourism as a priority growth sector, and it does not furnish adequate evidence to enable the competent authority to evaluate the economic consequences of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors that drive visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This limitation undermines the capacity for 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 criteria for sustainable development, as it does not align with statutory duties, national policy, or evidential standards. It mirrors the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application comes under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There is a concerning lack of a comprehensive and reliable evidential basis for the application. Key data is missing, the design envelope remains undefined, and unspecified mitigation measures rely on assumptions rather than concrete plans. Furthermore, vital impact pathways, such as effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have not been addressed. Consequently, the Environmental Impact Assessment is inadequate, failing to elucidate the likely significant effects or residual impacts.

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

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

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 64872A34

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental, cultural, and procedural areas. 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 robust cultural identity. Concerns have been raised regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development, especially in light of its scale, proximity, and design.

The application presents a troubling lack of sufficient evidential support for a lawful determination. There are crucial gaps in environmental data, and baseline information is both limited and inconsistent, leaving many aspects of the proposal undefined. The flexible design framework employed obscures a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation does not facilitate a comprehensive or informed assessment of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are evident and serious policy inconsistencies with the proposal. It seems to contravene 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. Furthermore, the application does not convincingly demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and hinder the competent authority's ability to affirm the development's acceptability in policy terms.

The unprecedented scale of this proposal, characterised by large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information provided, the reliance on undefined mitigation measures, the evidential weaknesses, and the clear policy non-compliance signify that the application is incomplete and inadequate for lawful determination. Under these circumstances, it is imperative that the precautionary principle be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to its reliance on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the Environmental Impact Assessment. As a result, the projected impacts may not accurately represent the actual development, which obstructs both public understanding and the competent authority's ability to assess the true environmental effects.

Moreover, the proposal places considerable emphasis on undefined mitigation measures, monitoring strategies, and management plans. This deferral of essential information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime. The regime mandates that likely significant effects and their mitigation be established clearly before determination, and this proposal fails to meet that requirement.

The assessment also suffers from substantial evidential deficiencies, including gaps in baseline data and methodological limitations, leading to the use of assumptions instead of site-specific evidence. This creates uncertainty surrounding the scale and significance of impacts, especially where conclusions about negligible or non-significant effects are drawn without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt, invoking the precautionary principle particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Taken together, these factors—an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data—render the Environmental Impact Assessment Report both unreliable and incomplete. Such deficiencies obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a thorough assessment of alternatives, which is a significant shortcoming under the Environmental Impact Assessment regime. Instead of offering a clear and reasoned comparison of realistic alternatives based on their environmental impacts, the application merely recounts the project's evolution. This narrative approach does not prove that less harmful options were properly identified, evaluated, and selected over more damaging ones.

Additionally, there is a lack of transparent, 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 impacts related to visual, ecological, and coastal factors would likely be diminished. The sensitive nature of the West Lewis coastline and the critical importance of proximity to the shore in assessing impact highlight the inadequacy of the analysis provided, preventing any conclusions that the proposed siting is the least damaging option available.

These issues extend to the analysis of cable routing and landfall, with insufficient evidence presented that alternative routes were adequately explored to mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signals that mitigation by design has not been prioritised, instead relying on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a rigorous assessment of alternatives, it cannot be concluded that the proposal offers 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 environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is seriously lacking. This region is known for its sensitivity and biological activity, yet the baseline data presented is inadequate. The methodologies employed do not sufficiently capture the presence, behaviour, or habitat usage of key species, leading to a lack of reliable evidence for evaluating potential impacts.

In particular, there is a significant oversight regarding otters, classified as a European Protected Species. The application fails to properly acknowledge their active utilisation of coastal areas for foraging and movement. As a result, the assessment does not adequately consider their core foraging range and behaviour, leaving the potential impacts of construction disturbances, noise, and increased activity inadequately evaluated. Consequently, any claims regarding the absence of significant effects on otters are fundamentally undermined.

Furthermore, the assessment of basking sharks is flawed due to an overreliance on

aerial surveys, which introduce significant detection bias, particularly under Atlantic weather conditions. This methodology likely leads to an underestimation of their presence, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The disregard for such critical data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings result in conclusions of negligible or non-significant effects being based on mere assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers any meaningful analysis of cumulative and indirect impacts, including seasonal changes and interactions within the broader ecosystem. This introduces uncertainty about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species are notably absent. The resulting uncertainty prevents 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.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal presents serious flaws that critically undermine its conclusions. It is evident that the west coast of the Isle of Lewis is home to seabird populations of international significance, many of which are already experiencing decline. However, the application does not meet the necessary evidential standard to ensure that these species will not suffer adverse effects. The placement of the turbines within key foraging areas and migratory routes has not been thoroughly examined in relation to the risks of displacement, collision, or habitat loss.

A glaring contradiction is apparent in the application. The developer asserts that there will be no significant adverse effects, yet simultaneously presents a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency raises doubts about the credibility of the assessment and suggests that the conclusions drawn lack appropriate evidential backing.

Moreover, the assessment fails to provide sufficient evidence that seabird species linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is inadequately acknowledged, and the reliance on modelling techniques introduces considerable uncertainty. This is

particularly concerning for species that are already in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to understate mortality rates, especially where baseline data is lacking and behavioural responses have not been fully accounted for.

The location of turbines along a recognised migratory corridor poses a further significant risk, as it creates an obstruction in a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality in this corridor or the potential impact on species with relatively small global populations.

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

Furthermore, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to convincingly demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal contradictions, methodological flaws, and a lack of compelling evidence. These weaknesses inhibit a thorough evaluation of the potential impacts and lead to the overall conclusion that the application does not satisfy the statutory criteria essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage along the West Lewis coastline is seriously lacking. It fails to recognise this area as a living cultural landscape, where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic view, treating heritage merely as a collection of isolated, unchanging assets, rather than understanding their dynamic social, cultural, and spiritual roles within the community.

A major shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places for spiritual practices, but the assessment categorises them as static features. This approach neglects their ongoing use and meaning, as well as the potential impacts of development on their surroundings. As a result, the evaluation of cultural effects is incomplete and does not reflect their importance in community life.

Moreover, the application overlooks intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the

community and the coastal environment. These aspects are crucial to the area's identity, yet they are absent from the assessment, representing a significant oversight. Without addressing these factors, the true cultural impact of the development remains unclear.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that aligns with characteristics of an Indigenous People. However, no Free, Prior and Informed Consent process has been undertaken. This lack of meaningful engagement undermines the credibility of the assessment and does not reflect the established principles of participation in decisions that affect cultural and environmental interests.

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

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a clear deviation from policy standards.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory requirements creates a substantial evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application lacks a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposal is fundamentally inadequate and lacks the necessary transparency for a lawful assessment. Although the developer engaged in a Social Impact Assessment that included local residents through focus groups, the complete report remains unpublished. This significant evidential gap hinders both the public and the competent authority from grasping the full extent of the social risks identified by the developer's own research.

Residents have reported experiencing measurable stress, anxiety, and concern resulting from the scale and proximity of the proposed development. These impacts, arising from direct engagement with the community, are based on real experiences rather than speculation. Nonetheless, the absence of the full assessment inhibits proper examination of these findings and restricts the ability to assess their implications in the decision-making process.

Furthermore, the proposal is seen as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this recognition, these significant impacts have not been fully accounted for in the main application or given the necessary weight. The lack of transparency surrounding 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. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this nature, particularly when community character and functionality may be at stake. By failing to provide the complete dataset, the application lacks a thorough evidential basis for weighing benefits against potential harms.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy cannot be established.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This deficiency precludes a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is fundamentally flawed, failing to adequately capture the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its expansive Atlantic view, its undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible change in the landscape.

Moreover, the application does not sufficiently illustrate the extent of the visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal spots, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts in light of the area's sensitive landscape.

There are serious methodological issues concerning the choice and representation of visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, thereby compromising the assessment's reliability.

Another critical deficiency lies in the lack of evaluation of the interconnected relationship between seascape, landscape, and cultural heritage. Notably, the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape linked to the Atlantic horizon by visual and spatial connections. The assessment treats these assets as isolated, ignoring their interdependence and leading to an incomplete assessment of the impacts on their setting and cultural importance.

The industrialisation of the seascape would sever these vital connections, altering how heritage assets are perceived and disrupting their relationship with the natural horizon. This constitutes not only a visual impact but also a significant cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The level of change proposed is incompatible with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resultant changes are fundamental and permanent, rather than being reducible to acceptable levels through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The application proposes substantial seabed preparation and installation works in a high-energy Atlantic environment, but it lacks the necessary detail to assess potential environmental effects adequately. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, and it relies heavily on mitigation and contingency measures that would only be prepared after consent. This approach is particularly concerning given the sensitivity of the West Lewis coastline, which supports clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination.

The application acknowledges various risks, including sediment mobilisation and

potential chemical or oil spills, yet it provides insufficient information on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty regarding the behaviour and scale of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to gauge the extent, duration, or ecological effects of such impacts, raising concerns about their implications for marine species and habitats that have already been identified as sensitive.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is granted, the application hinders an assessment of whether adequate safeguards are in place to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, this deferral of critical environmental safeguards conflicts with the stipulations of the Environmental Impact Assessment regime, which requires an assessment of likely significant effects and mitigation measures prior to granting consent. The absence of crucial information means that a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the shortcomings of not having defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts contribute to a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The current application presents a troubling lack of thoroughness in its assessment of fisheries and marine life, failing to adequately evaluate both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a bustling fishing industry, yet there is no assurance that these essential uses and habitats can be safeguarded without significant disruption.

A critical flaw lies in the presumption that fishing activity can be displaced without repercussions. The application fails to provide evidence that there are alternative fishing grounds available, accessible, or capable of absorbing additional pressures. This oversight is particularly alarming, as it poses a risk of overfishing in other areas and may result in broader economic implications for the local fishing fleet. Without a rigorous and evidence-based assessment, it is impossible to accurately comprehend the impacts on fisheries and local livelihoods.

Moreover, the proposal poses considerable threats to marine species, especially due to the underwater noise created during construction. The prolonged use of high-energy hammer piling is expected to disturb species, such as dolphins, over significant

distances. The anticipated disturbance to a large portion of the local bottlenose dolphin population raises urgent concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

There is a marked contradiction within the application regarding the acknowledgment of the need for licences to permit harm to European Protected Species, whilst simultaneously characterising impacts as negligible. This inconsistency casts doubt on the credibility of the assessment and raises questions about adherence to the Habitats Regulations, especially in cases where harm is likely to occur at a level necessitating legal approval.

Additionally, the assessment neglects to account for cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. In the absence of a thorough evaluation of these combined effects, it is not possible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the proposed development can coexist harmoniously with existing marine users or prevent unacceptable harm to marine biodiversity, thereby undermining claims of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The fragmented assessment of the proposed project fails to consider the interconnected nature of the offshore turbines and the associated onshore works. This separation obscures the full extent of environmental and socio-economic impacts, creating an incomplete evaluation. The application inadequately addresses the critical assessment of onshore infrastructure, which is vital for understanding the project's overall environmental footprint.

The onshore infrastructure includes cabling that crosses protected moorland, the construction of a substation near Stornoway, and the necessary access routes through sensitive landscapes. These activities involve excavation in deep peat areas, particularly within Barvas Moor, recognised as an important carbon store and ecologically sensitive habitat. Without a comprehensive assessment of these impacts, the application hinders a full understanding of the project's consequences.

Significant risks to sensitive habitats are evident, particularly in machair systems and peatland environments, both of which are protected under policy. The application fails to adequately assess the impacts on these habitats or implement appropriate

avoidance measures, highlighting a notable gap in biodiversity protection.

Moreover, the proposal raises serious concerns regarding carbon balance. Disturbance of peatland can release stored carbon, leading to a potential carbon debt that undermines the very objectives of renewable energy development. The application does not sufficiently address this critical issue or prove that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights, raising questions regarding the deliverability and lawful implementation of the project. The application lacks evidence that the necessary consents or processes have been initiated, complicating matters further.

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

In summary, the separation of project components, the absence of a thorough assessment, and a lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, preventing a lawful determination. Immediate action is required to rectify these issues.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant evidential gap. The West Lewis coastline is noted for its exceptionally dark skies, which are essential to the region's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting, which would be visible over considerable distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly notable given the significance of dark skies to the area's identity and the growth of tourism sectors, such as astro-tourism. The neglect of these impacts represents a shortfall in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and heightened collision risks. The application does not include any lighting impact assessment or phototaxis study, thereby failing to assess the potential effects of aviation lighting on these species and the risk of increased mortality.

This deficiency is further exacerbated by the reliance on daytime survey data in the

ornithological assessment, which does not account for nocturnal activity or related risks. Other species, such as Kittiwakes, which may forage or migrate at night, are similarly vulnerable to disorientation due to artificial lighting, yet this risk has not been addressed. The lack of site-specific night-time data creates a substantial gap in understanding the ecological impacts.

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

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

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife signifies a major evidential deficiency. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to facilitate a lawful determination.

TOURISM

The assessment of tourism impacts is fundamentally inadequate and neglects to address the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and sense of remoteness. The application itself notes that 86% of visitors are attracted by the scenery, yet fails to provide a quantified evaluation of how extensive offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

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

The assessment further overlooks the critical role of environmental quality in supporting tourism, including the value of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant void in understanding the impacts on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Collectively, the failure to quantify tourism impacts, assess environmental factors affecting visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails fundamentally to meet the requirements of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application recapitulates the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was determined. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not rectify past deficiencies.

The evidential basis for determination is both incomplete and unreliable. There are notable gaps in baseline data, an undefined design envelope is maintained, and unspecified reliance on mitigation measures persists. Additionally, key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment remains incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural failings are evident, notably the lack of a compliant Island Communities Impact Assessment, which constitutes a breach of the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment represents a material omission. These shortcomings inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately demonstrate the protection of biodiversity, natural places, or cultural heritage. It lacks evidence that health and wellbeing impacts are acceptable and fails to provide a net economic benefit due to insufficient tourism impact modelling. The

cumulative impact of both offshore and onshore elements has not been properly evaluated, masking effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal are both uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and preventing a lawful determination of acceptable impacts.

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

Collectively, these deficiencies in the application render it procedurally and substantively unfit for determination. The significant information gaps, alongside conflicts with policy and unresolved environmental risks, obstruct a lawful, evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

My mother was born and brought up on the West side of Lewis and I have been going up to the islands all my life. This project simply cannot go ahead.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 57DE51B3

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 appropriate marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report alongside other supporting documents, revealing significant deficiencies relating to planning, environmental aspects, cultural considerations, and procedural adherence. 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 robust cultural identity. Concerns are raised regarding the compatibility of the proposal's scale, proximity, and design with existing statutory requirements, national policies, and the tenets of sustainable development.

The application does not furnish an adequate evidential basis necessary for a lawful determination. It lacks critical environmental data, and the baseline information provided is both limited and inconsistent, with several key elements of the proposal remaining undefined. The application's use of a flexible design framework obfuscates the potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining the claims of negligible or non-significant effects due to a lack of robust supporting evidence.

There exist clear and significant conflicts with policy. The proposal shows inconsistencies 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 the national requirements for safeguarding biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly challenge the statutory tests necessary for consent, thereby compromising the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces large turbines situated in close proximity to the shoreline, which raises substantial concerns regarding the landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance illustrate that the application is incomplete and cannot sustain a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a comprehensive and transparent account of the anticipated environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking commitments to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders a reliable worst-case scenario analysis. This compromises the assessment's integrity and prevents both the public and the competent authority from grasping the true scale of environmental impacts.

There is an overreliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consequently, consent is sought with the assumption that environmental damage will be remedied later, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contravenes the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established prior to decision-making.

The application also contains notable evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory obligations.

As a result, the application does not satisfy the evidential threshold required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes stipulations related 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 combination of an undefined design envelope, absence of specified mitigation measures, and deficiencies in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These inadequacies impede a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make an informed determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives and fails to meet the statutory requirements of the Environmental Impact Assessment. Instead of providing a structured comparison of realistic alternatives based on environmental effects, it offers a narrative about the project's evolution. This method does not prove that less harmful options have been properly identified, assessed, and chosen over more damaging ones.

There is a lack of transparent and evidence-based comparisons of various offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be reduced. The sensitivity of the West Lewis coastline and the importance of proximity to shore in assessing impact highlight the need for this analysis, which is currently absent.

The deficiencies also affect cable routing and landfall assessment. There is insufficient evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been considered, relying instead on post-design measures.

Due to these shortcomings, the application does not demonstrate that environmental harm has been minimised through the selection of site, layout, and infrastructure routing. This indicates a failure to follow the established mitigation hierarchy, which prevents the competent authority from determining if less harmful and more suitable alternatives are available. Without a robust alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with policy.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a significant deficiency in its assessment of marine ecology and protected species, leading to an unreliable understanding of ecological receptors in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is incomplete. The methodologies used fail to capture the presence, behaviour, and habitat usage of the species accurately, which compromises the evidential foundation necessary for evaluating potential impacts.

One notable oversight is the treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal areas for foraging and movement. By neglecting to assess their core foraging range and behavioural patterns, the potential effects of construction-related disturbance, noise, and increased activity on otters are not properly evaluated. This lack of consideration undermines any assertions regarding the absence of significant effects on this species.

The assessment also inadequately addresses basking sharks, where reliance on aerial surveys leads to substantial detection bias, particularly in challenging Atlantic

conditions. This method is likely to result in an underestimation of the species' presence, especially when compared to land-based observations that indicate regular use of these waters. The failure to incorporate or adequately analyse such pertinent data leads to an incomplete baseline, further weakening the reliability of the conclusions drawn.

Due to these methodological shortcomings, the conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The insufficient baseline data also hinders meaningful assessments of cumulative and indirect impacts, including those arising from seasonal variations and broader ecosystem interactions. This lack of clarity raises concerns about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty created by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, the granting of consent under these circumstances would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is significantly flawed, containing substantial gaps in evidence and inconsistencies that undermine its findings. The Isle of Lewis's west coast is home to internationally important seabird populations that are already experiencing declines. However, the application does not adequately demonstrate that these species will remain unaffected, as required by the relevant evidential standards. The turbines are sited within vital foraging areas and migratory pathways, yet the assessment fails to thoroughly evaluate potential risks, including displacement, collision, and habitat loss.

There is a notable contradiction in the application where the developer asserts that there are no significant adverse effects, while also submitting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling approaches adds uncertainty, particularly for species that are already in severe decline, like Kittiwakes and Fulmars. The methodologies employed may underestimate mortality

rates, especially where baseline data is lacking and behavioural responses remain unclear.

The placement of turbines within a recognised migratory corridor presents an additional and serious risk, potentially obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential 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 effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, preventing a lawful conclusion in favour 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 show that internationally significant seabird populations will not be adversely impacted directly conflicts with national policy.

Collectively, these issues render the assessment unreliable due to internal contradictions, methodological flaws, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of the potential impacts and lead to the overall conclusion that the application fails to satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage assessment related to the West Lewis coastline is fundamentally inadequate. It fails to recognise the area as a living cultural landscape, where environment, language, tradition, and community are deeply interconnected. Instead of acknowledging the ongoing social, cultural, and spiritual functions of heritage, the application adopts a reductive approach, treating it as a collection of isolated and static assets.

Significant deficiencies are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites are active places of burial and spiritual practice. However, the assessment categorises them merely as static features. This oversight disregards their continued use and the impact of development on their setting, leading to an incomplete evaluation of cultural effects and ignoring their importance in community life.

The assessment also fails to consider intangible cultural heritage, including the Gaelic language, traditions, and the established relationship between the community and the coastal environment. These elements are vital to the area's identity but are completely overlooked in the assessment, marking a significant omission. Without these

considerations, the true cultural impact of the development cannot be understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, with characteristics recognised as those of an Indigenous People. Yet, the application has not undertaken any process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and fails to uphold established participation principles in decisions affecting cultural and environmental interests.

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

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

In conclusion, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not provide a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment concerning social impacts, health, and wellbeing is significantly inadequate and lacks the transparency necessary for a lawful evaluation. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been made available. This creates a substantial evidential gap, hindering both public understanding and that of the competent authority regarding the full range of social risks identified in the developer's own research.

There is evidence suggesting that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are thus not conjectural. However, the non-disclosure of the full assessment inhibits proper scrutiny of the findings, limiting the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" acknowledged in the developer's findings. Despite this, such impacts have not been adequately incorporated into the main application or given the necessary consideration. The failure to disclose the complete Social Impact

Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency detracts from the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functionality may be compromised. By not providing the complete dataset, the application does not offer a thorough evidential foundation for assessing the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and mitigate harm, yet the available evidence suggests existing adverse effects that remain partially undisclosed. Without the full assessment, compliance with this policy cannot be verified.

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 complete Social Impact Assessment. This represents a significant omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application's assessment of seascape, landscape, and visual impacts is deficient. It does not adequately convey the magnitude of the visual change that would occur. The scale and proximity of the turbines mean that they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the key qualities of naturalness and remoteness. Moreover, the assessment fails to properly represent this level of impact or its significance in the context of a sensitive landscape.

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

assessment has understated the magnitude of visual impact, undermining its reliability.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete and fails to provide the necessary detail for evaluating likely environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, relying instead on mitigation and contingency measures that will be prepared after consent. This approach hinders any meaningful assessment of their adequacy or effectiveness.

The West Lewis coastline, known for its clean coastal waters and sensitive habitats, is particularly vulnerable to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on how these incidents will be prevented,

controlled, or monitored. There is considerable uncertainty regarding the scale and behaviour of sediment plumes arising 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 could affect marine species and habitats already identified as sensitive.

Moreover, the absence of detailed emergency response procedures exacerbates these issues. By deferring contingency planning until after consent, the application does not allow for the evaluation of whether appropriate safeguards exist to respond to pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards conflicts with the Environmental Impact Assessment regime requirements. Significant effects and mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be made. Additionally, the application fails to demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts render the assessment materially deficient. These deficiencies prevent a robust evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project lacks completeness and fails to consider the comprehensive impacts associated with what is a single integrated project. The onshore works are intrinsically linked to the offshore turbines; however, they have been evaluated separately. This fragmented assessment obscures the true scale of both environmental and socio-economic effects.

Onshore elements include significant infrastructure such as cabling traversing protected moorland, the construction of a substation close to Stornoway, and associated access routes through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. The absence of a thorough assessment concerning these impacts hinders a complete understanding of the overall environmental footprint of the project.

By neglecting to address onshore impacts in a timely manner, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered in tandem; yet, the division of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully comprehended.

Additionally, significant risks to sensitive habitats, such as machair systems and peatland environments which are under policy protection, remain unaddressed. The application fails to show that these habitats' impacts have been adequately assessed or that appropriate avoidance measures are in place, highlighting a clear evidential gap regarding biodiversity protection.

Concerns also arise surrounding the carbon balance implications. The disturbance of peatland has the potential to release stored carbon, creating a carbon debt that stands in contrast to the aims of renewable energy development. The application does not sufficiently tackle this issue or provide assurances that the overall carbon balance is beneficial.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land uses and legal rights. The lack of evidence demonstrating that necessary consents or processes have been initiated raises significant doubts about the deliverability and lawful implementation of the project.

From a policy standpoint, the inability to assess the project holistically and to assure the protection of peatlands, habitats, and land use interests contradicts both the National Marine Plan and National Planning Framework 4. The failure to illustrate that potential impacts can be avoided or mitigated further diminishes the credibility of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

The ornithological assessment relies solely on daytime survey data, which fails to

account for nocturnal activity and the associated risks for species like Kittiwakes that may forage or migrate at night. This lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal. Without a thorough assessment of these nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful determination.

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

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

TOURISM

The tourism sector on the Isle of Lewis has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which now supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the assessment of the application inadequately addresses the potential economic and social impacts on this critical sector. Tourism relies heavily on the area'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 assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Moreover, the assessment neglects to evaluate how the industrialisation of the seascape and a loss of environmental quality could affect the Tourism Gross Value Added and broader economic resilience. Without this analysis, it is impossible to ascertain whether the proposed development would generate a net economic benefit or hinder a sector that is already established and growing.

The role of environmental quality in supporting tourism is also overlooked, particularly concerning the significance of unspoiled landscapes and dark skies for visitor experiences, which are crucial for emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment further highlights this deficiency, creating a major gap in understanding the impacts on an increasingly recognised aspect of the local economy.

In an island community with limited economic diversification, the failure to assess tourism impacts carries broader ramifications for employment, local businesses, and community sustainability. The lack of 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 compliance with National Planning Framework 4, especially regarding economic impact and the need to show a net benefit. It conflicts with strategic objectives that identify tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

Taken collectively, the absence of a detailed quantification of tourism impacts, the lack of consideration for environmental factors influencing visitor behaviour, and the oversight of the island's economic dependency lead to a significant evidential gap. This gap inhibits a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the principles of sustainable development, as it fails to align with statutory duties, national policy, and evidential standards. This application revisits the core concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. The current proposal is put forward within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis for assessment, with significant gaps in baseline data. It employs an undefined design envelope and depends on unspecified mitigation measures while failing to address critical impact pathways, including nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, hindering a full understanding of the likely significant effects and residual impacts.

There are notable procedural shortcomings as well. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the lack of a full Social Impact Assessment constitutes a substantial omission. These deficiencies 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 contradicts the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

The 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 sometimes contradictory. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The extent of information deficiencies, combined with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the necessary 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.

Additional Comments

The Isle of Lewis has been populated for thousands of years. Its history is unique & constantly being discovered. The latest discovery, within a few miles of the proposed turbines, of a wooden henge & associated crannog in Loch Bhorgastail reveals another strand of human history and our ancestors relationship with the heavens. The erection of these mammoth steel structures will bring to an end the 'dark skies' of millennia. A view that has existed for time immemorial to be lost forever. Is this progress? Is this what we should be doing to our unpolluted, natural and heavenly landscape? Where is our sense of belonging & sense of the past? Will the lessons of history never be learned?

I strongly object to the obliteration of our evolution & history through a totally insensitive, massive, industrial creation in one of the last wild places in the British Isles. This projects impact is irreparable. We will all be for the poorer if this violation is permitted.

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: 6A36E6F6

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 review of the Environmental Impact Assessment Report and associated documents, revealing significant planning, environmental, cultural, and procedural shortcomings. The proposed site is located off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns about the scale, proximity, and design of the proposal question its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide an adequate evidential basis for a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and many key elements of the proposal are not clearly defined. The use of a flexible design framework complicates the assessment of likely significant effects, and reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the provided documentation fails to offer a full understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are notable and serious conflicts with policy. The proposal seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests needed for consent and hinder the competent authority's ability to determine the development's acceptability within policy frameworks.

The scale of this proposal is unprecedented for the area, with large turbines proposed close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. When considered together, the lack of sufficient information, dependence on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unsuitable for lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report falls short in its capacity to provide a full and transparent account of the potential environmental consequences of the proposed development. One critical issue is the reliance on a flexible Project Design Envelope, which lacks commitment to specific dimensions, layouts, or configurations of turbines. This introduces significant uncertainty and hampers the assessment's integrity, as it obscures the potential impacts that the final development may entail. Consequently, both the public and the competent authority are unable to grasp the true extent of the environmental effects involved.

Moreover, the application places considerable emphasis on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent under the premise that environmental harm will be mitigated post-consent precludes any substantive evaluation of these measures' effectiveness or the assessment of residual impacts. This postponement of vital information contradicts the core aim of the Environmental Impact Assessment process, which mandates that significant effects and mitigation strategies must be clearly identified before a determination can be made.

The report also exhibits significant evidential shortcomings, such as insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly where negligible or non-significant effects are concluded without adequate supporting data. The lack of comprehensive information obscures understanding of cumulative and worst-case impacts and introduces scientific uncertainties that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential criteria set forth by the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. The precautionary principle must be engaged, especially regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly in areas concerning biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or if suitable safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data leads to an Environmental Impact Assessment Report that is both unreliable and incomplete. These deficiencies hinder a lawful and thorough evaluation of environmental impacts, leaving the competent authority unable to make a fully informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies that compromise the understanding of ecological receptors in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data provided is incomplete. The methodologies employed fail to

adequately document species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, a European Protected Species. The application does not sufficiently recognise or assess their active use of coastal regions for foraging and movement. The disregard for their core foraging range and behavioural patterns means that the potential effects from construction disturbance, noise, and increased activity have not been properly evaluated. This oversight undermines any assertions regarding the absence of significant effects on this species.

Further concerns arise regarding basking sharks, as the reliance on aerial surveys is prone 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 regular use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological flaws mean that conclusions of negligible or non-significant effects are based on assumptions rather than sound evidence. The lack of comprehensive baseline data hinders meaningful assessments of cumulative and indirect impacts, which encompass seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risks to 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 the identification and assessment of protected species have been inadequately executed. The uncertainty introduced precludes the exclusion of adverse effects 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 shortcomings 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 assessment presented in the application raises significant concerns regarding its reliability and thoroughness, primarily due to internal inconsistencies and substantial evidence gaps. It is critical to note that the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing declines. The application fails to sufficiently demonstrate, to the necessary evidential standard, that these species will not face adverse impacts. Key foraging areas and migratory pathways, which are crucial for these birds, are affected by the proposed development. However, the assessment does not adequately address the implications of potential displacement, collision risks, or habitat loss.

A notable contradiction is evident within the application itself, as the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is typically needed when significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and indicates that its conclusions are not underpinned by solid evidence. The assessment lacks adequate evidence regarding the impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds is insufficiently acknowledged, and the use of modelling approaches introduces further uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in the context of incomplete baseline data and incomplete understanding of species' behavioural responses.

The positioning of turbines within an acknowledged migratory corridor poses additional significant risks, as it effectively creates a barrier along a primary flight route for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been adequately assessed, nor have the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory findings, 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, which precludes a lawful conclusion in favour of consent.

Moreover, the deficiencies identified signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy.

In conclusion, the overall assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These deficiencies hinder a thorough evaluation of the potential impacts, leading to the overarching conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

An essential oversight is evident in how the assessment addresses culturally significant

sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet are mischaracterised as static features. This neglect fails to acknowledge their continued use and meaning, as well as the detrimental impact that development could have on their settings. This misrepresentation leads to a partial evaluation of cultural effects and ignores their vital role in community life.

Moreover, the assessment completely overlooks intangible cultural heritage, such as the Gaelic language, local traditions, and the profound connection between the community and the coastal environment. These aspects are fundamental to the area's identity, yet they remain unaddressed in the evaluation, creating a significant gap in understanding the cultural implications of the proposed development.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity with characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and neglects established principles regarding participation in decisions that impact cultural and environmental interests.

Further compounding these issues is the critical absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission is significant enough to render any determination unlawful.

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

Taken as a whole, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the development remain unexamined, leading to the conclusion that the application lacks a solid foundation for evaluating the true cultural cost of the proposal.

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.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with the proposal is inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate

that these vital uses and habitats can be preserved or maintained without significant disruption.

One critical flaw lies in the assumption that fishing activity can be displaced without repercussions. The application offers no evidence that alternative fishing grounds are available, accessible, or capable of managing the additional pressure. This lack of information is crucial, as such displacement poses risks of overfishing in other areas, potentially leading to broader economic implications for the local fishing fleet. Without a clear and substantiated assessment, the ramifications for fisheries and local livelihoods remain poorly understood.

Moreover, the proposal raises significant risks for marine species, primarily due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to disturb marine life across considerable distances, impacting species including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays these effects without adequate supporting evidence.

There is a troubling inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, yet the impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, particularly when harm is expected to occur to a degree that necessitates legal authorisation.

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

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

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

TOURISM

The assessment of tourism impacts within the application is notably inadequate and neglects to address the economic and social implications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a profound sense of remoteness. The application itself

acknowledges that 86% of visitors are attracted by the scenery, yet it lacks a quantified analysis of how the introduction of large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution to the region.

The significance of tourism in the local economy is underscored by its substantial growth, with revenues increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, accounting for as much as 16% of the island's economy. Despite this impressive development, the application fails to simulate how the industrialisation of the seascape and the degradation of environmental quality could adversely affect Tourism Gross Value Added and the broader economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and expanding sector.

Moreover, the assessment neglects the essential role that environmental quality plays in bolstering tourism, including the critical importance of unspoiled landscapes and dark skies in enriching visitor experiences and tapping into emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a significant gap in understanding the impacts on a recognized and growing segment of the local economy.

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

From a policy standpoint, the application fails to illustrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefits. It also contradicts strategic objectives that prioritise tourism as a key growth sector and lacks sufficient evidence for the competent authority to properly assess the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental factors driving visitor behaviour, and account for the island's economic dependency culminates in a significant evidential gap. This deficiency inhibits a comprehensive appraisal of the economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm presents a significant inadequacy in meeting the criteria for sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable extent of industrialisation was highlighted. This current proposal, however, is put forward within a more robust policy framework that emphasises the

importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Moreover, the application lacks a comprehensive and reliable evidential basis essential for determination. There are substantial gaps in baseline data, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Additionally, critical impact pathways concerning nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects have been neglected. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to include a compliant Island Communities Impact Assessment is a breach of duty under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment represents a significant omission. These issues obstruct the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

In terms of alignment with National Planning Framework 4, the proposal is at odds with its requirements. It does not demonstrate adequate protection of biodiversity, natural areas, and cultural heritage. Furthermore, it has not substantiated that health and wellbeing impacts are acceptable, nor has it provided evidence of 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 crucial effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain ambiguous and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

Additionally, the proposal threatens to induce substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism represent permanent impacts that cannot be sufficiently mitigated.

In light of these factors, the application is both procedurally and substantively unfit for determination. The breadth of informational deficiencies, coupled with conflicts in policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority refuse consent on these grounds or invoke the appropriate regulatory measures to obtain the requisite missing information.

Thus, 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: 0F68758E

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the marine licensing and Environmental Impact Assessment regimes. The concerns raised stem from a thorough examination of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west side of the Isle of Lewis, the proposed development exists in an area characterised by its Atlantic-facing coastline, near-pristine natural environment, and a strong cultural identity.

The application lacks a solid evidential foundation necessary for lawful determination. There are critical gaps in environmental data, while the baseline information presented is both limited and inconsistent, leaving many key elements of the proposal undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, and the mitigation measures suggested remain unspecified, rendering their effectiveness unassessable. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Moreover, the proposal presents clear and substantive conflicts with policy. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements intended to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests needed for consent and undermine the authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, the reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and unfit for lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks comprehensiveness and fails to deliver a transparent and reliable account of the potential environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope,

which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty hampers the application of a worst-case scenario assessment and undermines the integrity of the evaluation, obscuring the actual environmental effects that may arise from the proposed development. Consequently, both the public and the competent authority are left without a clear understanding of the true extent of these effects.

Additionally, the application leans heavily on unestablished mitigation measures, monitoring strategies, and management plans. Seeking consent based on the premise that environmental harm will be mitigated in the future hinders any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the intention of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation be clearly established before any determination.

Furthermore, there are notable evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. Such deficiencies lead to uncertainty regarding the scale and significance of impacts, particularly when negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, contributing to scientific uncertainties that cannot align with statutory requirements.

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

Collectively, the reliance on an ambiguous design envelope, the lack of specified mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings prevent a lawful and rigorous assessment of environmental effects and leave the competent authority without the necessary information to make an informed determination regarding the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation concerning marine ecology and protected species is significantly inadequate, failing to deliver a thorough and trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This region represents a highly sensitive and biologically rich marine system; however, the existing baseline data remains incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of various species.

Consequently, the assessment lacks a solid evidential basis for assessing potential impacts.

A critical gap exists in the consideration of otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or evaluate their active utilisation of coastal areas for foraging and movement. The neglect to consider their core foraging ranges and behavioural patterns means that the potential impacts stemming from construction disturbances, noise, and increased activity have not been sufficiently assessed. This deficiency undermines any assertions regarding the lack of significant effects on this species.

Further shortcomings are noted in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, particularly when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to incorporate or adequately assess such data results in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

The methodological weaknesses highlighted mean that any conclusions regarding negligible or non-significant effects are based on assumptions rather than strong evidence. The lack of adequate baseline data further obstructs the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty created by these deficiencies prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thus necessitating the invocation of the precautionary principle. Under these circumstances, the granting of consent cannot be executed lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is recognised as a dynamic cultural landscape, where the interplay of environment, language, tradition, and community is vital. However, the current assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive perspective, treating heritage merely as isolated, static assets and 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 as static features, disregarding their continued use and the ramifications of development on their surroundings. This mischaracterisation leads to a flawed evaluation of cultural effects and ignores their integral role in community life.

Moreover, the application fails to consider intangible cultural heritage, including the Gaelic language and traditions that underpin the community's identity and its relationship with the coastal environment. These elements are notably absent from the assessment, representing a significant oversight. Without incorporating these factors, the full cultural impact of the development remains elusive.

Concerns extend to community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, yet the process of Free, Prior and Informed Consent has not been pursued. This lack of meaningful engagement diminishes the legitimacy of the assessment and does not align with established principles for participation in matters impacting cultural and environmental interests.

Additionally, there is a critical procedural oversight in the absence of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. This omission inhibits the competent authority's legal obligation to assess the social, cultural, and economic implications for the island community, resulting in a failure to meet statutory requirements.

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

Collectively, the lack of assessment for living heritage, intangible cultural values, community rights, and adherence to statutory mandates leads to a substantial evidential gap. Consequently, the cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the complete Social Impact Assessment fundamentally undermines the assessment of social impacts, health, and wellbeing. This lack of transparency represents a significant evidential gap, leaving both the public and the competent authority unable to grasp the full extent of the social risks identified through the developer's own research. Despite the commissioning of this assessment and focus groups with local residents, the absence of the full report limits scrutiny of its findings and hinders the determination of their relevance in the decision-making process.

Evidence suggests that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement rather than speculation; however, without access to the complete assessment, the seriousness of these effects cannot be appropriately considered. Furthermore, the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet, these significant 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, which is particularly concerning given the scale of the project. Such a lack of transparency compromises the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is vital when assessing developments that may alter community character and functionality. The failure to provide the full dataset results in an application that does not present a complete evidential basis for evaluating the balance between benefits and harm.

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

Moreover, the procedural ramifications are substantial. The competent authority is unable to perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment, marking a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime. The combination of non-disclosure of the full Social Impact Assessment and evidence of existing adverse impacts leads to an incomplete and unreliable assessment, obstructing a lawful determination and reinforcing the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not properly represent the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would establish a continuous industrial presence, significantly altering this character and leading to a permanent and irreversible change in the landscape.

There is also a lack of clarity in the application regarding the magnitude of the visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively impact visual amenity and diminish the essential qualities of naturalness and

remoteness. The assessment does not adequately convey the extent of this impact or its importance within such a sensitive landscape.

Methodological issues arise from the selection and presentation of visual viewpoints. It appears that the viewpoints may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This may lead to an understatement of the visual impact, which questions the reliability of the assessment.

Moreover, the assessment does not consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting, linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment overlooks their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and their connection to the natural horizon. This change is not merely a visual impact; it represents a broader cultural and spatial harm that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which seeks to protect natural areas and historic assets. The proposed scale of change is at odds with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes the argument for policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resulting changes are fundamental and permanent, rather than something that can be lessened to an acceptable degree through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The application proposes substantial seabed preparation and installation works in a high-energy Atlantic environment, but it lacks the necessary detail to assess potential environmental effects adequately. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, and it relies heavily on mitigation and contingency measures that would only be prepared after consent. This approach is particularly concerning given the sensitivity of the West Lewis coastline, which supports clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination.

The application acknowledges various risks, including sediment mobilisation and potential chemical or oil spills, yet it provides insufficient information on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty regarding the behaviour and scale of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to gauge the extent, duration, or ecological effects of such impacts, raising concerns about their implications for marine species and habitats that have already been identified as sensitive.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is granted, the application hinders an assessment of whether adequate safeguards are in place to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, this deferral of critical environmental safeguards conflicts with the stipulations of the Environmental Impact Assessment regime, which requires an assessment of likely significant effects and mitigation measures prior to granting consent. The absence of crucial information means that a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the shortcomings of not having defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts contribute to a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries related to this application lacks robustness and fails to address significant ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these vital habitats and uses can be preserved without considerable disruption.

A critical concern is the presumption that fishing activity can be moved without repercussions. The application does not provide any evidence that alternative fishing grounds are available, accessible, or capable of handling increased activity. This lack of information is crucial, as displacing fishing could lead to overfishing in other areas and may have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and local livelihoods cannot be accurately assessed.

Additionally, the proposal poses significant risks to marine species, particularly due to

the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to disturb a wide area, adversely affecting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises significant concerns, yet the application appears to minimise the importance of these effects without adequate supporting evidence.

There is a noticeable inconsistency in the application, as it acknowledges the necessity for licences to allow harm to European Protected Species while simultaneously stating that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially in light of anticipated harm that may require legal approval.

Moreover, the assessment neglects to address the cumulative impacts stemming from multiple pressures, such as habitat disruption, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It falls short of showing that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, obstructing any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is materially incomplete, failing to account for the full extent of impacts stemming from this single integrated project. The intrinsic link between the offshore turbines and the onshore works is overlooked, leading to a fragmented analysis that obscures the true scale of environmental and socio-economic effects.

Onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thus preventing a complete understanding of the project's overall environmental footprint.

The failure to address or defer the assessment of onshore impacts impedes a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all components of a project must be considered collectively; however, the

separation of offshore and onshore elements results in a lack of clarity regarding their combined impacts on peatlands, habitats, and communities.

Sensitive habitats, including machair systems and peatland environments that are under policy protection, face significant risks. The application does not provide evidence that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented, highlighting 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, which may create a carbon debt that contradicts the goals of renewable energy development. The application falls short of adequately addressing this issue or demonstrating that the overall carbon balance remains beneficial.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

There has been no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the local identity and to the developing sector of astro-tourism, this omission is particularly concerning. The lack of consideration for these factors highlights a clear gap in the overall assessment of landscape and environmental impacts.

Furthermore, the proposal does not address the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm

Petrel are particularly susceptible to artificial lighting, which can cause disorientation and increase the risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species, and the associated mortality risk, have not been evaluated.

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

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

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

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

TOURISM

The application presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscape, dark skies, and sense of remoteness. Although it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution from tourism.

Tourism has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application fails to model how the potential industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the region. In the absence of such analysis, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the evaluation overlooks the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for

visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the oversight in assessing tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The failure to provide a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been appraised as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to exhibit a net benefit. Furthermore, it conflicts with strategic objectives that recognise tourism as a priority growth sector, and it does not furnish adequate evidence to enable the competent authority to evaluate the economic consequences of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors that drive visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This limitation undermines the capacity for a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its failure to meet the requirements of sustainable development, which is evident when assessed against statutory duties, national policy, and evidential standards. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This new application, despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to provide a reliable evidential basis for determination.

Critical gaps in baseline data are evident throughout the application. It relies on an undefined design envelope, incorporates unspecified mitigation measures, and omits key impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is incomplete, failing to facilitate a comprehensive understanding of likely significant effects or residual impacts.

Moreover, there are procedural failings that further undermine the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment is a significant omission. These deficiencies obstruct the competent authority's ability to assess impacts on community wellbeing,

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

This proposal stands in direct opposition to the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural landscapes, or cultural heritage. The application 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 impacts of both offshore and onshore elements have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and could be significantly detrimental. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The vast information deficiencies, combined with conflicts with policy and unresolved environmental risks, obstruct any lawful, evidence-based decision-making process. Therefore, the competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to demand the submission of the missing information. A formal request is made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

I am writing to formally object to the proposed offshore wind farm development in this area, which I believe would cause significant and irreversible harm to an environment of exceptional natural beauty and ecological importance.

This stretch of coastline and its surrounding waters are not only visually stunning but also support a rich and thriving ecosystem. The area is home to diverse marine life and serves as an important habitat for seabirds, many of which rely on these waters for feeding, breeding, and migration. The introduction of large-scale industrial infrastructure into this sensitive environment risks disrupting these natural patterns, with potentially severe consequences for biodiversity.

The visual impact of such a development should not be underestimated. The open seascape currently offers an unspoiled horizon that contributes greatly to the character of the area. The presence of numerous large turbines would fundamentally alter this

landscape, diminishing its natural appeal and affecting the experience of residents and visitors alike.

In addition to ecological and visual concerns, there are potential cumulative impacts that must be carefully considered. Noise, increased vessel traffic, and construction activity could disturb marine mammals and fish populations, while turbine operation poses collision risks for birds and bats. These effects may not be immediately reversible and could extend far beyond the construction period.

While I recognise the importance of renewable energy in addressing climate change, it is essential that such developments are appropriately sited. Locations of high environmental sensitivity and outstanding natural beauty should be afforded greater protection, and alternative sites with lower ecological and visual impact should be prioritised.

For these reasons, I strongly urge the decision-makers to reject this proposal or, at the very least, to undertake a far more rigorous assessment of its environmental consequences and explore less damaging alternatives.

Thank you for considering my objection.

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: D6C5B187

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application 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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented fails to adequately recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. Rather than appreciating the dynamic social, cultural, and spiritual roles that heritage plays, the application reduces heritage to isolated, static elements, overlooking their ongoing significance within the community.

A notable shortcoming is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites of burial and spiritual practice. The assessment incorrectly categorises these as static features, neglecting their continuous use and the implications of development on their surrounding environment. This misunderstanding leads to an incomplete appraisal of cultural effects, disregarding their integral part in community life.

The absence of consideration for intangible cultural heritage, which encompasses the Gaelic language, traditions, and the community's enduring connection to the coastal environment, further compounds these issues. These aspects are vital to the area's identity yet are entirely overlooked in the assessment, representing a considerable gap. Without addressing these essential elements, the true cultural impact of the development remains misunderstood.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population, which embodies a distinct cultural identity akin to that of Indigenous Peoples, has not been involved in a Free, Prior and Informed Consent process. This lack of genuine engagement calls into question the validity of the assessment and neglects established principles that govern participation in matters affecting cultural and environmental interests.

Moreover, a critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment prevents the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

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

Ultimately, the disregard for living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently assessed, and the application lacks the necessary foundation for an accurate evaluation of the genuine cultural cost associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

within such a sensitive landscape context.

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

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

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the preservation of natural spaces and historic assets. The proposed changes are incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate the likely environmental effects. The application does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on mitigation and contingency measures that are to be prepared post-consent. This approach inhibits any meaningful assessment of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures raises serious concerns. The West Lewis coastline is known for its clean coastal waters and vital habitats, which are particularly vulnerable to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate information on how these will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application hinders the evaluation of whether appropriate safeguards are established to address pollution events. This not only introduces procedural risk but also undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contravenes the requirements set forth by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed prior to consent, and the absence of such information prevents a lawful determination from being made. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries lacks the necessary depth to evaluate ecological or socio-economic impacts properly. The waters off the West Lewis coast contain a rich marine ecosystem and a vital fishing industry. However, the application does not demonstrate how these important habitats and uses can be protected or preserved without causing significant disruption.

A major concern lies in the assumption that fishing activities can be moved without negative consequences. The application fails to provide any evidence that alternative fishing grounds are viable, accessible, or able to support increased pressure. This lack of information is critical, as displacing fishing efforts could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. The absence

of a clear, evidence-based assessment means that the effects on fisheries and livelihoods remain unclear.

The proposal also poses considerable threats to marine species, especially due to the underwater noise from construction activities. The prolonged use of high-energy hammer piling is expected to disturb marine life over extensive areas, particularly affecting species such as dolphins. Concerns arise regarding the anticipated disturbance to a large portion of the local bottlenose dolphin population, but the application minimizes these impacts without adequate supporting evidence.

Moreover, the application acknowledges the necessity of licences to allow harm to European Protected Species, while at the same time claiming that the impacts are negligible. This contradiction weakens the credibility of the assessment and raises compliance issues with the Habitats Regulations, especially where harm is expected to an extent that requires legal permission.

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

From a policy standpoint, the application does not prove adherence to National Planning Framework 4 or the National Marine Plan. It does not establish that the development can exist alongside current marine users or prevent unacceptable impacts on marine biodiversity, hindering the ability to conclude that the proposal represents sustainable development.

Overall, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment render it incomplete and unreliable. These shortcomings inhibit a comprehensive evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include an assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that will be visible from long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This will fundamentally change the night-time environment.

There is no evaluation of the lighting's impact on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important because dark skies are crucial to the area's identity and are becoming increasingly relevant to tourism sectors like astro-tourism. The lack of consideration for these impacts represents a

clear gap in the environmental and landscape assessment.

Moreover, the application fails to assess the effects of lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting, which can lead to disorientation and a higher risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species and the risk of increased mortality remain unexamined.

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

Without assessing nocturnal effects, it is impossible to determine if protected species or designated sites will be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be achieved. This engages the precautionary principle and hinders a lawful determination.

From a policy perspective, the absence of this assessment conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also affects the overall evaluation of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

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

TOURISM

The application presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the Isle of Lewis has experienced considerable growth, with its value rising from £65 million in 2017 to over £81.5 million. This sector supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application does not model the potential impacts of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added or broader economic resilience. This lack of analysis raises questions about whether the development could deliver a net economic benefit or instead undermine an established and flourishing sector.

Furthermore, the assessment does not take into account the role of environmental quality in promoting tourism. The importance of unspoiled landscapes and dark skies for visitor experiences, alongside emerging markets such as nature-based tourism and astro-tourism, is overlooked. The absence of a Dark Skies Assessment further accentuates this shortcoming, creating a significant gap in understanding the impacts on a recognised and expanding component of the local economy.

In an island community characterised by limited economic diversification, the failure to assess tourism impacts carries broader implications for employment, local businesses, and community sustainability. The lack of 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 compliance with National Planning Framework 4, especially regarding economic impact and the requisite to exhibit net benefit. It also conflicts with strategic objectives that prioritise tourism as a growth sector, providing insufficient evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the combination of inadequate quantification of tourism impacts, the failure to assess environmental factors influencing visitor behaviour, and a disregard for the island's economic dependency culminates in a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and supports the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm does not meet the requirements for sustainable development according to statutory obligations, national policy, and evidential standards. It raises similar concerns to those that resulted in the refusal of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable scale of industrialisation. This current application comes under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidence provided for this application. It lacks comprehensive baseline data and continues to employ an undefined design envelope. Mitigation measures have not been clearly outlined, and key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, failing to clarify likely significant effects or residual impacts.

Procedural shortcomings are also apparent. The missing Island Communities Impact Assessment violates the statutory duty under the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment further complicates matters. These issues hinder the competent authority's ability to assess effects on community wellbeing,

cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal contradicts the National Planning Framework 4 by not adequately protecting biodiversity, natural areas, 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. Moreover, the cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

There are uncertainties regarding environmental risks that could 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 regarding acceptable impacts.

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

In summary, the application is unfit for determination both procedurally and substantively. The lack of information, combined with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent for this application or invoke the appropriate regulatory provisions to obtain the missing information.

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

Additional Comments

WE ARE SEEING MORE AND MORE OF THESE HORRIBLE WINDMILLS GOING UP and the electric costs have also gone up, we have the dearest electric in the modern world, something is seriously wrong. So what is the ACTUAL point in these stupid things?

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: 5FDD7C17

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

Dear Sir/Madam

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

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

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

The unprecedented scale of the proposal, involving large turbines in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ASSESSMENT OF ALTERNATIVES

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the application fails to acknowledge this connection and instead adopts a simplistic view of cultural heritage as isolated, static assets, disregarding their vital social, cultural, and spiritual roles within the community.

A notable shortcoming is the treatment of important cultural sites such as 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 ongoing use and the significance of their settings. This misrepresentation leads to an incomplete understanding of the cultural effects of development, failing to respect their importance in community life.

Moreover, the assessment does not take into account intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are crucial to the area's identity and are glaringly absent from the assessment, which is a significant oversight. Without evaluating these aspects, the cultural impact of the proposed development remains inadequately understood.

Concerns also arise around community rights and engagement. The Gaelic-speaking community possesses a unique cultural identity with attributes that align with those of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to honour established principles regarding participation in decisions that affect cultural and environmental interests.

A major procedural flaw is the absence of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The oversight of both tangible and intangible heritage, along with the neglect of living cultural practices, represents a clear deviation from policy expectations.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and legal obligations leads to a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and as such, the application fails to provide a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposal. Although the developer engaged with local residents through focus groups, the complete report remains unpublished. This evidential gap impedes both public understanding and the competent authority's ability to assess the full extent of social risks identified in the developer's own research.

Available summaries reveal that residents are already facing measurable stress,

anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts are based on direct engagement rather than speculation. Nonetheless, the absence of the full assessment restricts proper scrutiny of the findings and hinders the determination of their significance in the decision-making process.

Moreover, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with references to “cultural loss” appearing in the developer’s findings. However, these impacts have not been adequately reflected in the main application or assigned appropriate weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This situation adversely affects the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be at risk. By failing to provide the complete dataset, the application lacks a solid evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is imperative that developments promote positive health outcomes and mitigate harm; however, the evidence presented indicates existing adverse effects that remain inadequately disclosed. Without access to the complete assessment, demonstrating compliance with this policy becomes impossible.

The procedural implications of this situation are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment, marking a material omission within the application that fails to meet the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines in proximity to the shoreline would impose a continuous and prominent industrial presence, leading to a fundamental change in this character and resulting in an irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts does not adequately represent the scale of this change or consider the sensitivity of the receiving environment.

The visual implications of the proposed turbines are significant, as their scale and

proximity would dominate views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not accurately convey the extent of this impact, nor its significance in the context of such a sensitive landscape.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This creates a risk that the visual impact has been understated, calling into question the reliability of the assessment.

Moreover, the assessment inadequately considers the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, interconnected through visual and spatial relationships with the Atlantic horizon. By treating these assets in isolation, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape threatens to sever these connections, altering the context in which these heritage assets are experienced and disrupting their link to the natural horizon. This not only poses a visual impact but also inflicts broader cultural and spatial harm that the application has not properly assessed.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which seeks to protect natural places and historic assets. The proposed scale of change is incompatible with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking. There are no fully developed Construction Environmental Management

Plans or Pollution Prevention Plans, as the application depends on mitigation and contingency measures that will be prepared after consent. This reliance on undefined future measures raises concerns, especially given the sensitivity of the receiving environment. The West Lewis coastline has clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination.

The application notes risks such as sediment mobilisation and accidental chemical or oil spills but does not adequately detail how these risks will be prevented, controlled, or monitored. Additionally, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, including the potential effects on sensitive marine species and habitats.

Furthermore, the absence of detailed emergency response procedures adds to these issues. By postponing contingency planning until after consent, the application limits the evaluation of whether adequate safeguards are in place to manage pollution events. This approach introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of critical environmental safeguards goes against the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and the absence of such information means a lawful determination cannot be achieved. The application does not demonstrate compliance with the policy requirements concerning environmental protection and water quality. Overall, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainty about potential impacts make the assessment materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and indicate that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is significantly lacking, failing to account for the full range of impacts associated with what constitutes a singular integrated project. The offshore turbines and onshore works are interconnected; however, they are evaluated independently. This fragmented approach obscures the comprehensive scale of the environmental and socio-economic repercussions.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon store and is an ecologically delicate habitat. The application does not offer a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application impedes a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively, yet the disconnection between offshore and onshore elements results in a lack of clarity regarding the combined effects on peatlands, habitats, and local communities. There are also considerable threats to sensitive habitats, including machair systems and peatland environments, which are designated for policy protection. The application fails to show that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented, revealing a significant evidential gap regarding biodiversity protection.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, prompting concerns over deliverability and lawful execution. From a policy standpoint, the inability to assess the project comprehensively and to illustrate the protection of peatlands, habitats, and land use interests stands in contradiction to the National Marine Plan and National Planning Framework 4. The lack of demonstration that impacts can be avoided or mitigated further undermines the credibility of the application.

Overall, the separation of project elements, the absence of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, thereby obstructing a lawful determination.

TOURISM

The assessment regarding the impacts on tourism is fundamentally inadequate, neglecting to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis. Tourism is intrinsically linked to the region's wild coastline, nearly untouched landscapes, dark skies, and the feeling of remoteness. While the application recognises that 86% of visitors are motivated by the scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or the overall economic contribution.

This sector has seen considerable growth, with revenues rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and making up approximately 16% of the island's economy. However, the application does not model the potential effects of seascape industrialisation and environmental degradation on Tourism Gross Value Added or the broader economic resilience. Such an absence of analysis means it is impossible to ascertain whether the development would offer a net economic advantage or jeopardise an established and flourishing sector.

The evaluation also overlooks the significance of environmental quality in sustaining tourism, failing to recognise how unspoiled landscapes and dark skies enhance visitor experiences and contribute to burgeoning markets such as nature-based tourism and astro-tourism. Furthermore, the lack of a Dark Skies Assessment exacerbates this

shortcoming, resulting in a considerable oversight regarding the impact on a recognised and expanding segment of the local economy.

In a community with limited economic diversification, neglecting the impact on tourism has broader implications for employment opportunities, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been appropriately examined, as required 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 net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to furnish enough evidence for the competent authority to evaluate the economic ramifications of the proposal.

The combined shortcomings in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and acknowledging the island's economic dependence create a significant gap in evidence. This deficiency hinders a thorough assessment of economic effects, leading to the conclusion that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Currently, it is being assessed under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for this application. It is marked by critical gaps in baseline data, the continued use of an undefined design envelope, and an overreliance on unspecified mitigation measures. Additionally, important impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have been neglected. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment is a significant omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

This proposal contradicts National Planning Framework 4. It does not demonstrate

adequate protection for biodiversity, natural places, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative impact of both offshore and onshore elements has not been adequately evaluated, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially considerable. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent within their own findings. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, engaging the precautionary principle and precluding any lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, coupled with conflicts with policy and unresolved environmental risks, inhibit a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke the pertinent regulatory provisions to request the submission of the necessary missing information.

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

Additional Comments

As a chartered project management surveyor with over 20 years in delivering multi million pound development projects in the Highlands and Islands, supporting economic development and improving public infrastructure, this proposal is an oddity in the extreme. The local economic benefits will be extremely minimal and modest relative to the scale and irreversible negative impact (environmental, visual, cultural) of the development. The Scottish Government, Local Authority and Developer are seriously misreading the room if they consider this project will be welcomed by the Westside community (Uig to Ness). Opportunities surely abound for other development sites that will not attract the same level of opposition locally.

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: 987D944B

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 regulations. The objection arises from an analysis of the Environmental Impact Assessment Report and accompanying documentation, highlighting several significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural issues. Situated off the west coast of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns have been raised regarding the compatibility of the proposal with statutory requirements, national policy, and sustainable development principles, particularly given its scale, proximity to the shore, and design.

The application lacks a solid evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Many key aspects of the proposal are left undefined. The application's flexible design framework inhibits a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed view of the potential environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects are not backed by adequate evidence.

Policy conflicts are evident and substantial. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not adequately demonstrate that the national requirements for protecting biodiversity, climate interests, and environmental integrity can be satisfied. These discrepancies directly impact the statutory tests necessary for consent and hinder the competent authority's ability to deem the development acceptable under policy terms.

The unprecedented scale of this proposal raises additional issues, as large turbines are planned to be positioned in close proximity to the shoreline, introducing serious concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be invoked.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to adequately assess alternatives, resulting in a significant shortcoming in meeting the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental impacts, the application presents a narrative describing the evolution of the project. This approach does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Moreover, there is a notable lack of transparency and evidence regarding the comparison of alternative offshore locations, development scales, or design configurations. In particular, the application does not indicate that the developer has genuinely considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore when evaluating impact, makes this absence of analysis particularly significant. Therefore, it cannot be concluded that the proposed siting represents the least damaging option.

These deficiencies also encompass the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been adequately examined to prevent or minimise impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis imply that mitigation by design has not been implemented, resulting in reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a thorough alternatives assessment, it is not possible to determine that the proposal is sustainable or complies with relevant policies.

From a policy perspective, this deficiency undermines compliance with 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 constitutes a material omission that ultimately leads to the conclusion that the application has not been adequately evaluated and cannot facilitate a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity surrounding the proposed development is severely lacking. It fails to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community intertwine. Instead, the application takes a simplified view, treating heritage as a collection of static assets rather than acknowledging their ongoing social, cultural, and

spiritual roles within the community.

Notably, the assessment inadequately addresses culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places for burial and spiritual practice, yet they are portrayed as static features, overlooking their current usage and the development's impact on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural effects and ignores their importance in community life.

The application also disregards intangible aspects of cultural heritage, such as the Gaelic language and local traditions. These components are essential to the identity of the area, yet they are notably absent from the assessment, marking a significant oversight. Without evaluating these factors, it becomes impossible to fully grasp the cultural implications of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community has a distinct 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 calls into question the legitimacy of the assessment and fails to comply with established participation principles for decisions affecting cultural and environmental interests.

A critical procedural gap exists due to the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone is sufficient to hinder a lawful determination.

From a policy standpoint, these shortcomings directly conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, represents a significant departure from policy requirements.

Overall, the inadequacies in assessing living heritage, intangible cultural value, community rights, and legal obligations create a substantial evidential gap. The cultural impacts of the development remain unassessed, and the application fails to offer a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of health, wellbeing, and social impacts associated with the development is fundamentally flawed and lacks the necessary transparency for a lawful appraisal. Although the developer commissioned a Social Impact Assessment, which included engagement with local residents, the complete report remains unpublished. This creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the full range of social risks highlighted in the developer's research.

Summaries available suggest that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed project. These impacts stem from direct interactions and are therefore based on actual experiences, rather than assumptions. However, the absence of the full assessment limits the scrutiny of these findings and restricts the capacity to evaluate their significance in the decision-making process.

Furthermore, there is substantial evidence indicating that the proposal is seen as a direct threat to community identity and cohesion, with findings from the developer highlighting "cultural loss." Despite this acknowledgment, the impacts have not been adequately incorporated into the primary application or assigned appropriate importance. The failure to disclose the entire Social Impact Assessment clouds the true human and social costs associated with the development.

This lack of transparency further compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is vital for projects of this magnitude, especially when community dynamics may be influenced. By withholding the complete dataset, the application does not offer a comprehensive evidential foundation for weighing the benefits against potential harm.

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

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

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing negative impacts, results in an incomplete and unreliable evaluation. This deficiency precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the seascape, landscape, and visual impacts is significantly inadequate, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, possesses a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would impose a continuous industrial presence that fundamentally alters this unique character, leading to a permanent and irreversible transformation of the landscape.

The application lacks an adequate representation of the magnitude of the visual changes that would occur. The size and proximity of the turbines would dominate views from residential areas, historical sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of these impacts within the context of such a sensitive landscape.

Moreover, there are serious concerns regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impacts have been underestimated, which further compromises the validity of the assessment.

A critical shortcoming is the failure to recognise the interconnected relationship between the landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework, connected visually and spatially to the Atlantic horizon. The assessment approaches these heritage assets as isolated entities, neglecting their interdependence and leading to an incomplete evaluation of the impacts on their context and cultural significance.

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

From a policy perspective, the proposal is at odds with National Planning Framework 4, which seeks to protect natural places and historic assets. The anticipated scale of change is inconsistent with the need to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any claims of compliance with policy requirements.

It is also evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in an unavoidable and dominant presence. The changes involved are fundamental and permanent, rather than reducible to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately reflect the extent of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application presents a number of critical deficiencies that undermine its reliability regarding the assessment of fisheries and marine life. It fails to provide a comprehensive evaluation of the ecological and socio-economic impacts associated with the proposal. The waters off the West Lewis coast are home to both a thriving marine ecosystem and an active fishing industry, yet the application does not demonstrate how these essential uses and habitats will be preserved or maintained without significant disruption.

A major concern arises from the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to support the availability and accessibility of alternative fishing grounds that could withstand any additional pressure. This significant omission raises the risk of overfishing in other areas, which may lead to wider economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the true impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise resulting from construction activities. The use of high-energy hammer piling over an extended period threatens to disturb marine life across considerable distances, particularly affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application minimises the importance of these effects without adequate supporting evidence.

There is also a notable inconsistency within the application, as it acknowledges the need for licences to permit harm to European Protected Species while concurrently describing the anticipated impacts as negligible. This contradiction raises serious questions about the credibility of the assessment and its alignment with the Habitats Regulations, especially in cases where anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to address cumulative impacts from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without an in-depth examination of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with the 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 effects on marine biodiversity, thereby preventing any conclusion that the proposal aligns with the principles of sustainable development.

In summary, the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment inadequate and untrustworthy. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

TOURISM

The assessment of the potential impacts on tourism is severely lacking, overlooking crucial economic and social implications for a vital sector of the Isle of Lewis economy. The economy here relies heavily on tourism, which thrives on the area's wild coastline, almost untouched landscapes, dark skies, and overall sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, the application fails to provide a quantitative analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviours, or the overall economic contributions of tourism.

Tourism has experienced substantial growth, escalating from £65 million in 2017 to more than £81.5 million, thereby supporting over 1,000 jobs and making up to 16% of the island's economy. Nonetheless, the application neglects to explore how the anticipated industrialisation of the seascape and subsequent decline in environmental quality could affect Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains unclear whether the proposed development would yield a net economic benefit or risk undermining a vital and expanding sector.

Furthermore, the assessment inadequately addresses the significance of environmental quality in nurturing tourism, particularly highlighting how unspoiled landscapes and dark skies enhance visitor experiences and promote emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the impacts on a recognised and growing segment of the local economy.

Within the context of an island community that has limited economic diversification, the failure to properly evaluate tourism impacts raises broader concerns 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 duly assessed, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, especially regarding economic impacts and the necessity of illustrating net benefits. It also contradicts strategic objectives that classify tourism as a priority growth sector and lacks sufficient evidence for the competent authority to gauge the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependency leads to a significant evidential gap. This omission hampers a thorough evaluation of economic effects, supporting the conclusion that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal signifies a significant shortfall in meeting the standards of sustainable development when evaluated against statutory

obligations, national policy, and required evidence. This application reiterates the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable level of industrialisation. Now, it is introduced under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and the wellbeing of communities.

There are critical deficiencies in the evidential foundation provided for the determination of the application. Key baseline data is missing, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Additionally, the application neglects crucial impact pathways related to nocturnal wildlife, comprehensive onshore infrastructure, and potential effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set forth by the Islands (Scotland) Act 2018. Furthermore, the incomplete Social Impact Assessment represents a significant omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic stability, rendering the application unsuitable for determination.

The proposal stands in stark contradiction to the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural areas, and cultural heritage. There is insufficient evidence to confirm that impacts on health and wellbeing are acceptable, nor can it substantiate a net economic benefit, largely due to the absence of tourism impact analysis. Moreover, the cumulative effects of both offshore and onshore components have not been adequately evaluated, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks remain considerable. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The required evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful determination of acceptable impacts.

This proposal would bring about significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the potential repercussions for tourism represent enduring effects that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unsuitable for determination. The extensive deficiencies in information, combined with conflicts with policy and unresolved environmental concerns, inhibit a lawful, evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to require the submission of the

outstanding information.

For these reasons, 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: 890275C2

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment considerations. A thorough review of the Environmental Impact Assessment Report and accompanying documents reveals serious deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west coast of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, relatively untouched environment, and strong cultural significance. The proposal's scale, design, and proximity to the shore raise profound concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation necessary for a lawful decision. Essential environmental data is absent, baseline information is inconsistent and limited, and numerous critical elements of the proposal remain unspecified. Furthermore, the reliance on a flexible design framework hinders a clear assessment of potential significant effects, while the unspecified mitigation measures mean their effectiveness cannot be judged. Consequently, the documentation fails to offer a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

Additionally, there are significant conflicts with existing policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately show that national standards for protecting biodiversity, climate interests, and environmental integrity can be upheld. These conflicts directly challenge the statutory tests for consent and weaken the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposed development, with large turbines situated close to the coastline, raises urgent concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations indicates that the application is incomplete and incapable of sustaining a lawful decision. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is significantly lacking and fails to provide a complete, transparent, or reliable account of the potential environmental

effects associated with the proposal. The adoption of a flexible Project Design Envelope, without fixed commitments to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and hampers the ability to apply a worst-case scenario consistently. This situation undermines the integrity of the assessment, obscuring the true extent of environmental effects from both the public and the competent authority.

The application significantly depends on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Consequently, consent is sought on the premise that environmental harm will be mitigated at a later stage, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be established clearly prior to determination.

Furthermore, there are notable evidential shortcomings, including insufficient baseline data, methodological limitations, and an over-reliance on assumptions in lieu of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, including stipulations concerning 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 undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and comprehensive assessment of environmental effects and leave the competent authority unable to make a determination based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species exhibits significant deficiencies, failing to deliver a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is biologically active and highly sensitive, yet the baseline data remains incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat utilisation of key species, undermining the evidential basis for evaluating impacts.

One notable oversight pertains to otters, classified as a European Protected Species. The application does not adequately recognise or assess their use of coastal areas for foraging and movement. The absence of an evaluation of their core foraging range and behavioural patterns results in a failure to adequately consider the potential effects of construction disturbance, noise, and increased activity, thereby undermining conclusions regarding the absence of significant effects on this species.

Further weaknesses appear in the assessment of basking sharks, with a reliance on aerial surveys that introduce significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. Neglecting to incorporate or properly assess such data results in an incomplete baseline, consequently weakening the reliability of the presented conclusions.

These methodological shortcomings render the conclusions of negligible or non-significant effects reliant on assumptions rather than robust evidence. The lack of sufficient baseline data obstructs meaningful evaluation of cumulative and indirect impacts, which includes considerations for seasonal variation and broader ecosystem interactions. This uncertainty complicates understanding the true scale of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts related to the proposed development is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. It is crucial to note that 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 fails to provide adequate evidence to demonstrate that these species will not be adversely affected. Additionally, the development is situated within key foraging areas and migratory pathways, yet there is a lack of robust evaluation regarding the implications of displacement, collision risk, or habitat loss.

Within the application lies a fundamental contradiction. The developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that the conclusions presented lack support from the underlying evidence. The assessment does not sufficiently address whether seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these vital feeding grounds is not fully considered, and reliance on modelling methods introduces uncertainty, particularly for species experiencing severe decline, such as Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates, especially when baseline data is incomplete and behavioural responses remain inadequately understood.

Moreover, the placement of turbines within a recognised migratory corridor introduces a substantial risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. There is an inadequate assessment of the long-term implications of continued mortality within this corridor, as well as the potential effects on species with relatively small global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and precludes a lawful conclusion that would support consent.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage related to the proposed development is fundamentally flawed, particularly regarding the West Lewis coastline, which should be recognised as a vibrant cultural landscape where community, tradition, language, and environment are deeply intertwined. The application reduces heritage to mere static assets, neglecting their active social, cultural, and spiritual relevance within the community.

Significantly, the assessment fails to accurately address culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely historical features; they serve as active sites for burial and spiritual activities. By

classifying them as static, the evaluation overlooks their ongoing significance and the implications of development on their surroundings. This misrepresentation leads to a lack of thorough analysis concerning cultural effects and dismisses their importance in community life.

Moreover, the application neglects the evaluation of intangible cultural heritage, which encompasses the Gaelic language, traditional practices, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity yet are completely omitted from the assessment, marking a crucial gap. Without accounting for these elements, a true understanding of the cultural impact of the development remains unattainable.

Concerns regarding community rights and engagement also arise. The Gaelic-speaking community possesses a unique cultural identity as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to uphold established principles for participation in decisions that affect cultural and environmental interests.

A crucial procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority's ability to lawfully assess the social, cultural, and economic implications of the proposal on the island community. This alone renders a lawful determination impossible.

These inadequacies place the proposal in clear opposition to the National Planning Framework 4, especially regarding the protection of historic assets and sites. By neglecting both tangible and intangible heritage and failing to recognise living cultural practices, the application diverges significantly from policy expectations.

Overall, the failure to adequately assess living heritage, intangible cultural values, community rights, and statutory responsibilities results in a considerable evidential gap. The cultural implications of the development remain improperly evaluated, and the application does not provide a sound foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency surrounding the assessment of social impacts, health, and wellbeing is critically lacking, which raises serious concerns about the validity of the evaluation process. Although the developer engaged local residents through a Social Impact Assessment and conducted focus groups, the absence of the complete report creates a substantial evidential gap. This lack of disclosure hinders both public understanding and the ability of the competent authority to fully grasp the social risks highlighted by the developer's own research.

Residents are reportedly enduring measurable stress, anxiety, and concern due to the scale and proximity of the proposed development, as derived from direct engagement

rather than speculation. However, without the full assessment being made public, it becomes difficult to scrutinise these findings effectively and assess their significance in the context of the decision-making process.

Moreover, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with the potential for “cultural loss” noted in the developer’s findings. Despite these serious implications, they have not been adequately integrated into the primary application or given the necessary weight in consideration. The failure to release the complete Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency has broader implications for the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may alter community character and functioning. By withholding the full dataset, the application does not furnish a complete evidential basis to evaluate the balance between potential benefits and harm.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and avoid inflicting harm, yet the evidence that is available points to existing adverse effects that have not been fully revealed. In the absence of the full assessment, it is impossible to demonstrate compliance with this policy.

Procedurally, these concerns are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission in the application and fails to meet the evidential requirements set by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse effects, results in an incomplete and unreliable assessment. This situation impedes a lawful determination and underscores the conclusion that the application lacks sufficient information to warrant support.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in the assessment of seascape, landscape, and visual impacts, which do not adequately capture the scale of change or the sensitivity of the receiving environment. The character of the West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would result in a dominant industrial presence, fundamentally transforming this character and leading to a permanent alteration of the landscape.

Furthermore, the application fails to accurately convey the magnitude of the

anticipated visual change. The scale and proximity of the turbines would overshadow views from residential areas, historic sites, and frequently visited coastal locations, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently articulate the significance of this impact within such a sensitive landscape.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints considered may not adequately represent the most sensitive receptors or the most severe scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises concerns that the extent of visual impact has been downplayed, thereby compromising the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context connected by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these sites as isolated entities, failing to acknowledge 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 vital relationships, altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This alteration represents not merely a visual impact but a more profound cultural and spatial detriment that remains inadequately addressed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The extent of the proposed changes is inconsistent with the requirement to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a rigorous worst-case scenario assessment further erodes any assertion of compliance with policy.

Moreover, 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 inescapable. The resultant change is therefore fundamental and permanent, rather than something that could be rendered acceptable through mitigation measures.

In conclusion, the assessment inadequately reflects the magnitude of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage. These shortcomings preclude a reliable evaluation and underscore the position that the proposal is at odds with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's evaluation of construction and pollution risks lacks comprehensiveness, preventing a thorough assessment of its likely environmental impacts. It entails significant seabed preparation and installation works in a challenging Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated after consent is granted, which hinders any meaningful appraisal of their effectiveness.

This reliance on unspecified future measures raises serious concerns, especially given the sensitivity of the receiving environment. The coastline of West Lewis features clean coastal waters and vital habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks like sediment mobilisation and possible chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies for these risks.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. In the absence of robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty similarly extends to potential repercussions for sensitive marine species and habitats already noted in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable measures exist to address pollution incidents. This not only introduces procedural risks but also undermines the competent authority's capacity to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the obligations set forth by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to granting consent, and without this essential information, a lawful decision cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation strategies, insufficient detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These shortcomings hinder a rigorous evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting would create

a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This is particularly important given the relevance of dark skies to the area's identity and the growth of sectors such as astro-tourism. The lack of consideration for these impacts highlights a major deficiency in the overall landscape and environmental assessment.

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, which can cause disorientation and increase the risk of collision. The application does not provide a lighting impact assessment or a study on phototaxis, leaving a crucial gap in understanding how aviation lighting might impact these species and their mortality rates.

The reliance on daytime survey data in the ornithological assessment further complicates the issue, as it does not account for nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unexamined. The lack of specific night-time data is a critical oversight in understanding ecological impacts.

Without assessing nocturnal impacts, it cannot be determined whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful decision.

From a policy standpoint, this omission conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also detracts from the broader evaluation of landscape and seascape impacts, as the character of night-time is an integral element of the environment.

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

TOURISM

The assessment of tourism impacts presents significant deficiencies and does not adequately consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. Given the reliance of tourism on the area's wild coastline, nearly pristine landscapes, dark skies, and sense of remoteness, this oversight is particularly concerning. The application states that 86% of visitors are attracted by scenery, yet it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

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

Moreover, the assessment neglects the significance of environmental quality for tourism, especially the value of unspoiled landscapes and dark skies to visitor experiences, including growing markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this gap, leaving a considerable lack of understanding regarding impacts on an acknowledged and burgeoning segment of the local economy.

In the context of a community on an island with limited economic diversification, the lack of assessment regarding tourism impacts carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated as mandated under 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 requirement to show a net benefit. Furthermore, it conflicts with strategic objectives that recognise tourism as a priority growth sector and fails to supply sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing the environmental factors driving visitor behaviour, and recognising the island's economic dependency culminate in a significant evidential gap. This ultimately hinders a robust assessment of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a failure to meet the standards of sustainable development. This proposal does not address the statutory duties, national policy, or evidential standards required. It echoes the issues from the 2008 refusal of the Lewis Wind Power proposal, as the industrial scale remains unacceptable. Although the current application falls under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still lacks necessary support.

Significant gaps in baseline data are evident, alongside the use of an undefined design envelope. There is an overreliance on unspecified mitigation measures, and essential impact pathways are omitted. This includes nocturnal wildlife, full onshore

infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are present as well. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018. Furthermore, not disclosing the full Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

Additionally, the proposal conflicts with National Planning Framework 4. It does not sufficiently protect biodiversity, natural places, or cultural heritage. There is a lack of evidence showing that health and wellbeing impacts are acceptable, and it fails to demonstrate a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts from offshore and onshore components have not been accurately assessed, leaving the effects on peatlands, carbon balance, habitats, and crofting land unclear.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to rule out adverse effects has not been achieved, invoking the precautionary principle and hindering lawful conclusions regarding acceptable impacts.

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

Considering these issues, the application is procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks prevents a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or exercise regulatory provisions to demand the missing information.

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

Additional Comments

I live in direct line of sight of Shawbost beach; my greatest concern is the strobing affect of multiple wind turbines across the landscape and through most windows of our house with the setting sun in the summer months. My husband has epilepsy. I have light sensitivity issues. The West/North West of us is currently a wonderful dark-sky environment for Northern Lights and Star Gazing; which would be forever changed. Reportedly sea-birds such as puffins are at risk from the blades.

Basking shark frequent the bay.

The tides are relatively safe for swimming, which may be impacted by the turbines.

I'm concerned for the lights and movement produced by the turbines; by the unknown affects on health; by the distress the thought of the farm I'm experiencing. I'm fearful of impacts to house-prices, tourism, well-being.

I am wholly unsupportive of the plans.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 429554E9

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 Environmental Impact Assessment Report presents significant deficiencies and fails to deliver a full, transparent, or reliable account of the expected environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This approach compromises the integrity of the assessment, making it impossible for the public and competent authorities to fully understand the potential environmental impacts of the development, as the effects outlined may not accurately reflect what will ultimately be constructed.

Furthermore, the application relies on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be mitigated at a later date prevents a meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally inappropriate and contradicts the core objective of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

There are also notable evidential gaps, including inadequate baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that conflicts with statutory requirements.

Consequently, the application fails to satisfy the evidential standard stipulated under the Habitats Regulations, which aims to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are implemented.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based assessment of alternatives, which is a significant shortcoming in relation to the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a clear

comparison of realistic alternatives based on their environmental impacts, it presents a narrative account of project evolution. This narrative does not adequately demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

Moreover, there is no transparent evaluation of alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, which could potentially mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining impact further highlight the need for such an analysis. Without it, there can be no conclusion that the proposed siting is the least damaging option available.

The inadequacies also extend to cable routing and landfall assessments, where there is a lack of sufficient evidence demonstrating that alternative routes have been explored to avoid or minimise impacts on sensitive receptors. This includes consideration of areas with cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been implemented, leading to an over-reliance on post-design mitigation measures.

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

From a policy standpoint, these deficiencies undermine 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 omission, contributing to the overall conclusion that the application has not been adequately assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in its assessment of marine ecology and protected species, failing to establish a complete and reliable understanding of ecological receptors within the West Lewis coastal environment. The marine system in question is notably sensitive and biologically active; however, the baseline data provided is incomplete, and the methodologies employed do not effectively capture essential information regarding species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A critical oversight involves otters, which are classified as a European Protected

Species. The application does not adequately recognise or assess the active use of coastal areas by otters for foraging and movement. This gap in consideration of their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity remain inadequately evaluated. As a result, conclusions drawn regarding the absence of significant effects on otters are undermined.

Further issues arise in the assessment of basking sharks. The reliance on aerial surveys leads to a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks when compared with established land-based observations, which indicate that these waters are frequently utilised by the species. The failure to incorporate or adequately address such data contributes to an incomplete baseline and further undermines the reliability of the conclusions reached.

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

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it 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 necessitating the application of the precautionary principle. Under these circumstances, the granting of consent cannot be legally justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is significantly flawed and lacks the necessary evidence to support its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing declines. However, the application fails to provide adequate proof that these species will not be adversely affected by the proposed project. The location of the development falls within critical foraging areas and migratory pathways, yet the assessment does not thoroughly examine the potential risks of displacement, collision, or habitat loss.

There is a notable contradiction within the application itself, as the developer asserts that there are no significant adverse effects while simultaneously putting forth a

Habitats Regulations derogation case, which suggests that significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, indicating that its conclusions lack solid support from the underlying evidence. Furthermore, the assessment does not convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been comprehensively considered, and reliance on modelling approaches introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the inadequacies in baseline data and the incomplete understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor adds a substantial risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term effects 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 standards necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This engages the precautionary principle and renders any conclusion in support of consent unlawful.

Moreover, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects places the proposal at odds with national policy.

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological deficiencies, and insufficient evidence. These shortcomings hinder a thorough evaluation of potential impacts and ultimately support the conclusion that the application does not meet the statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided fails to adequately evaluate community identity and cultural heritage, notably overlooking the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are fundamentally interwoven. By adopting a reductive perspective that treats heritage as a collection of isolated and static assets, the application neglects to recognise their ongoing social, cultural, and spiritual relevance within the community.

There exists a significant deficiency in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites are not merely static features; they are active places of burial and spiritual practice. The current

assessment mischaracterises these locations, failing to account for their continued use and meaning, as well as the potential impacts of development on their surroundings. Such misrepresentation results in an incomplete evaluation of the cultural effects and disregards their importance in community life.

Additionally, there is a troubling absence of consideration for intangible cultural heritage, which includes vital elements such as the Gaelic language, local traditions, and the deep-rooted relationship between the community and the coastal environment. These aspects are central to the area's identity but have been entirely omitted from the assessment, leading to a significant gap in understanding the cultural impact of the proposed development.

Concerns regarding community rights and engagement further exacerbate the situation. The Gaelic-speaking population, which embodies characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to established principles for participation in decisions affecting cultural and environmental matters.

Moreover, there is a critical procedural failure in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The lack of this assessment inhibits the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct conflict with the National Planning Framework 4, particularly with respect to the protection of historic assets and places. The failure to adequately consider both tangible and intangible heritage, along with the disregard for living cultural practices, signifies a clear deviation from policy requirements.

Collectively, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations culminates in a substantial evidential gap. The cultural impacts of the development have not been thoroughly assessed, and the application does not present a robust foundation for evaluating the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The community's wellbeing is at stake due to the significant deficiencies in the assessment of social impacts, health, and wellbeing associated with this proposal. Despite the developer commissioning a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This lack of transparency creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified through the developer's research.

Residents are already facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts have been confirmed through direct engagement and are not merely speculative. However, without access to the complete assessment, the ability to scrutinise these findings is severely limited, ultimately affecting their significance in the decision-making process.

Moreover, the proposal has been perceived 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 adequately incorporated into the main application nor given the attention they deserve. By withholding the full Social Impact Assessment, the true social and human costs of the development remain obscured.

This lack of transparency further undermines the Environmental Impact Assessment process. Understanding the comprehensive social, economic, and health impacts is crucial for developments of this magnitude, especially when they threaten community character and functioning. The omission of the full dataset renders the application insufficient for assessing the balance between benefits and potential harm.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid harm, yet the evidence currently suggests existing adverse effects that have not been fully disclosed. Consequently, without the complete assessment, compliance with relevant policy cannot be verified.

The procedural implications of this situation are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a critical omission in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, paired with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This inadequacy prevents 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 near the West Lewis coastline presents significant deficiencies in its assessment of seascape, landscape, and visual impacts. The open Atlantic horizon, undeveloped character, and strong remoteness of this area are fundamental aspects that would be irreversibly altered by the introduction of an industrial presence. The application fails to accurately reflect the magnitude of the visual change that would arise, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby eroding the naturalness and remoteness that currently define this landscape.

Concerns also arise from the methodology employed in selecting and presenting visual

viewpoints. There is evidence that these viewpoints may not adequately capture the perspectives of the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the assessment underestimates the magnitude of visual impact, compromising its overall reliability.

Moreover, the interconnectedness between landscape, seascape, and cultural heritage has not been properly assessed. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that connects visually and spatially to the Atlantic horizon. The assessment treats these sites in isolation, failing to acknowledge their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any assertion of compliance with relevant policies.

Ultimately, the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Thus, the changes to the landscape are fundamental and permanent, rather than something that can be lessened to an acceptable level through mitigation.

In summary, the assessment fails to convey the true scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. These shortcomings preclude a reliable evaluation and firmly establish that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient. The proposal entails significant seabed preparation and installation work 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 only be prepared after consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures raises concerns, particularly given the sensitive nature of the receiving environment. The West Lewis coastline is home to

clean coastal waters and important habitats, which are at risk of sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether adequate 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, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigations must be evaluated prior to consent; without this information, a lawful determination cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of fisheries and marine life, which results in an incomplete evaluation of both ecological and socio-economic impacts. The West Lewis coast is home to a diverse marine ecosystem and an active fishing industry, yet the proposal does not adequately demonstrate the ability to protect or maintain these vital uses and habitats without causing significant disruption.

A critical concern is the assumption made regarding the displacement of fishing activity, suggesting that such actions can occur without adverse effects. There is a notable absence of evidence indicating the availability, accessibility, or capacity of alternative fishing grounds to accommodate any additional pressures. This gap is especially troubling, as the risk of overfishing in other areas could have broader economic repercussions for the local fishing fleet. The lack of a clear and evidence-based assessment impedes the understanding of potential impacts on fisheries and the livelihoods they support.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. The high-energy hammer piling anticipated over an extended timeframe is expected to disturb marine life across significant distances, specifically affecting species such as dolphins. The predicted disturbances to a considerable portion of the local bottlenose dolphin population are concerning, yet the application tends to minimise these effects without adequate supporting evidence.

The application reveals inconsistencies, notably acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously categorising these impacts as negligible. This contradiction weakens the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm would legally require authorisation.

Additionally, the assessment does not account for cumulative impacts that stem from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential for determining the overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the deficiencies in the evidence surrounding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant concerns regarding the assessment of onshore infrastructure, which is incomplete and does not take into account the full range of impacts from what is a single integrated project. The offshore turbines and onshore works are inherently connected but have been evaluated separately, leading to a fragmented approach that masks the true scale of environmental and socio-economic consequences.

Included in the onshore elements are cabling that crosses protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities require excavation in areas of deep peat, notably within Barvas Moor, which serves as a crucial carbon store and an ecologically sensitive habitat. However, the application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental

footprint.

By omitting or delaying the assessment of onshore impacts, the application obstructs an accurate evaluation of cumulative effects. According to the Environmental Impact Assessment process, all project components should be considered collectively. The division of offshore and onshore elements means that the combined effects on peatlands, habitats, and communities are not fully grasped.

Sensitive habitats, such as machair systems and peatland environments, face significant risks that are subject to policy protection. The application fails to prove that the impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been implemented, highlighting an evident gap in relation to biodiversity protection.

Concerns about carbon balance also arise from the proposal. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land introduces possible conflicts with current land use and legal rights. There is no evidence provided that the required consents or processes have been initiated, which raises issues regarding the project's deliverability and lawful implementation.

From a policy viewpoint, the failure to assess the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to 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 concerning environmental and land use impacts render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism value. The proposed project 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. This change would fundamentally alter the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the region's identity and the emerging tourism sector of astro-tourism, this omission is especially troubling.

Moreover, there is no evaluation of how this lighting would affect nocturnal wildlife.

Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to examine how aviation lighting might impact these species or contribute to mortality rates.

Additionally, the ornithological assessment relies on daytime survey data, which does not capture nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation caused by artificial lighting, yet this risk remains unassessed. Without site-specific night-time data, there is a critical gap in understanding the ecological impacts.

The failure to consider nocturnal impacts raises significant concerns about whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and thereby obstructing a lawful determination.

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

In summary, the lack of assessment concerning dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot support a lawful determination.

TOURISM

The tourism sector on the Isle of Lewis has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application under review lacks a crucial assessment of the tourism impacts, failing to evaluate the economic and social ramifications for this vital sector. Tourism is intrinsically linked to the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure may alter visitor numbers, behaviours, or their overall economic contribution.

The assessment neglects the importance of environmental quality in sustaining tourism, particularly regarding the appeal of unspoiled landscapes and dark skies to enhance visitor experience. The lack of a Dark Skies Assessment exacerbates this deficiency, creating a significant gap in understanding the potential impacts on nature-based tourism and astro-tourism, which are emerging markets. Furthermore, the failure to model how the industrialisation of the seascape and loss of environmental quality

could impact Tourism Gross Value Added or the overall economic resilience signifies a serious oversight. Without this analysis, it is impossible to ascertain if the development would yield a net economic benefit or, conversely, undermine an established and growing sector.

In the context of an island community characterised by limited economic diversification, this oversight carries broader implications for local employment, businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018. From a policy standpoint, the application fails to illustrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector and does not furnish adequate evidence for the competent authority to assess the economic implications of the proposal.

Collectively, the lack of quantification of tourism impacts, the disregard for environmental factors influencing visitor behaviour, and the neglect of the island's economic dependencies culminate in a significant evidential gap. This prevents 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 starkly illustrates a significant failure to meet the principles of sustainable development, particularly when measured against statutory obligations, national policy, and evidential standards. Similar to the 2008 refusal of the Lewis Wind Power proposal, this application again highlights an unacceptable scale of industrialisation, yet it is now being put forward under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

The evidential basis for the proposal is incomplete and unreliable, with critical gaps evident in baseline data. The ongoing use of an unspecified design envelope, alongside unverified mitigation measures, further complicates matters. Notably absent are assessments of key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment lacks the thoroughness needed to fully understand potential significant effects or any residual impacts.

Moreover, there are notable procedural shortcomings within the application. The lack of a compliant Island Communities Impact Assessment constitutes a violation of the statutory duty under the Islands (Scotland) Act 2018. Additionally, the incomplete disclosure of the Social Impact Assessment represents a material omission that hinders a proper evaluation of the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inadequate for determination.

This proposal is also fundamentally at odds with National Planning Framework 4. It fails to provide adequate protections for biodiversity, natural landscapes, and cultural heritage, and does not demonstrate that health and wellbeing impacts are acceptable. Furthermore, it cannot substantiate a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed appropriately, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain unclear and potentially significant, as assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

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

In conclusion, the application as it stands is both procedurally and substantively unfit for determination. The scale of the deficiencies in information, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, it is imperative that the competent authority refuses consent on these grounds or invokes the appropriate regulatory provisions to compel the submission of the necessary information. A formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 7CFD030A

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documents, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale of the proposal, alongside the positioning and design of the turbines, presents serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis required for lawful approval. Key environmental data is absent, baseline information is insufficient and inconsistent, and numerous aspects of the proposal remain undefined. The flexible design framework complicates the ability to ascertain likely significant effects, and the reliance on unspecified mitigation measures means that their potential effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects are not substantiated by robust evidence.

The proposal exhibits clear and substantial conflicts with policy. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not establish that the national requirements for the protection of biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly relate to the statutory tests necessary for consent, diminishing the competent authority's capacity to determine that the development meets policy acceptability.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the environmental effects of the proposed development. The flexible Project Design Envelope employed, lacking concrete turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity undermines the integrity of the assessment and obscures the true environmental impacts, preventing both the public and the competent authority from fully understanding the proposal's consequences.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent under the premise that environmental harm will be addressed at a later stage hinders any meaningful evaluation of their effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unsound and contradicts the aims of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies are clearly established prior to any determination.

The report also suffers from considerable evidential shortcomings, including gaps in baseline data and methodological limitations, leading to a reliance on assumptions rather than site-specific evidence. Consequently, there is uncertainty surrounding the scale and significance of impacts, particularly where negligible or non-significant effects are concluded without robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not fulfil the evidential threshold mandated by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This raises concerns under the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it cannot substantiate that impacts have been thoroughly assessed or that appropriate safeguards exist.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies inhibit a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot adequately evaluate the application based on the provided information.

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 application presents a severely inadequate assessment of marine ecology and protected species within the West Lewis coastal environment, which is both highly sensitive and biologically active. The baseline data provided is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, there is a lack of a reliable evidential basis to evaluate potential impacts.

One significant oversight is the treatment of otters, classified as a European Protected Species. The application does not appropriately recognise their use of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, it fails to properly assess the potential impacts from construction disturbances, noise, and increased activity. This oversight undermines the conclusions drawn regarding the lack of significant effects on this species.

Additional concerns arise with the assessment of basking sharks. The reliance on aerial

surveys introduces a considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show frequent use of these waters. The exclusion or inadequate consideration of such vital data leads to an incomplete baseline, further weakening the reliability of the conclusions made.

These methodological flaws mean that the assertions of negligible or non-significant effects are founded on assumptions rather than solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty about the actual risks to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the criteria outlined in the Environmental Impact Assessment regime or the National Planning Framework 4, as the identification and assessment of protected species have not been conducted properly. The level of uncertainty involved precludes 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 renders the assessment unreliable. These shortcomings inhibit a thorough evaluation of the impacts on marine ecology and protected species, leading to the overarching conclusion that the application is devoid of 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 seriously undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines. However, the application fails to convincingly demonstrate that these species will not be adversely affected. Located within key foraging areas and migratory pathways, the development does not adequately evaluate the implications of potential displacement, collision risks, or habitat loss.

A crucial contradiction arises within the application, wherein the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn lack adequate support from the underlying evidence. Furthermore, the assessment does not sufficiently prove that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is underrepresented, and the reliance on modelling methods introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are

likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The current assessment of the development proposal inadequately addresses the cultural heritage and community identity of the West Lewis coastline. This area is more than just a collection of historical sites; it represents a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application simplifies heritage to mere static features, neglecting their dynamic social, cultural, and spiritual roles within the local population.

Particularly concerning is the treatment of culturally significant locations such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and places of spiritual significance. However, they are mischaracterised as static elements, with the assessment failing to recognise their ongoing use and the implications of development on their surroundings. This oversight leads to an incomplete understanding of the cultural implications, disregarding their vital place in community life.

Moreover, the assessment overlooks intangible cultural heritage, which includes the Gaelic language, local traditions, and the enduring connection between the community and its coastal environment. These aspects are essential to the area's identity but are conspicuously absent from the evaluation, reflecting a critical omission. Ignoring these

factors means that the cultural ramifications of the development remain poorly understood.

The rights and engagement of the community are also at stake. The Gaelic-speaking population has a distinct cultural identity that aligns with the characteristics of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This failure to engage meaningfully raises questions about the validity of the assessment and disregards established principles of participation in decisions that affect cultural and environmental matters.

A further significant issue is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this necessary evaluation, the competent authority cannot legally assess the social, cultural, and economic impacts on the island community. This absence alone renders the assessment deficient and compromises lawful decision-making.

From a policy standpoint, these shortcomings place the proposal in direct contradiction to National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, clearly deviates from policy requirements.

In summary, the collective failures to evaluate living heritage, intangible cultural values, community rights, and adhere to statutory obligations culminate in a substantial evidential gap. The application does not offer a sufficient basis for assessing the genuine cultural costs of the proposed development.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development suffers from a significant lack of transparency concerning its social impacts, health, and wellbeing assessments. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This omission results in a substantial evidential gap, hindering both the public and the competent authority from fully understanding the social risks identified in the developer's research.

Available summaries suggest that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been gathered through direct engagement, therefore are not speculative in nature. However, the failure to disclose the full assessment restricts proper scrutiny of its findings and limits the capacity to gauge their significance in the decision-making process.

Evidence indicates that the proposal is seen as a direct threat to community identity and cohesion, with the developer's own findings highlighting "cultural loss." Despite this, such impacts have not been adequately integrated into the main application nor given appropriate consideration. By withholding the complete Social Impact

Assessment, the true human and social costs of the development remain obscured.

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

From a policy standpoint, the application fails to prove compliance with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm, yet existing evidence points to adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy cannot be demonstrated.

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

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding significant

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

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

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the preservation of natural places and historic assets. The extent of change proposed is inconsistent with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy requirements.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is inadequate, failing to provide essential details needed to evaluate likely environmental effects. The project entails considerable seabed preparation and installation works in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that will be formulated after consent is granted, which hinders any meaningful assessment of their potential adequacy or effectiveness.

This reliance on unspecified future measures raises significant concerns, particularly

considering the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and vital habitats that are at risk of damage from sediment disturbance and contamination. Although the application acknowledges risks such as 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.

Moreover, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences 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.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is received, the application prevents a proper evaluation of whether suitable safeguards are in place to respond to pollution incidents. This creates procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Assessments of likely significant effects and mitigation must be conducted prior to granting consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainties regarding potential impacts collectively render the assessment materially deficient. These issues obstruct a thorough evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The overall assessment of the proposal is fundamentally flawed due to numerous deficiencies that undermine its credibility. A significant concern is the failure to adequately evaluate the socio-economic impacts on the active fishing industry and the diverse marine ecosystem off the West Lewis coast. The application does not provide evidence that alternative fishing grounds can accommodate any displacement resulting from the proposed activities. This raises critical questions regarding the sustainability of local fisheries, as the potential for overfishing in other areas poses wider economic risks for the local fleet.

Furthermore, the assessment underestimates the impact of underwater noise, particularly from high-energy hammer piling, which is anticipated to disrupt marine life

over extensive areas. The concerns surrounding the disturbance to the local bottlenose dolphin population are serious, yet the application downplays these effects, lacking sufficient evidence to justify this stance. There is a troubling contradiction within the application itself; while it acknowledges the necessity of licenses to allow for harm to European Protected Species, it simultaneously claims that the anticipated impacts are negligible. This inconsistency calls into question compliance with the Habitats Regulations and the overall integrity of the assessment process.

Moreover, the assessment does not take into account the cumulative impacts stemming from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined factors, it is impossible to ascertain the full effects on marine ecosystems and the socio-economic conditions that depend on them.

From a policy perspective, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It fails to establish that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity. This lack of evidence regarding fishing displacement, coupled with the underestimation of acoustic impacts and the internal inconsistencies present, ultimately renders the assessment incomplete and unreliable. Thus, a robust evaluation of the impacts on marine life and fisheries remains unachievable.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete 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 linked yet evaluated separately, leading to a fragmented perspective that obscures the actual scale of both environmental and socio-economic consequences.

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

By deferring or excluding the assessment of onshore impacts, the application undermines the ability to evaluate cumulative effects properly. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the disjointed evaluation of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain insufficiently understood.

There are notable risks posed to sensitive habitats, including machair systems and

peatland environments that are under policy protection. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been put in place, leading to a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been pursued, leading to concerns about the project's deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and to show adequate protection for peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the credibility of the application.

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

TOURISM

The Isle of Lewis relies heavily on its tourism sector, which has seen remarkable growth from £65 million in 2017 to over £81.5 million, generating more than 1,000 jobs and representing up to 16% of the island's economy. Despite this vital contribution, the assessment of tourism impacts within the application is significantly lacking, failing to address the economic and social consequences for this essential part of the local economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are crucial to attracting visitors, yet the application acknowledges that 86% of visitors are drawn by scenery without providing any quantified evaluation of how large-scale offshore infrastructure might alter visitor numbers, behaviour, or overall economic input.

The analysis does not model the potential repercussions of industrialising the seascape and deteriorating environmental quality on Tourism Gross Value Added or the island's broader economic resilience. Consequently, it remains unclear whether the proposed development would produce a net economic benefit or jeopardise a sector that is both established and growing. Furthermore, the critical role of environmental quality in supporting tourism has been overlooked, including the significance of unspoiled landscapes and dark skies for visitor experience, alongside emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a notable gap in understanding its impact on a recognised and expanding segment of the local economy.

In an island community with limited economic diversification, the inadequate assessment of 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 sufficiently evaluated, which is a requirement under the Islands (Scotland) Act 2018. From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefit. It also conflicts with strategic objectives that designate tourism as a priority growth sector and lacks the evidence needed for the competent authority to assess the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This deficiency hinders a thorough evaluation of the economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards of sustainable development when evaluated against statutory obligations, national policy, and evidential requirements. The application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, wherein the level of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasizes biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in many areas.

A complete and reliable evidential basis for determination is absent, revealing critical gaps in baseline data. The continued use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of important impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects contribute to an incomplete Environmental Impact Assessment. This deficiency hinders a comprehensive understanding of potential significant effects and residual impacts.

Moreover, there are evident procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the lack of a full 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, making the application unfit for determination.

The proposal directly conflicts with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage, nor does it adequately address health and wellbeing impacts. Furthermore, the absence of tourism impact modelling means that a net economic benefit cannot be evidenced. Inadequate assessment of the cumulative impact of both offshore and onshore elements obscures the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, along with inconsistencies within the data, fail to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This raises concerns that engage the precautionary principle and prevent a lawful determination regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The numerous deficiencies in information, combined with conflicts with policy and unresolved environmental risks, hinder a lawful and evidence-based decision. Therefore, the competent authority is urged to either refuse consent on these grounds or invoke the necessary regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

This development will have horrendous negative impacts on all categories selected above and the returns in terms of power generated to the grid by no means balance these out. Construction such as this should not be introduced to an area specifically known and loved for its marine life, marine visual views and the community impact will also be incredibly negative. The previous attempt to build a wind farm in these islands was refused and so should this. Find an industrial area with less national and international love for its views.

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: 0F313839

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. The application has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. This objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, which reveal significant deficiencies in planning, environmental assessment, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the scale, proximity, and design of the proposal, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful decision-making process. Essential environmental data is absent, the baseline information provided is both limited and inconsistent, and crucial elements of the proposal remain unclear. The flexible design framework used within the application inhibits a comprehensive assessment of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to facilitate a thorough understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust supporting evidence.

There exist substantive conflicts with established policies. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate considerations, and environmental integrity. Such conflicts directly affect the statutory tests required for consent, thereby compromising the competent authority's ability to conclude that the development adheres to policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental ramifications. 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 incapable of sustaining a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies present in the Environmental Impact Assessment Report render it materially inadequate, as it fails to offer a full, transparent, or reliable overview of the proposal's likely environmental effects. The employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces a considerable degree of uncertainty. This uncertainty obstructs the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts described may not correspond to the development that is ultimately realised, which in turn hinders both public understanding and the competent authority's ability to ascertain the true extent of environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The proposed application exhibits significant shortcomings in the assessment of alternatives, failing to meet the statutory obligations of the Environmental Impact Assessment regime. It does not offer a structured and reasoned comparison of realistic alternatives based on their environmental impacts. Instead, it presents a narrative detailing the evolution of the project, which does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging alternatives.

There is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Specifically, the application does not illustrate that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. This is particularly pertinent given the sensitivity of the West Lewis coastline and the critical role that distance from the shore plays in determining impact. The failure to provide such analysis obstructs any conclusion that the proposed location constitutes the least damaging choice.

These inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance, coupled with the absence of comparative analysis, indicates that mitigation by design has not been effectively implemented, resulting in an overreliance on post-design mitigation measures.

Consequently, the application does not satisfactorily demonstrate 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 hinders the competent authority from ascertaining 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 aligns with policy requirements.

From a policy viewpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community well-being. The absence of a structured and comparative assessment is a significant omission that reinforces the overall conclusion that the application has not been adequately evaluated and does not 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 significant seabird populations, many of which are already in decline. The ornithological assessment associated with the development proposal is fundamentally flawed, lacking crucial evidence and containing internal contradictions that undermine its conclusions. It fails to demonstrate that these vital species will not be adversely impacted, particularly as the development sits within key foraging areas and migratory routes. There is inadequate evaluation of the implications regarding displacement, collision risk, and

habitat loss.

Compounding this issue is a glaring inconsistency within the application; the developer asserts that there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted in scenarios where significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment, indicating that its conclusions are unsupported by the available evidence. The assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, and it fails to properly account for the significance of these feeding grounds. The reliance on modelling techniques injects further uncertainty, especially concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses are not fully understood.

Moreover, the proposed siting of turbines within a recognised migratory corridor creates an additional and substantial risk, acting as a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term ramifications of sustained mortality within this corridor, nor does it consider 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 effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and modelling inadequacies, means the standard of beyond reasonable scientific doubt has not been met. This situation necessitates the application of the precautionary principle, which precludes a lawful conclusion in favour of consent.

Additionally, the identified deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects places the proposal in direct contradiction to national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These deficiencies obstruct a robust evaluation of potential impacts and lead to the overall conclusion that the application does not fulfill the statutory requirements necessary for a proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is profoundly insufficient, neglecting to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interwoven. The application reduces heritage to mere isolated assets, failing to recognise their dynamic

social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practice, yet they are mischaracterised as static features in the assessment, overlooking their ongoing significance, usage, and the potential impact of development on their surroundings. This inadequate portrayal leads to a flawed evaluation of cultural effects, ignoring their vital role in community life.

Additionally, the assessment does not take into account intangible cultural heritage elements, including the Gaelic language, traditions, and the deep-rooted relationship between the community and its coastal environment. These aspects are crucial to the area's identity yet are entirely excluded from consideration, marking a significant shortfall. Without evaluating these factors, the cultural ramifications of the development remain unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that meets the recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and does not align with established principles of participation in matters affecting cultural and environmental interests.

A major procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory obligation under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings position the proposal in stark contradiction to National Planning Framework 4, especially concerning the safeguarding of historic assets and places. Ignoring both tangible and intangible heritage and failing to recognise living cultural practices signifies a significant deviation from policy requirements.

In summary, the shortcomings in assessing living heritage, intangible cultural values, community rights, and legal obligations create a considerable evidential gap. The cultural impacts of the development remain inadequately evaluated, and the application does not establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding its social impacts, health, and wellbeing, as the evaluation provided is materially deficient and lacks the necessary transparency for a lawful assessment. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents,

the full report remains unpublished. This lack of disclosure creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of the social risks identified in the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by available summaries. These impacts arise from direct engagement with the community and are therefore not speculative. However, without access to the complete assessment, proper scrutiny of these findings is unattainable, limiting the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with references to “cultural loss” emerging from the developer's findings. Unfortunately, these critical impacts have not been adequately considered in the main application, nor have they been given the appropriate weight they deserve. The failure to disclose the entire Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning may be at stake. The absence of the complete dataset means that the application does not present a thorough evidential basis to assess the balance of benefits and harm.

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

The procedural implications of this situation are considerable. The competent authority is unable to carry out a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This inadequacy obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding seascape, landscape, and visual impacts is significantly inadequate and fails to convey the true extent of change anticipated or the

sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines in close proximity to the shore would establish a persistent and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

The application does not sufficiently represent the extent of this visual transformation. The size and nearness of the turbines will dominate views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the defining characteristics of naturalness and remoteness. The assessment inadequately communicates the significance of this impact within the context of such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. This suggests a possibility that the scale of the visual impact has been downplayed, which undermines the assessment's reliability.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are situated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete appraisal 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 link to the natural horizon. This represents not only a visual impact but also a more extensive cultural and spatial detriment that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The magnitude of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case analysis further weakens any assertion of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their visibility would be overwhelming and unavoidable. Consequently, the change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the extent of impact, the environment's sensitivity, and the interconnectedness of landscape and heritage.

These shortcomings preclude a dependable 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 inadequate. It lacks the necessary detail to evaluate potential environmental effects. The project involves significant seabed preparation and installation in a high-energy Atlantic environment, yet no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans have been provided. Instead, the application depends on mitigation and contingency measures to be developed after consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures is alarming due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it does not sufficiently outline how these issues will be prevented, controlled, or monitored.

There is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without effective modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to possible effects on marine species and habitats already recognised as sensitive within the broader assessment.

Moreover, the lack of detailed emergency response procedures heightens these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards exist to address pollution incidents. This introduces procedural risks and compromises the capacity of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, delaying essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and when such information is lacking, a lawful determination cannot occur. The application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts render the assessment fundamentally flawed. These deficiencies hinder a thorough evaluation of construction and pollution risks and indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The application falls short in providing a thorough assessment of fisheries and marine life, leaving significant concerns regarding ecological and socio-economic impacts unaddressed. The waters off the West Lewis coast host a diverse marine ecosystem and an active fishing industry, yet the proposal fails to ensure that these vital uses and habitats can be safeguarded without considerable disruption.

One major concern is the assumption that fishing activities can be relocated without repercussions. The application lacks evidence to support the availability and accessibility of alternative fishing grounds that could withstand additional pressure. This oversight is critical, as displacement poses a risk of overfishing in other areas, which may result in broader economic implications for the local fishing fleet. Without an evidence-based evaluation, understanding the effects on fisheries and livelihoods is impossible.

The proposal also raises significant risks to marine species, particularly due to the underwater noise generated during construction. Prolonged high-energy hammer piling is anticipated to disturb marine life across extensive areas, impacting species such as dolphins. The expected disturbance to a notable proportion of the local bottlenose dolphin population is alarming, yet the application minimises the importance of these effects without adequate supporting evidence.

There is a notable inconsistency within the application; while it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction questions the credibility of the assessment and suggests potential non-compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to evaluate cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A thorough examination of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not comply with National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, leading to the conclusion that it does not represent sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure related to the project is fundamentally lacking and does not adequately address the full range of impacts arising from this

integrated initiative. The connection between the offshore turbines and the onshore works is essential; however, their separate evaluations lead to a fragmented understanding of the environmental and socio-economic consequences.

Onshore elements involve cabling that traverses protected moorland, the construction of a substation near Stornoway, and associated access routes through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which is both a significant carbon store and an ecologically sensitive area. The failure to provide a comprehensive assessment of these impacts limits understanding of the overall environmental footprint of the project.

By omitting or postponing the assessment of onshore impacts, the application undermines the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered in conjunction; however, the division between offshore and onshore elements obscures the combined impacts on peatlands, habitats, and local communities.

Moreover, sensitive habitats, including machair systems and peatland environments, face considerable risks, and these areas are subject to policy protections. The application lacks evidence that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, highlighting a significant gap in the protection of biodiversity.

Concerns also arise regarding the carbon balance, as disturbances to peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance is positive.

Additionally, routing infrastructure through active croft land raises possible conflicts with existing land use and legal rights. There is a lack of evidence that the requisite consents or processes have been initiated, which calls into question the feasibility and lawful execution of the project.

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

In summary, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts result in an incomplete and unreliable application that prevents a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant gap within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, creates an intrusive "wall of light" effect across the western horizon. This alteration to the night-time environment is not addressed in terms of its impact on visual amenity, landscape character, or the experiences of both residents and visitors. Given the relevance of dark skies to local identity and emerging sectors such as astro-tourism, this omission is particularly concerning.

Moreover, the application neglects to evaluate the impacts on nocturnal wildlife, which is crucial given that species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting. Phototaxis can lead to disorientation and increased risk of collision for these species. The absence of any lighting impact assessment or phototaxis study means there is no consideration of how aviation lighting could affect these species and potentially increase mortality rates.

This critical oversight is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activities and related risks. Species like Kittiwakes, which might forage or migrate at night, are equally at risk of disorientation from artificial lighting; however, this risk remains unassessed. Without site-specific night-time data, a fundamental understanding of ecological impacts is lacking.

Consequently, without a thorough assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and thereby hindering a lawful determination.

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

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 incapable of supporting a lawful determination.

TOURISM

The application presents a serious shortcoming in its evaluation of tourism impacts, crucial for understanding the economic and social implications for the Isle of Lewis. Tourism in this area is heavily reliant on its wild coastline, nearly untouched landscapes, dark skies, and a distinct sense of remoteness. Although it is noted that

86% of visitors are attracted by the scenery, the assessment does not quantify how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this key sector.

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

Furthermore, the assessment neglects to consider how environmental quality underpins tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience, as well as emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this issue, leading to a substantial gap in understanding the effects on a vital and expanding segment of the local economy.

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

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

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

SUMMARY

The 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.

Additional Comments

I was brought up with renewable energy all my life and understood the basic principle of energy requirements. The first is that it should be instant, the second controllable and third, reliable. These are everything which wind is not. Unreliable, uncontrollable and fickle. The threat to the Isle of Lewis by Northland to destroy an enormous swaith of the costal waters of our island is a nightmare waiting to happen. Environmentally destructive and a temporary solution to a problem which the people living omen the mainland lust after to feed their craving for power. And what do they want the power for. Electric cars, AI and heating. If they actually cared about the environment in which we live they would either build their monothysts closer to where they are required, City Parks and Suburban Gardens rhaterb than foisting their industrialisation on us. This is all before we look at the destruction of sea life and the fishing industry, the destruction of the tourist industry and the destruction of the island way of life. Northland have already threatened to build 7 days a week, even on the Sabbath. They will import up to 1500 workers during construction which will overload the health service, ferries, roads and housing stocks. In reality it will end up being like the Highland Clearances all over again.

This hs to stop. The wrong place, the wrong industry, the wrong answer for the island from a company which seems to believe it can bribe us to accept the destruction of the charm of the Hebrides and as with all bribery, normally follows corruption.

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: 01DF2473

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and related documents, highlighting 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, nearly untouched environment, and rich cultural heritage. Concerns have been raised regarding the proposal's scale, proximity, and design in relation to compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a legal determination. There is missing critical environmental data, while the baseline information provided is both limited and inconsistent, with important elements of the proposal remaining undefined. The application employs a flexible design framework, which obscures the understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures hampers any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering the assertions of negligible or non-significant effects unsubstantiated by solid evidence.

There are evident and significant conflicts with established policies. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural areas, cultural heritage, and health and wellbeing. It does not convincingly demonstrate adherence to national requirements for protecting biodiversity, climate considerations, and environmental integrity. These discrepancies directly affect the statutory tests necessary for obtaining consent and challenge the capacity of the relevant authority to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines planned in close proximity to the shoreline, raises major issues regarding landscape capacity, visual impact, and overall environmental consequences. In summary, the lack of adequate information, the dependence on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, it is essential to apply the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness, transparency, and reliability regarding 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. This uncertainty hinders the consistent application of a worst-case scenario and undermines the integrity of the assessment, leading to impacts presented that may not accurately represent the actual development. Consequently, this prevents both the public and the competent authority from understanding the true extent of the environmental effects.

Moreover, the application significantly depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. As a result, consent is sought with the expectation that any environmental harm will be rectified subsequently. This approach hampers any meaningful evaluation of the effectiveness of proposed measures or assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly identified before determination.

There are also substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This situation results in uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not fulfil the evidential threshold stipulated under the Habitats Regulations, which necessitates the exclusion of 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 compliance with the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to demonstrate that environmental harm has been minimised through appropriate site selection, layout, and routing of infrastructure. This indicates a

significant oversight in following the established mitigation hierarchy. Consequently, the competent authority is left without a clear understanding of whether less harmful and more suitable alternatives could be viable. The assessment of alternatives is fundamentally inadequate and does not fulfil the statutory requirements set by the Environmental Impact Assessment regime. Instead of delivering a structured, reasoned comparison of feasible alternatives based on their environmental impacts, the application merely offers a narrative of project development. This flawed approach does not adequately illustrate that less damaging options have been effectively identified, evaluated, and preferred over more harmful solutions.

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns regarding its impact on marine ecology and protected species, particularly within the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the assessment provided is materially deficient, lacking a complete and reliable understanding of ecological receptors. The methodologies used in the assessment do not effectively capture the presence, behaviour, and habitat use of vital species. Consequently, the evidential basis for evaluating potential impacts is inadequate.

A significant oversight is the failure to properly assess the presence of otters, which are a European Protected Species. The application does not adequately acknowledge their active use of coastal areas for foraging and movement. This neglect extends to their core foraging range and behavioural patterns, leaving potential effects from construction disturbances, noise, and increased activity unassessed. This gap

undermines the conclusions drawn about the absence of significant effects on otters.

Further complications arise in the assessment of basking sharks, where reliance on aerial surveys introduces a notable detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when juxtaposed with established land-based observations that indicate frequent use of the waters. The failure to properly consider such crucial data contributes to an incomplete baseline, further weakening the reliability of the assessment's conclusions.

These methodological shortcomings mean that assertions of negligible or non-significant effects rest on assumptions rather than robust evidence. The lack of adequate baseline data inhibits a thorough evaluation of cumulative and indirect impacts, which includes seasonal variations and wider ecosystem interactions. This creates considerable uncertainty regarding the true 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 it has not adequately identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Given these circumstances, granting consent cannot be justified.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These issues hinder a robust evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment reveals significant flaws, with notable evidence gaps and inconsistencies that undermine its findings. The application fails to establish to the necessary evidential standard that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not face adverse impacts. Key foraging areas and migratory pathways are situated where the development is proposed, yet the assessment does not adequately address the potential consequences of displacement, collision risks, or habitat loss.

There is a fundamental contradiction within the application; the developer asserts that there are no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises concerns about the assessment's reliability and suggests that its conclusions are not well-supported by the available evidence. Furthermore, the assessment does not sufficiently demonstrate that seabird populations associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not thoroughly considered, and the reliance on modelling introduces uncertainty, particularly for species like Kittiwakes

and Fulmars, which are in serious decline. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

The location of turbines within a recognised migratory corridor presents an additional 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 impacts of sustained mortality in this corridor or the potential effects on species with small global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and hinders a lawful conclusion in support of consent.

Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The failure to prove that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable, due to internal inconsistencies, methodological shortcomings, and inadequate evidence. Such failings hinder a robust impact evaluation and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to address the cultural heritage and community identity of the West Lewis coastline, which is a dynamic cultural landscape interwoven with environment, language, tradition, and community. It adopts a narrow perspective, viewing heritage merely as disconnected, unchanging assets rather than recognising their vital ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are not accurately represented in the assessment. These locations are active burial sites and centres of spiritual practice; however, they are wrongly categorised as static features. This mischaracterisation ignores their continued significance, the impact of development on their settings, and leads to an inadequate evaluation of the cultural implications.

Moreover, the assessment neglects intangible aspects of cultural heritage, including the Gaelic language, traditional practices, and the deep-rooted relationship between the community and its coastal environment. These elements are crucial to the area's identity, yet they are entirely omitted from the assessment, which represents a serious oversight. Without these considerations, the true cultural impact of the development remains unexamined.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking

community, recognised as Indigenous People, has not been afforded Free, Prior and Informed Consent in this process. The lack of meaningful engagement calls into question the validity of the assessment and disregards essential principles of participation in matters affecting cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thereby hindering a lawful determination.

From a policy standpoint, these deficiencies directly contradict National Planning Framework 4, especially regarding the preservation of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to recognise living cultural practices, illustrates a significant departure from established policy requirements.

In summary, the inadequate assessment of living heritage, intangible cultural values, community rights, and compliance with statutory obligations leads to a substantial evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, thus failing to provide a clear understanding of its true cultural costs.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is critical and has severe implications for the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report remains unpublished. This failure to disclose vital information creates a significant evidential gap, preventing both the public and the competent authority from understanding the complete range of social risks highlighted by the developer's own research.

Available summaries show that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct engagement and are not based on speculation. However, the lack of access to the full assessment hinders proper scrutiny of these findings, limiting the capacity to assess their importance in the decision-making process.

Moreover, evidence indicates that the proposal is viewed as a direct threat to community identity and cohesion, with findings pointing to a potential "cultural loss." Yet, these impacts have not been adequately incorporated into the primary 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 absence of transparency severely undermines the Environmental Impact

Assessment process. It is crucial to have a complete understanding of the social, economic, and health implications for developments of this magnitude, especially when community character and function may be at stake. Without the full dataset, the application does not provide a comprehensive evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application is unable to demonstrate its compliance with National Planning Framework 4 concerning health and wellbeing. Developments must contribute to positive health outcomes and mitigate harm, yet the evidence currently available suggests existing adverse effects that remain undisclosed. In light of the absence of the complete assessment, compliance with this policy is unprovable.

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

In summary, the combination of the non-disclosure of the full Social Impact Assessment and evidence of current adverse impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks adequate supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not sufficiently address the sensitivity of the environment or the scale of change. 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, situated close to the shoreline, would result in a continuous and prominent industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape.

The application does not fully capture the extent of this visual alteration. Due to the scale and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately communicate the significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise from the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the actual visual impact has been underestimated, which undermines the credibility of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context, linked visually and spatially to the Atlantic horizon. Rather than acknowledging their interdependence, the assessment treats these as isolated features, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the preservation of natural spaces and historic assets. The level of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a robust worst-case assessment further undermines claims of policy compliance.

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

Overall, 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 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 application falls short in providing a thorough assessment of fisheries and marine life, leaving significant concerns regarding ecological and socio-economic impacts unaddressed. The waters off the West Lewis coast host a diverse marine ecosystem and an active fishing industry, yet the proposal fails to ensure that these vital uses and habitats can be safeguarded without considerable disruption.

One major concern is the assumption that fishing activities can be relocated without repercussions. The application lacks evidence to support the availability and accessibility of alternative fishing grounds that could withstand additional pressure. This oversight is critical, as displacement poses a risk of overfishing in other areas, which may result in broader economic implications for the local fishing fleet. Without an evidence-based evaluation, understanding the effects on fisheries and livelihoods is impossible.

The proposal also raises significant risks to marine species, particularly due to the underwater noise generated during construction. Prolonged high-energy hammer piling is anticipated to disturb marine life across extensive areas, impacting species such as dolphins. The expected disturbance to a notable proportion of the local bottlenose dolphin population is alarming, yet the application minimises the importance of these

effects without adequate supporting evidence.

There is a notable inconsistency within the application; while it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction questions the credibility of the assessment and suggests potential non-compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to evaluate cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A thorough examination of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not comply with National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, leading to the conclusion that it does not represent sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure associated with this project is significantly incomplete. It fails to take into account the interconnected nature of the offshore turbines and the onshore works. This separate assessment leads to a fragmented understanding of the true environmental and socio-economic impacts of the entire project.

Onshore elements involve the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, is particularly concerning as it is a crucial carbon store and an ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By not assessing the onshore impacts adequately, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process requires a comprehensive consideration of all project components, but the separation of offshore and onshore works prevents a full understanding of their combined effects on peatlands, habitats, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland

environments, which are protected under policy. The application does not show that these impacts have been fully evaluated or that appropriate measures to avoid them have been put in place, highlighting a significant gap in biodiversity protection.

Additionally, the disturbance of peatland poses a risk to carbon balance as it releases stored carbon, which could create a carbon debt and contradict the aims of renewable energy development. The application falls short in addressing this critical issue and fails to demonstrate that the overall carbon balance will remain positive.

The routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence presented that necessary consents or processes have been initiated, leading to concerns about the deliverability and legality of the proposed works.

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

Overall, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts contribute to an incomplete and unreliable application, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fundamentally alters the night-time environment along the West Lewis coastline, introducing permanent red aviation lighting that creates a continuous and intrusive “wall of light” effect across the western horizon. This significant change not only impacts visual amenity but also poses a severe risk to the area’s cultural identity and tourism value, particularly in light of the emerging astro-tourism sector, which thrives on the exceptionally dark skies that characterise this region. The application fails to assess how this new lighting affects landscape character or the experience of both residents and visitors, leaving a critical gap in the environmental assessment.

Moreover, the absence of an evaluation concerning the impacts on nocturnal wildlife is alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be particularly sensitive to artificial lighting due to phototaxis. The proposal neglects to include any form of lighting impact assessment or phototaxis study, thus failing to evaluate how the aviation lighting might increase the risk of disorientation and collision for these species. This omission is further exacerbated by a reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from such lighting, yet this risk has not been addressed.

The lack of site-specific night-time data creates an essential void in understanding the ecological impacts, preventing a determination of whether protected species or designated sites could be adversely affected. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt remains unmet, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this glaring omission contradicts the National Planning Framework 4, which underscores the importance of protecting natural places and ensuring environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall ecosystem.

In sum, 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 means that the application is incomplete and cannot support a lawful determination.

TOURISM

The assessment of the tourism impacts is inadequate and does not evaluate the economic and social consequences for an important sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. While the application states that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application fails to model the impact of industrialisation on the seascape and the loss of environmental quality on Tourism Gross Value Added or overall economic resilience. This lack of analysis means it is impossible to determine whether the development would provide a net economic benefit or harm a vital and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in promoting tourism, including the value of unspoiled landscapes and dark skies for visitor experience and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, leaving a major gap in understanding the impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the neglect of tourism impact assessments poses broader implications for employment, local businesses, and community sustainability. The failure to conduct a proper Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with 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 lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the inability to quantify tourism impacts, assess environmental factors that drive visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined in statutory duties, national policy, and evidential standards. It mirrors the central issues that led to the 2008 rejection of the Lewis Wind Power proposal, which found the level of industrialisation unacceptable. This new application is presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

There are significant gaps in the evidential basis necessary for proper determination of the application. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the absence of crucial impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism, have resulted in an incomplete Environmental Impact Assessment. This inadequacy hinders a comprehensive understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. The failure to provide a complete Social Impact Assessment represents a serious omission that prevents the competent authority from evaluating the effects on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unfit for determination.

The proposal is at odds with the National Planning Framework 4, failing to prove the protection of biodiversity, natural spaces, 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 modelling. The cumulative effects of offshore and onshore components have not been adequately assessed, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals remain incomplete and inconsistent in places. The evidence presented does not meet the threshold required to eliminate adverse effects beyond reasonable

scientific doubt, thus engaging the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal would lead to substantial and irreversible changes in 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 are permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

It's absolutely outrageous to have these turbines allocated around the west of Lewis. This Island is unique and we take great pride in our Island.

I have a self catering Pod and my guests come here to the island to escape these horrendous looking structures and take in the pure beauty of what they see around them.

This will directly impact my business if these get the go ahead.

What benefit is it going to be to us absolutely nothing it's pure greed from the fat cats with power pointing fingers.

It will ruin our westside of Lewis.

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: 7CEF5830

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. Upon reviewing the Environmental Impact Assessment Report and associated documentation, it is clear that there are significant deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The project is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the development raise fundamental questions about its alignment with statutory requirements, national policy, and sustainable development principles.

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

Additionally, clear and substantive conflicts with policy exist. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly impact the statutory tests required for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is fundamentally insufficient, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interwoven. The application

reduces heritage to isolated, static assets, disregarding their ongoing social, cultural, and spiritual significance within the community.

Culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas, are misrepresented in the assessment. These locations serve as active sites of burial and spiritual practice, yet they are classified as static features. This mischaracterisation neglects their current use and meaning, as well as the impact of development on their setting, leading to an incomplete evaluation of cultural effects and dismissing their importance within community life.

Moreover, the assessment fails to consider intangible cultural heritage, such as the Gaelic language, traditions, and the established relationship between the community and the coastal environment. These aspects are integral to the area's identity but have been entirely omitted from the assessment, creating a significant gap. Without addressing these factors, the true cultural impact of the development remains poorly understood.

Concerns extend to community rights and engagement. The Gaelic-speaking population holds a unique cultural identity with characteristics of an Indigenous People; however, no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement questions the legitimacy of the assessment and neglects established principles regarding participation in decisions that affect cultural and environmental interests.

A serious procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately fulfil its legal obligation to evaluate the social, cultural, and economic ramifications for the island community. This omission alone renders any lawful determination impossible.

From a policy standpoint, these shortcomings clash directly with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, indicates a clear deviation from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations leads to a substantial evidential gap. The cultural consequences of the development have not been adequately examined, and the application does not establish a sufficient foundation for evaluating the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full Social Impact Assessment has not been published, leading to a significant evidential gap that hampers both public understanding and the competent authority's ability to evaluate the associated social risks comprehensively. Although the developer has undertaken a Social Impact Assessment that included focus groups with local

residents, the non-disclosure of the complete report raises concerns regarding transparency and thoroughness in the evaluation process. Summaries reveal that residents are facing measurable stress, anxiety, and concern due to the proximity and scale of the proposed development, underscoring the need for a detailed examination of these impacts, which are based on direct engagement rather than speculation.

Moreover, the proposal is viewed as a threat to community identity and cohesion, with the developer acknowledging potential “cultural loss” in their findings. However, these significant impacts have not been adequately incorporated into the main application or weighted appropriately. The withholding of the full assessment obscures the true social and human costs associated with the development, thereby undermining the overall Environmental Impact Assessment process.

A comprehensive understanding of social, economic, and health impacts is imperative for developments of this magnitude, particularly when community character is at stake. The failure to disclose the complete dataset inhibits a balanced assessment of benefits and harm, rendering the application deficient. From a policy standpoint, the application does not align with National Planning Framework 4 regarding health and wellbeing, which necessitates that development fosters positive health outcomes and mitigates harm. Existing evidence indicates adverse effects that have not been fully disclosed, further complicating compliance with this policy.

The procedural ramifications of this situation are substantial. Without the complete Social Impact Assessment, the competent authority cannot conduct a thorough socio-economic and health evaluation, constituting a material omission within the application. This failure to meet the evidential requirements of the Environmental Impact Assessment framework is critical. Collectively, the non-disclosure of the full assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable evaluation, obstructing a lawful determination and reinforcing the assertion that the application lacks sufficient supporting information.

CONSTRUCTION AND POLLUTION RISKS

The assessment of risks related to construction and pollution is lacking and does not include the necessary detail to evaluate potential environmental effects. The project involves significant seabed preparation and installation activities in a high-energy Atlantic setting, but there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would be prepared after consent, which hampers any meaningful assessment of their sufficiency or effectiveness.

This dependence on unspecified future measures raises particular concerns, especially considering the sensitivity of the environment. The West Lewis coastline features clean coastal waters and crucial habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it lacks adequate information on how these issues will be prevented, controlled, or monitored.

There is also ambiguity about the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of thorough modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to potential effects on marine species and habitats already recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the capability of the competent authority to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the demands of the Environmental Impact Assessment regime. It is necessary to evaluate likely significant effects and mitigation before consent, and without this information, a lawful determination cannot be achieved. Moreover, the application fails to show 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 regarding potential impacts lead to a materially deficient assessment. These deficiencies hinder a comprehensive evaluation of construction and pollution risks, reinforcing the view that the application is incomplete.

TOURISM

The assessment regarding the impacts on tourism is significantly lacking and does not adequately evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly unspoiled landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantifiable assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not model the effects that the industrialisation of the seascape and the degradation of environmental quality would have on Tourism Gross Value Added or broader economic resilience. In the absence of such an analysis, it remains unclear whether the development would generate a net economic benefit or detract from an already established and expanding sector.

Moreover, the assessment neglects to account for the critical role that environmental quality plays in tourism, including the significance of unspoiled landscapes and dark

skies in shaping visitor experiences and fostering emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a substantial gap in the understanding of the impacts on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental influences on visitor behaviour, and acknowledging the island's economic dependency lead to a significant evidential gap. This hinders a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was noted. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a complete and reliable evidential basis for proper determination.

There are significant gaps in the baseline data provided, reliance on an undefined design envelope, unspecified mitigation measures, and crucial omissions regarding impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

Procedurally, there are notable failures as well. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, while the incomplete disclosure of the Social Impact Assessment is a substantial omission. These issues prevent the competent authority from adequately evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal stands in direct opposition to National Planning Framework 4. It does not demonstrate the necessary protections for biodiversity, natural environments, and cultural heritage, fails to validate acceptable health and wellbeing impacts, and lacks evidence for a net economic benefit due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has been inadequately conducted, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are considerable and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and at times inconsistent. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

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

Additional Comments

Island life will be severely disrupted.

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: 62AB06E1

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and its supporting materials reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's scale, proximity to the shoreline, and design, all of which question its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. There is a critical absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Several key aspects of the proposal are undefined, and the flexible design framework used hinders a comprehensive understanding of the potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation fails to provide a complete and informed overview of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack solid evidence.

The proposal faces clear and substantial policy conflicts. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and hinder the competent authority's capacity to deem the development acceptable from a policy standpoint.

Given the unprecedented scale of the proposal in this location, with large turbines situated close to the shoreline, there are significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary robustness and fails to deliver a full, transparent, or reliable analysis of the potential environmental effects of the proposed development. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This approach introduces substantial uncertainty and inhibits a consistent application of a worst-case scenario, ultimately undermining the integrity of the assessment. As a result, the impacts reported may not accurately reflect the actual development, hindering both public understanding and the competent authority's ability to gauge the true extent of environmental consequences.

Consent for the application is sought based on mitigation measures, monitoring strategies, and management plans that are not yet defined. This reliance on unspecified strategies means that any environmental harm is to be addressed at a later stage, thus preventing a meaningful evaluation of their effectiveness or a proper assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and directly contradicts the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to any determination.

Moreover, there are significant evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle is engaged, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, failing to ensure that impacts have been comprehensively assessed or that appropriate safeguards are implemented.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a biologically active marine system that requires thorough ecological assessment. However, the assessment of marine ecology and protected species presented in the application is significantly lacking. It fails to provide a reliable understanding of ecological receptors in this sensitive area due to

incomplete baseline data and methodologies that do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, this deficiency compromises the evaluation of potential impacts on the ecosystem.

Specifically, otters, classified as a European Protected Species, have not been properly recognised within the assessment. The application overlooks their active use of coastal regions for foraging and movement, leading to an inadequate analysis of how construction disturbance, noise, and increased activity could affect these animals. This failure to assess their core foraging range and behavioural patterns casts doubt on the conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks suffers from methodological flaws. It relies heavily on aerial surveys, which introduce a notable detection bias, particularly under Atlantic conditions. This reliance risks underestimating the presence of basking sharks, especially when compared to established land-based observations that demonstrate frequent use of these waters. Neglecting to incorporate or adequately consider such data results in an incomplete baseline, which further undermines the reliability of the conclusions drawn.

Due to these methodological limitations, the assessment's findings of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of comprehensive baseline data hinders any meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. This raises uncertainties about the actual risks facing marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to identify or assess protected species appropriately. This uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Given these circumstances, it follows that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These deficiencies obstruct a comprehensive evaluation of impacts on marine ecology and protected species and highlight the overarching issue that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment's deficiencies are significant and demonstrate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The proposal is in direct conflict with national policy, as it cannot adequately show that internationally important seabird populations will remain unaffected.

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

The assessment lacks sufficient evidence concerning the seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully taken into account, and the reliance on modelling introduces uncertainty, particularly for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies applied are likely to underestimate mortality, especially given that baseline data is incomplete and behavioural responses are not fully understood.

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

There exists a fundamental contradiction within the application; the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically necessitated only when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence presented.

Overall, the assessment is fundamentally flawed, characterised by internal inconsistency, methodological weaknesses, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity within the application is fundamentally inadequate. It adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets rather than recognising their ongoing social, cultural, and spiritual relevance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice. Despite their continued use and significance, the assessment categorises them as static features, neglecting their ongoing meaning and the potential impact of development on their setting. This mischaracterisation leads to

an incomplete evaluation of cultural effects and dismisses their integral role in community life.

The assessment also fails to account for intangible cultural heritage, including the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are vital to the area's identity yet are conspicuously absent from the evaluation, representing a significant oversight. Ignoring these factors means that the true cultural impact of the development cannot be accurately assessed.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity recognised as that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the legitimacy of the assessment and ignores established principles of participation in decisions that affect cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018, highlights a critical procedural failure. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This oversight alone hinders a lawful determination.

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

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been appropriately evaluated, and the application lacks a sufficient basis for determining 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 seascape, landscape, and visual impacts related to the proposal is fundamentally flawed and fails to reflect the true extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unobstructed Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would create a continuous and dominant industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application does not accurately represent the magnitude of visual change that would occur. The size and proximity of the turbines would dominate views

from residential areas, historic sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not properly communicate the significance of this impact within the context of such a sensitive landscape.

There are also serious methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and landscapes of high value. This leads to the possibility that the visual impact has been underestimated, which undermines the reliability of the assessment.

Moreover, the assessment neglects to examine the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context that is visually and spatially linked to the Atlantic horizon. Treating these as isolated assets fails to recognise their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

The industrialisation of the seascape would sever these relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This represents a visual impact that extends to broader cultural and spatial harm, which has not been adequately addressed 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 extent of change is incompatible with the requirement to preserve landscape character, visual amenity, and the setting of culturally significant sites. The absence of a thorough worst-case assessment further weakens any assertion of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting change is not merely a matter that can be reduced to an acceptable level through mitigation, but rather represents a fundamental and permanent alteration.

In summary, the assessment fails to accurately depict the scale of impact, the environment's sensitivity, and the interconnected nature of 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 proposal entails significant seabed preparation and installation activities within a challenging Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This insufficiency

hinders a thorough assessment of potential environmental effects, relying instead on unspecified mitigation and contingency measures to be developed after consent, which prevents a meaningful evaluation of their sufficiency.

Particularly alarming is the absence of detailed emergency response procedures, which exacerbates concerns about environmental protection. By postponing contingency planning until after consent, the application hinders the ability to assess whether adequate safeguards are in place for pollution incidents, introducing procedural risks that compromise the competent authority's evaluation of environmental measures at the determination stage.

The coastline of West Lewis is known for its clean coastal waters and vital habitats, which are at risk of disturbance and contamination. While the application acknowledges hazards such as sediment mobilisation and accidental spills, it does not present enough information on prevention, control, or monitoring strategies. Furthermore, the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations complicates the assessment. Without robust modelling and clearly articulated management approaches, the ecological effects, duration, and extent of these impacts cannot be accurately determined.

From a regulatory viewpoint, the lack of defined mitigation measures and detailed management strategies raises serious concerns about compliance with the Environmental Impact Assessment regime. The assessment of significant effects and mitigation must occur before consent, and absent this information, a lawful determination becomes unattainable. Collectively, these deficiencies render the assessment materially inadequate, obstructing a thorough review of construction and pollution risks, and further affirm the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application proposes a development that significantly lacks a thorough assessment of fisheries and marine life, failing to adequately evaluate ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the proposal does not sufficiently demonstrate how these vital uses and habitats can be protected or maintained in the face of potential disruptions.

A critical concern is the assumption made within the application that fishing activities can be displaced without repercussions. There is no evidence provided that alternative fishing grounds are available, accessible, or capable of withstanding the increased pressure that displacement would create. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. As a result, without an evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal introduces serious risks to marine species, particularly due to

the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended timeframe is likely to disturb species over large distances, notably impacting the local bottlenose dolphin population. Concerns regarding the predicted disturbance to a significant proportion of these dolphins are serious, yet the application appears to downplay these effects without providing adequate supporting evidence.

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

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity. This lack of clarity prevents any conclusion that the proposal aligns with the principles of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed development lacks completeness, particularly regarding onshore infrastructure, which is crucial to understanding the impacts of this single integrated project. The offshore turbines and the onshore works are closely interconnected, yet they are treated as separate entities in the assessment process. This fragmented approach obscures the true scale of both environmental and socio-economic effects that arise from the project.

Onshore elements include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and an ecologically sensitive habitat. The lack of a comprehensive assessment regarding these impacts means the overall environmental footprint of the project cannot be fully understood.

By deferring or excluding the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered together. The division of offshore and onshore elements results in a lack of understanding of the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The proposal does not sufficiently demonstrate that the impacts on these habitats have been adequately assessed or that effective avoidance measures have been implemented. This indicates a significant gap in evidence concerning biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application falls short in addressing this concern or in proving that the overall carbon balance remains positive.

The routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence to confirm that necessary consents or processes have been initiated, which casts doubt on the project's deliverability and legality.

From a policy perspective, the failure to assess the project as a cohesive entity and to show that peatlands, habitats, and land use interests are protected is in direct conflict with the National Marine Plan and the National Planning Framework 4. Moreover, 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 thorough assessment, and the lack of evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to account for dark skies and nocturnal wildlife, which represents a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, a crucial element that contributes to the area's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting, which would be visible over long distances, creating a pervasive "wall of light" effect across the western horizon. This change would drastically impact the night-time environment.

Moreover, there has been no assessment of how this lighting would affect visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the role dark skies play in shaping the area's identity and

supporting burgeoning sectors like astro-tourism. The lack of consideration for these effects represents a distinct gap in the overall evaluation of landscape and environmental impacts.

Equally alarming is the absence of an evaluation concerning the impacts on nocturnal wildlife. Various species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are notably sensitive to artificial lighting due to phototaxis, which can result in disorientation and a higher risk of collisions. The application lacks a lighting impact assessment or a phototaxis study, meaning there is no analysis of how aviation lighting might influence these species or increase mortality rates.

Additionally, the ornithological assessment is based solely on daytime survey data, failing to address nocturnal activity and its associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been adequately evaluated. The absence of night-time site-specific data creates a significant gap in understanding the ecological consequences.

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

From a policy standpoint, this oversight contradicts National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It further weakens the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is a vital aspect of the overall ecosystem.

In summary, the lack of assessment regarding dark skies and nocturnal wildlife leads to a profound evidential gap. The absence of baseline data, impact modelling, and species-specific analysis ultimately renders the application insufficient and incapable of facilitating a lawful decision.

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its scenery. However, it does not provide any quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism. This is particularly concerning given that tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy.

Furthermore, the assessment overlooks the critical role of environmental quality in sustaining tourism, such as the significance of unspoiled landscapes and dark skies for visitor experiences. Emerging markets like nature-based tourism and astro-tourism rely heavily on these attributes. The failure to include a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the impacts on a recognised

and expanding sector of the local economy.

In an island community where economic diversification is limited, the lack of assessment regarding tourism impacts 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 associated with tourism have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

Overall, the combination of not quantifying tourism impacts, neglecting environmental drivers of visitor behaviour, and disregarding the island's economic dependency leads to a significant evidential gap. This absence of thorough analysis hinders a robust evaluation of economic effects and suggests 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 when evaluated against statutory obligations, national policy, and evidential standards. This application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, wherein the extent of industrialisation was deemed unacceptable. Presenting the proposal under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify these concerns.

There are significant deficiencies in the evidential basis provided for the application. Critical gaps exist in baseline data, the design envelope remains undefined, reliance on unspecified mitigation measures is evident, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and effects on tourism have been omitted. Consequently, the Environmental Impact Assessment is incomplete, which hinders a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are also apparent. The lack of a compliant Island Communities Impact Assessment represents a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment constitutes a material omission. Such deficiencies obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal is in direct opposition to National Planning Framework 4, failing to demonstrate adequate protection of biodiversity, natural environments, and cultural heritage. It does not provide assurance that health and wellbeing impacts are

acceptable and lacks tourism impact modelling to evidence a net economic benefit. Furthermore, the cumulative impact of both offshore and onshore components has not been properly assessed, which obscures potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies in parts. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is unfit for determination both procedurally and substantively. The combination of significant information deficiencies, policy conflicts, and unresolved environmental risks precludes a lawful and evidence-based decision. The competent authority should refuse consent based on these grounds or utilise the relevant regulatory provisions to require the submission of the missing information.

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

Additional Comments

I live in Barvas on the west side of Lewis.

My view will be affected by this ill considered construction. My large living room window which looks out on the beautiful unspoiled Atlantic will be obstructed by these monstrosities.

My sheep grazing park on the Barvas Moor is going to be dug up to create a haul road for heavy machinery.

The Lewis peatlands are going to be destroyed to build this Haul Road and the environmental impact is immeasurable.

The precious machair will be destroyed by construction work leaving scarring on the landscape and disruption of nesting birds. The unique protected Sea Eagles have made the machair their home and are seen regularly out at sea where these turbines will destroy their habitat.

I have a holiday let in Dell and the unique selling point is the beautiful sea view and the stunning view in Dell Valley. At the end of the croft is a secluded area of beach where our guests enjoy swimming and often visit in the evening enjoying the beautiful sunset,

this will be destroyed by these horrendous brightly lit monstrosities planned close to land along our coastline.

The marine life along our beautiful coast line will be greatly affected during construction of the turbines.

Our unique Island life and our own and our children's lives will have a negative impact on our lives as our beautiful island is made into a industrial desert.

After all this destruction we as islanders will have no direct compensation or financial benefit in thr form of cheaper electricity.

Shame on our greedy local authority and Scottish Govermemt for allowing this to go ahead, only to destroy our unique environment and the preservatuon of our culture.by selling of to the highest bidder.

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: F8A4D2D9

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 associated with the proposal is fundamentally inadequate, lacking a comprehensive, transparent, and dependable evaluation of its potential environmental effects. The employment of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, introduces considerable uncertainty. This ambiguity hinders the consistent application of a worst-case scenario analysis, ultimately compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately reflect what will be constructed, obscuring the true extent of environmental consequences from both the public and the competent authority.

Furthermore, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions, where environmental harm is purportedly to be addressed subsequently, obstructs any substantive evaluation of effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent phases contravenes the procedural requirements of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established before any determination is made.

Moreover, there exist notable evidential shortcomings, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such inadequacies lead to uncertainties regarding the magnitude and significance of impacts, particularly where conclusions suggest negligible or non-significant effects without robust supporting data. The lack of comprehensive information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations necessary to dismiss 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 adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be conclusively shown 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 clearly defined mitigation measures, and the notable gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and rigorous evaluation of environmental effects and result in the competent authority lacking the requisite information to appropriately determine the application.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is fundamentally lacking and fails to fulfil the statutory obligations of the Environmental Impact Assessment regime. Rather than delivering a structured and reasoned comparison of viable alternatives with respect to their environmental impacts, the application merely recounts the evolution of the project. This narrative fails to convincingly show that less harmful options have been identified, assessed, and selected over more damaging ones.

There is a notable absence of a transparent and evidence-based comparison of various offshore locations, development scales, or design configurations. The application does not adequately illustrate that the developer has given serious consideration to positioning the turbines further offshore, a move that would likely mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining impact, the lack of such analysis undermines any assertion that the proposed siting is the least damaging option available.

These deficiencies are also evident in the assessment of cable routing and landfall, where insufficient evidence is provided to indicate that alternative routes have been thoroughly explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been effectively implemented, instead leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through careful consideration of site selection, layout, and infrastructure routing. This shortcoming reflects a failure to adhere to the established mitigation hierarchy, which hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. The absence of a rigorous alternatives assessment raises doubts about the sustainability and policy compliance of the proposal.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw that leads to the overarching conclusion that the application has not been sufficiently evaluated and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species exhibits significant deficiencies, failing to deliver a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is biologically active and highly sensitive, yet the baseline data remains incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat utilisation of key species, undermining the evidential basis for evaluating impacts.

One notable oversight pertains to otters, classified as a European Protected Species. The application does not adequately recognise or assess their use of coastal areas for foraging and movement. The absence of an evaluation of their core foraging range and behavioural patterns results in a failure to adequately consider the potential effects of construction disturbance, noise, and increased activity, thereby undermining conclusions regarding the absence of significant effects on this species.

Further weaknesses appear in the assessment of basking sharks, with a reliance on aerial surveys that introduce significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. Neglecting to incorporate or properly assess such data results in an incomplete baseline, consequently weakening the reliability of the presented conclusions.

These methodological shortcomings render the conclusions of negligible or non-significant effects reliant on assumptions rather than robust evidence. The lack of sufficient baseline data obstructs meaningful evaluation of cumulative and indirect impacts, which includes considerations for seasonal variation and broader ecosystem interactions. This uncertainty complicates understanding the true scale of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted lacks reliability due to significant internal inconsistencies and methodological weaknesses, which result in a failure to provide adequate evidence. The application does not meet the evidential threshold required to demonstrate that the integrity of protected sites will remain unaffected. Notably, the assessment fails to robustly evaluate the implications of displacement, collision risk, or habitat loss within key foraging areas and migratory pathways located on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline.

There exists a fundamental contradiction in the application. The developer asserts that

no significant adverse effects will occur while simultaneously proposing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and the validity of its conclusions, which are not substantiated by the evidence presented.

Furthermore, the assessment does not sufficiently account for the importance of feeding grounds associated with protected sites, such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches creates uncertainty, particularly for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain inadequately understood.

The placement of turbines within a recognised migratory corridor introduces a notable risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately addressed in the application, nor are the potential effects on species with relatively small global populations considered.

In light of these deficiencies, the application stands in direct conflict with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects undermines compliance with national policy.

Collectively, these factors contribute to the conclusion that the assessment does not fulfil the statutory requirements necessary to support a determination. The standard of beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and precluding a lawful conclusion in favour of consent.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the West Lewis coastline's cultural heritage and community identity is fundamentally flawed. It fails to recognise this area as a living cultural landscape where the environment, language, tradition, and community are interconnected. The application adopts an overly simplistic viewpoint, treating heritage merely as a collection of isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial grounds and spiritual sites, yet they are mischaracterised in the assessment as static features, disregarding their continued use, significance, and the implications of development on their surroundings. This inadequate portrayal leads to an incomplete understanding of cultural effects and overlooks the vital role these sites play in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic

language, local traditions, and the longstanding relationship between the community and the coastal environment. These elements are essential to the area's identity but are entirely omitted from the evaluation, creating a critical gap in understanding the cultural impact of the proposed development.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of meaningful engagement calls into question the legitimacy of the assessment and contravenes established principles for participation in matters affecting cultural and environmental interests.

A major procedural failure is the absence of a compliant Island Communities Impact Assessment, which is legally mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these significant deficiencies position the proposal in direct conflict with the National Planning Framework 4, especially concerning the protection of historic assets and sites. The neglect to consider both tangible and intangible heritage, as well as 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 culminates in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not offer a sufficient foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's Social Impact Assessment has raised significant concerns, as it lacks the necessary transparency for a lawful evaluation. While the developer engaged with local residents through focus groups, the full report has not been published. This gap in available information hinders both the public and the competent authority from grasping the full extent of the social risks identified in the developer's own research.

Residents are reportedly experiencing tangible stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are not merely speculative. However, the failure to disclose the complete assessment restricts proper scrutiny of the findings, limiting the ability to assess their significance in the decision-making process.

Moreover, there is a prevailing perception that the proposal threatens community identity and cohesion, with "cultural loss" identified within the developer's findings. Nonetheless, these impacts have not been adequately integrated into the main

application or given the necessary attention. The lack of a full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The absence 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 are at stake. Without the complete dataset, the application lacks a robust evidential basis to assess the balance between benefits and harms.

From a policy perspective, there is a failure to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are expected to promote positive health outcomes and avoid harm, yet available evidence suggests adverse effects that remain undisclosed. Without the complete assessment, the application cannot prove compliance with this policy.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material deficiency in the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This compromises the capacity for a lawful determination and reinforces the view that the application is not backed by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is alarmingly inadequate and does not truly capture the extent of change or the sensitivity of the environment that would be affected. The West Lewis coastline is characterised by its expansive Atlantic horizon, its unspoilt nature, and its profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would impose a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

Moreover, the application fails to portray the scale of this visual disruption accurately. The turbines would dominate views from residential areas, historic sites, and popular coastal spots, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment neglects to adequately express the significance of this impact within such a vulnerable landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This oversight risks understating the visual

impact's magnitude and calls into question the reliability of the assessment.

Another serious shortcoming is the failure to consider the interconnected nature of the landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these as separate assets rather than acknowledging their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural relevance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and breaking their connection to the natural horizon. This impact transcends mere visual disruption, representing a significant cultural and spatial harm that the application does not adequately address.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which relates to the protection of natural environments and historic sites. The scale of proposed change is fundamentally at odds with the necessity to preserve landscape character, visual amenity, and the contexts of culturally important locations. Furthermore, the absence of a thorough worst-case assessment raises serious doubts about compliance with policy requirements.

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

In summary, the assessment fails to represent the impact's scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. These significant deficiencies preclude a reliable evaluation and reinforce the assertion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks sufficient detail regarding the assessment of construction and pollution risks, rendering it materially deficient. It involves significant seabed preparation and installation activities within a high-energy Atlantic environment, yet does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be formulated post-consent, which hampers any meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures is particularly troubling in light of the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and significant habitats that are at risk from sediment disturbance and contamination. While the application does recognise risks such as sediment

mobilisation and accidental chemical or oil spills, it fails to furnish adequate detail on the methods of prevention, control, or monitoring of these risks.

Moreover, there exists uncertainty surrounding the scale and behaviour of sediment plumes produced by seabed disturbance and cable installation. Without comprehensive modelling and explicitly defined management strategies, the potential extent, duration, and ecological effects of these impacts cannot be determined. This uncertainty extends to potential consequences for marine species and habitats that have already been acknowledged as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the assessment of whether appropriate safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the capability of the competent authority to review environmental protection measures during the determination process.

From a regulatory viewpoint, the postponement of vital environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to consent, and in the absence of this information, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and the uncertainty regarding potential impacts collectively indicate that the assessment is insufficient. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life presented in this application is inadequate and fails to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem alongside a vital fishing industry, yet the application does not convincingly demonstrate that these uses and habitats can be preserved without causing considerable disruption.

A significant concern arises from the assumption that fishing activities can be relocated without repercussions. There is no supporting evidence that alternative fishing grounds are not only available but also accessible and capable of absorbing additional pressure. This critical gap poses a risk of overfishing in other areas, which could lead to detrimental economic consequences for the local fishing fleet. In the absence of a clear, evidence-based assessment, the effects on fisheries and the livelihoods they support remain unclear.

Moreover, the proposal brings with it considerable risks to marine species, particularly due to the underwater noise associated with construction. The use of high-energy hammer piling over an extended period is likely to create disturbances over large distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises urgent concerns, yet these effects are minimised in the application without sufficient supporting evidence.

There is a troubling inconsistency within the application, where the necessity for licences to allow harm to European Protected Species is acknowledged, while simultaneously downplaying the impacts as negligible. This contradiction undermines the assessment's credibility and raises serious issues regarding compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a significant challenge due to its fragmented assessment of onshore infrastructure, which is insufficient and does not account for the entirety of impacts associated with the integrated project. The offshore turbines and onshore works are interdependent, yet they are evaluated in isolation, leading to an incomplete understanding of the environmental and socio-economic consequences of the project.

Key onshore elements of the proposal encompass cabling that crosses protected moorland, the construction of a substation close to Stornoway, and the creation of access infrastructure that traverses sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, an important carbon store and ecologically significant habitat. The lack of a thorough assessment regarding these impacts results in an inadequate comprehension of the project's overall environmental footprint.

This omission of onshore impact assessments prevents a proper evaluation of

cumulative effects, as the Environmental Impact Assessment process mandates that all project components be considered collectively. The disjointed analysis of offshore and onshore elements obscures the understanding of combined impacts on peatlands, habitats, and local communities.

Additionally, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to establish that impacts on these critical habitats have been thoroughly evaluated or that adequate avoidance measures have been incorporated. This situation leads to a significant evidential gap concerning biodiversity protection.

Concerns also arise around the project's carbon balance. The disruption of peatland can release sequestered carbon, which might create a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or confirm that the overall carbon balance remains advantageous.

Moreover, the planned routing of infrastructure through active croft land brings potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises questions regarding the feasibility and lawful execution of the project.

From a policy standpoint, the failure to evaluate the project as a unified whole 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 conclusion, the separation of project elements, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts culminate in an incomplete and unreliable application, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

There has been no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the local identity and to the developing sector of astro-tourism, this omission is particularly concerning. The lack of consideration for these factors highlights a clear gap in the overall assessment of landscape and environmental impacts.

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

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

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

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

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are drawn by scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution. The tourism sector has seen significant growth, 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 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 analysis, it is unclear whether the development would result in a net economic benefit or undermine an essential and expanding sector.

Moreover, the assessment neglects the importance of environmental quality for tourism, particularly how unspoiled landscapes and dark skies enhance the visitor experience and support emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant gap in understanding its impacts on a recognised and growing segment of

the local economy.

Given the island community's limited economic diversification, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

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

Overall, the inability to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and consider the island's economic reliance leads to a significant evidential gap. This hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. It echoes the issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a comprehensive evidential basis for decision-making.

There are significant gaps in the baseline data, an undefined design envelope is used, unspecified mitigation measures are relied upon, and crucial impact pathways are omitted. These include considerations for nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to present a complete Social Impact Assessment represents a serious omission. Such deficiencies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, as it does not sufficiently demonstrate protection of biodiversity, natural places, and cultural heritage. It fails to indicate acceptable health and wellbeing impacts and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both

offshore and onshore components have not been adequately evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments relating to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and barring a lawful conclusion about the acceptability of impacts.

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

In summary, the application is procedurally and substantively unsuitable for determination. The significant information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to obtain 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: EF5739CD

