

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection stems from a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing material deficiencies in planning, environmental considerations, cultural factors, and procedural aspects. 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. The design, scale, and proximity of the proposal raise significant concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The documentation fails to provide a sufficient evidential basis for a lawful determination. It is noted that critical environmental data is absent, baseline information is both limited and inconsistent, and essential details of the proposal remain undefined. The application employs a flexible design framework, which obscures an understanding of likely significant effects. Furthermore, the reliance on unspecified mitigation measures inhibits an assessment of their effectiveness. Consequently, the materials presented do not facilitate a comprehensive or informed understanding of potential environmental, cultural, or community impacts. Claims of negligible or non-significant effects lack robust evidence.

There are substantive conflicts with policy that must be acknowledged. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such policy conflicts directly relate to the statutory tests required for consent and impede the competent authority's ability to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal raises alarm, particularly due to the large turbines being positioned in close proximity to the shoreline. This raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Together, the lack of adequate information, dependence on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle must be applied.

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.

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of the impacts on fisheries and marine life, failing to provide a solid evaluation of both ecological and socio-economic factors. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, there is no demonstration that these vital habitats and activities can be preserved without significant disruption.

A major concern is the assumption that fishing activity can simply be relocated without adverse effects. The application does not provide evidence regarding the availability or accessibility of alternative fishing grounds that could sustain additional pressure. This oversight is critical because displacing fishing efforts could lead to overfishing in other areas and result in broader economic repercussions for the local fishing fleet. Without a rigorous, evidence-based assessment, the implications for both fisheries and livelihoods remain unclear.

The proposal poses considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. Extended periods of high-energy hammer piling are expected to disturb marine life over significant distances, affecting species including dolphins. The anticipated disturbance to a notable segment of the local bottlenose dolphin population raises serious issues. Yet the application minimises these effects without adequate supporting evidence, which is concerning.

Moreover, there exists a contradiction within the application regarding the need for licences to authorise harm to European Protected Species while concurrently classifying the impacts as negligible. This inconsistency undermines the reliability of the assessment and raises questions about compliance with the Habitats Regulations, especially in contexts where harm is anticipated to a level requiring legal permission.

Additionally, the assessment overlooks cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The absence of a thorough evaluation of these combined effects means that the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

From a policy standpoint, the application does not meet the standards set by 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, which obstructs any conclusion regarding its sustainability.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the

assessment flawed and unreliable. These shortcomings inhibit a thorough evaluation of the impacts on marine life and fisheries.

TOURISM

The economy of the Isle of Lewis significantly relies on tourism, which has grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this importance, the application does not model the potential impacts of offshore infrastructure on the tourism sector, particularly concerning visitor numbers, behaviour, or overall economic contributions. The assessment overlooks the industrialisation of the seascape and the potential loss of environmental quality, failing to evaluate how these factors could affect Tourism Gross Value Added and the overall resilience of the local economy.

Tourism is fundamentally reliant on the area's wild coastline, unspoiled landscapes, dark skies, and sense of remoteness. The application acknowledges that 86% of visitors are attracted by scenery but lacks a quantified analysis of how large-scale developments might influence this attraction. The omission of a Dark Skies Assessment further exacerbates the deficiencies in the evaluation, leaving significant uncertainties about impacts on emerging markets like nature-based tourism and astro-tourism.

The implications of failing to assess tourism impacts extend beyond the sector itself, affecting employment, local businesses, and community sustainability in a context where economic diversification is already limited. The absence of a compliant Island Communities Impact Assessment means that critical economic vulnerabilities related to tourism have not been properly examined, contrary to the requirements set out under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not meet the standards of the National Planning Framework 4 regarding economic impact and the necessity of demonstrating a net benefit. It conflicts with strategic objectives that position tourism as a key growth sector and lacks the evidence needed for competent authorities to fully understand the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and recognise the island's economic dependency creates a substantial evidential gap. This deficiency hinders a thorough evaluation of the economic effects and underscores the incompleteness of the application.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal embodies significant shortcomings in relation to sustainable development, as assessed against statutory requirements, national policy, and evidential standards. This application raises similar concerns to those that led to the rejection of the Lewis Wind Power proposal in 2008, particularly regarding 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 falls short of these expectations.

There are notable deficiencies in the evidential basis provided for the application. It lacks complete baseline data and continues to use an undefined design envelope, while also relying on unspecified mitigation measures. Furthermore, critical impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, which violates the statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment constitutes a significant omission. These issues 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 conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impact of offshore and onshore elements has not been properly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty looms over environmental risks, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. These assessments display internal inconsistencies and do not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal is set to cause substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and impacts on tourism are all permanent effects that cannot be mitigated adequately.

In summary, the application is fundamentally flawed both procedurally and substantively. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. Therefore, the competent authority is urged to refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Additional Comments

This will have an impact on marine life. There will likely be an affect on tourism. Whilst visitor numbers may not decrease, their appreciation of Lewis and Scotland as a whole

will be altered.

There are surely better places to position a large off-shore wind farm that will have fewer detrimental impacts on citizens. I am pro wind farms but they have to be in the right places and further offshore

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: 1461E6D0

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Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on an examination of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies related to planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural identity. Concerns arise from the scale, design, and proximity of the proposal, which raise questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential foundation necessary for a lawful decision. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Moreover, key elements of the proposal remain undefined, leading to ambiguity in understanding potential significant effects. The use of a flexible design framework complicates the ability to assess these effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

There exist substantial conflicts with established policies. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and well-being. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for obtaining consent and compromise the competent authority's ability to determine the project's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises significant issues concerning landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation, evidential shortcomings, and clear policy violations indicate that the application is incomplete and does not support a lawful determination. In light of these circumstances, it is essential that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not offer a clear or dependable account of the potential environmental effects of the proposal. The application employs a flexible Project Design Envelope without committing to specific turbine dimensions or layouts, which creates considerable uncertainty. This flexibility hinders the ability to apply a worst-case scenario consistently and compromises the assessment's integrity. As a result, the impacts presented may not accurately represent the development that will ultimately be built, which limits both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

Additionally, the application depends significantly on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent based on the expectation that environmental harm will be addressed later undermines any meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information to stages following consent is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates clear identification of likely significant effects and mitigation before determination.

There are substantial evidential shortcomings, such as gaps in baseline data and limitations in methodology, alongside reliance on assumptions instead of site-specific evidence. Consequently, there is uncertainty regarding the scale and significance of impacts, especially where findings of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

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

In summary, the combination of an undefined design envelope, unspecified mitigation, and deficiencies in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and thorough assessment of environmental effects and indicate that the competent authority cannot make a determination based on the provided information.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is fundamentally inadequate and fails to meet the statutory obligations set forth by the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned evaluation of realistic alternatives based on environmental impacts, the application provides a

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

There is a clear lack of transparent, evidence-based comparisons concerning offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has seriously considered the potential for placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining the extent of impact make the absence of such analysis significant. This void prevents any conclusion that the proposed siting is indeed the least damaging option available.

The issues extend to the evaluation of cable routing and landfall assessments, as there is insufficient evidence indicating that alternative routes have been adequately considered to avoid or lessen impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy to avoid such impacts, combined with the absence of comparative analysis, suggests that mitigation by design has not been adequately applied, resulting instead in a reliance on post-design measures to address potential harm.

Consequently, the application does not demonstrate that environmental harm has been sufficiently minimised through careful site selection, layout, and the routing of infrastructure. This is indicative of a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a comprehensive assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this shortcoming compromises adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community well-being. The lack of a structured and comparative assessment is a significant omission that contributes to the overall determination that the application has not undergone adequate evaluation and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application presents an assessment of marine ecology and protected species that is fundamentally flawed, lacking a complete understanding of the ecological receptors within the West Lewis coastal environment. This area is notably sensitive and biologically active, yet the baseline data is insufficient and the methodologies employed fail to accurately capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment does not provide a credible evidential basis for evaluating potential impacts.

A significant gap in this assessment pertains to otters, which are classified as a

European Protected Species. The application does not adequately recognise or assess otters' active utilisation of coastal areas for foraging and movement. The failure to address their core foraging ranges and behavioural patterns means that potential impacts from construction disturbance, noise, and increased activity have not been properly evaluated. This oversight undermines any assertions regarding the lack of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This methodological choice likely results in an underestimation of their presence, especially when compared to established land-based observations that demonstrate frequent use of these waters. The omission or inadequate consideration of such data leads to an incomplete baseline and compromises the reliability of the conclusions reached.

Due to these methodological weaknesses, conclusions indicating negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of adequate baseline data also hampers a meaningful evaluation of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This situation generates uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to properly identify or assess protected species. The resulting uncertainty inhibits the ability to exclude adverse effects beyond reasonable scientific doubt, thereby necessitating adherence to the precautionary principle. Under these conditions, consent cannot be legally granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

In a fundamental contradiction, the developer asserts that there will be no significant

adverse effects, while simultaneously putting forward a Habitats Regulations derogation case, which is mandated only where significant harm is anticipated. This inconsistency raises serious questions regarding the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available. Moreover, the assessment does not sufficiently prove that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not thoroughly acknowledged, and the reliance on modelling introduces a degree of uncertainty, particularly concerning species in critical decline like Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality rates, especially in light of incomplete baseline data and a lack of understanding of behavioural responses.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy of the assessment regarding cultural heritage and community identity cannot be overstated. It fundamentally overlooks the West Lewis coastline, which should be recognised as a dynamic cultural landscape where the interplay of environment, language, tradition, and community is essential. The application simplistically treats heritage as disconnected, static entities, ignoring their ongoing social, cultural, and spiritual relevance within the community.

Particularly concerning is the treatment of sites that hold deep cultural significance, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they are active sites for burial and spiritual practice. By failing to

acknowledge their continued use and meaning, the assessment provides an incomplete understanding of the cultural effects of the development, thereby neglecting their vital role in community life.

Moreover, the assessment lacks consideration for intangible cultural heritage, which encompasses the Gaelic language, traditions, and the enduring bond between the community and the coastal environment. These elements are integral to the area's identity, yet they are wholly absent from the assessment, highlighting a severe oversight. Without addressing these aspects, the true cultural impact of the development remains obscured.

Equally troubling are the concerns surrounding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the validity of the assessment and ignores established principles that should guide participation in matters affecting cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment is a critical procedural shortcoming, as mandated by the Islands (Scotland) Act 2018. The lack of this assessment hinders the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, which alone compromises the legality of the determination.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and the failure to recognise living cultural practices indicate a clear divergence from policy requirements.

In summation, the collective failure to address living heritage, intangible cultural value, community rights, and statutory requirements leads to a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application does not offer a sound basis for understanding the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report remains unpublished. This significant evidential gap obstructs both the public and the competent authority from grasping the complete extent of social risks identified in the developer's own research. Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement rather than speculation, but the failure to disclose the full assessment hampers proper scrutiny of the findings and limits the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings acknowledging "cultural loss." Despite this recognition, these impacts have not been adequately incorporated into the main application or assigned appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be compromised. By not providing the complete dataset, the application fails to offer a comprehensive evidential basis for evaluating the balance between benefits and harm.

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

The procedural implications of this situation are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment, which constitutes a material omission within the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and strengthens the argument that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the installation of large-scale turbines along the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped landscape, and profound sense of remoteness. This development would introduce a continuous and dominant industrial presence that fundamentally alters the region's character, leading to a permanent and irreversible transformation of the landscape.

The assessment of visual impacts associated with this proposal is significantly lacking, failing to accurately represent the magnitude of change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, severely affecting visual amenity and undermining the region's defining qualities of naturalness and remoteness. There is a clear failure to convey the extent of these impacts and their significance in relation to the sensitive nature of the landscape.

Methodological flaws further compromise the assessment, particularly in the selection

and presentation of visual viewpoints. Evidence indicates that these viewpoints do not adequately capture the most sensitive receptors or potential worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises concerns about the accuracy of the reported visual impact and questions the reliability of the overall assessment.

Moreover, the relationship between landscape, seascape, and cultural heritage has not been sufficiently addressed. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape interconnected with the Atlantic horizon. The assessment treats these heritage assets as isolated entities rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and diminishing their relationship with the natural horizon. This not only represents a visual impact but also entails broader cultural and spatial harm that has not been properly evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of the proposed changes is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further erodes any claims of policy compliance.

Finally, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, not reducible to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and strengthen the argument that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

nature of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and critical habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on strategies to prevent, control, or monitor these risks.

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

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

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

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

FISHERIES AND MARINE LIFE

The proposal presents significant deficiencies in assessing the impacts on fisheries and marine life. It lacks a thorough evaluation of ecological and socio-economic consequences, particularly given the diverse marine ecosystem and the active fishing industry off the West Lewis coast. The application does not adequately demonstrate that these habitats and uses can be protected or maintained without substantial disruption.

A critical concern is the flawed assumption that fishing activities can be displaced without any repercussions. The absence of evidence regarding the availability or accessibility of alternative fishing grounds capable of absorbing additional pressure is a

crucial omission. This gap raises serious risks of overfishing in other areas, which could have broader economic implications for the local fishing fleet. The lack of a clear, evidence-based assessment means the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is likely to cause disturbances over extensive distances, significantly affecting species such as dolphins. The potential disruption to a large proportion of the local bottlenose dolphin population is a major concern, yet the application diminishes the importance of these impacts without adequate supporting evidence.

There are evident inconsistencies within the application, where the requirement for licences to permit harm to European Protected Species is acknowledged, yet the impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises serious questions regarding adherence to the Habitats Regulations, especially where harm is anticipated to an extent necessitating legal authorisation.

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

From a policy standpoint, the application does not align with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently demonstrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity. This absence of compliance prevents any conclusion that the proposal represents sustainable development.

In summary, the overall lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment all contribute to a conclusion that is incomplete and unreliable. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application raises substantial concerns regarding the integrity of its assessment, particularly in relation to the onshore infrastructure, which remains materially incomplete. This approach treats the offshore turbines and onshore works as separate entities, which obscures the full scope of the environmental and socio-economic effects associated with what is fundamentally a single integrated project.

One of the critical components of the onshore works involves the routing of cabling across protected moorland and the construction of a substation in proximity to

Stornoway. This activity necessitates excavation across areas rich in deep peat, notably within Barvas Moor, an ecologically sensitive habitat that serves as a significant carbon store. However, the application fails to provide a thorough assessment of these impacts, thereby inhibiting a complete understanding of the project's environmental footprint.

The omission or postponement of onshore impact assessments results in an inability to accurately evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be assessed together; yet, the current separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are notable risks posed to sensitive habitats, including machair systems and peatland environments, which receive policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been thoroughly evaluated or that appropriate avoidance measures have been implemented. This deficiency signifies a significant evidential gap in terms of biodiversity protection.

The proposal also raises important issues related to carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially creating a carbon debt that contradicts the fundamental goals of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, which raises doubts about the project's deliverability and lawful implementation.

From a policy perspective, the failure to assess the project comprehensively and to demonstrate protection for peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further compromises the integrity of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of assessment regarding dark skies and nocturnal wildlife represents a critical flaw within the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would create a visible and intrusive "wall of light"

across the western horizon, risks fundamentally transforming the night-time environment.

Moreover, the proposal fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of consideration is particularly troubling given the significance of dark skies to the region's identity and the growing tourism sectors, including astro-tourism. Consequently, there is a substantial gap in the overall landscape and environmental assessment due to these omissions.

A more pressing concern is the lack of evaluation regarding impacts on nocturnal wildlife. Numerous species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are known to be highly sensitive to artificial lighting. Such exposure can lead to disorientation and an increased risk of collision, yet the application does not incorporate any assessment of lighting impacts or a phototaxis study. The failure to consider how aviation lighting may affect these species or increase mortality is a significant oversight.

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

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

From a policy standpoint, these omissions conflict with the National Planning Framework 4, which pertains to the safeguarding of natural places and environmental quality. This deficiency also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time is an integral aspect of the environment.

In summary, the lack of any assessment concerning 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 unfit for a lawful determination.

TOURISM

The assessment of tourism impacts within the application is inadequate and does not address the economic and social ramifications for a vital segment of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, nearly untouched

landscape, dark skies, and sense of remoteness. It is noted that 86% of visitors are attracted by the scenery; however, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen notable growth, rising from £65 million in 2017 to more than £81.5 million, and it supports over 1,000 jobs, representing up to 16% of the island's economy. Yet, the application lacks a model to examine how the industrialisation of the seascape and deterioration of environmental quality might impact Tourism Gross Value Added or the broader economic resilience of the area. Without such critical analysis, it remains uncertain whether the development would provide a net economic benefit or hinder an established and expanding sector.

Furthermore, the assessment neglects the significance of environmental quality in promoting tourism, such as the value of unspoiled landscapes and dark skies to the visitor experience. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding the impacts on a recognised and burgeoning aspect of the local economy, including nature-based tourism and astro-tourism.

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 indicates that these economic vulnerabilities have not been adequately assessed, as mandated by the Islands (Scotland) Act 2018.

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm must be evaluated in light of its failure to meet the standards of sustainable development as dictated by statutory duties, national policy, and evidential requirements. It reflects the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly concerning 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 application remains deficient.

Critical gaps in baseline data are present, undermining the reliability of the evidential basis for determination. The proposal employs an undefined design envelope, relies on unspecified mitigation measures, and omits essential impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks completeness, inhibiting a comprehensive understanding of significant effects and residual impacts.

The procedural shortcomings are also significant. The absence of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018. Moreover, the failure to provide a full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues render the application unfit for determination.

Furthermore, the proposal conflicts with National Planning Framework 4, lacking adequate demonstration of biodiversity protection, natural area preservation, and cultural heritage safeguarding. It does not prove that health and wellbeing impacts are acceptable, nor does it present evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has been inadequately addressed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which could be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

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

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

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

Additional Comments

This development serves no genuine purpose, there is already a massive surplus in energy generated by wind, its only purpose is to make a profit for a foreign company.

Wind energy is not environmentally friendly it is inefficient and intermittent, and causes considerable harm the wildlife and people, and constitutes inexcusable destruction to the natural environment.

Stop supporting profiteering disguised
As environmentalism.

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: 839FE5CE

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 marine licensing and Environmental Impact Assessment procedures. The objection arises from a careful examination of the Environmental Impact Assessment Report and its supporting documentation, highlighting significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. Concerns are raised regarding the proposal's scale, proximity to the shoreline, and overall design, which may not align with statutory requirements, national policies, or the tenets of sustainable development.

The application is deficient in providing an adequate factual basis for a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and critical components of the proposal remain unclear. The flexible design framework utilised creates challenges in comprehending potential significant effects, while the dependence on unspecified mitigation strategies means that their effectiveness cannot be evaluated. Consequently, the documentation fails to furnish a comprehensive or informed understanding of the environmental, cultural, or community ramifications, with assertions of negligible or non-significant effects lacking robust evidential support.

Substantial policy inconsistencies are evident. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national mandates to safeguard biodiversity, address climate concerns, and maintain environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and compromise the capability of the competent authority to ascertain the development's acceptability under policy frameworks.

The proposal's unprecedented scale at this location, with large turbines placed near the coastline, raises significant concerns about landscape capacity, visual impact, and overall environmental consequences. Together, the lack of comprehensive information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy violations suggest that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings that compromise its reliability in evaluating the environmental implications of the proposal. A key concern is the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty, making it difficult to consistently apply a worst-case scenario. As a result, the assessment lacks integrity, preventing both the public and the competent authority from fully grasping the potential environmental effects of the development that may ultimately occur.

Moreover, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these conditions means environmental harm would only be addressed later, hindering a thorough evaluation of effectiveness or residual impacts. This postponement of critical information contravenes the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and the necessary mitigation be clearly established before any determination.

Additionally, there are notable evidential deficiencies, including gaps in baseline data and methodological limitations, compounded by a reliance on assumptions rather than site-specific evidence. This lack of thoroughness results in uncertainty about the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. Such deficiencies prevent a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly for protected species and sensitive habitats. Furthermore, the proposal fails to align with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is impossible to demonstrate that impacts have been thoroughly assessed or that adequate safeguards are established.

In conclusion, the combination of reliance on an undefined design envelope, the lack of specified mitigation measures, and the absence of sufficient baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These inadequacies hinder a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot make an informed decision based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application does not adhere to the necessary standards for assessing alternatives as required by the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned evaluation of viable alternatives based on their environmental impacts, it presents a narrative detailing the evolution of the project. This narrative approach fails to adequately prove that less harmful options have been thoroughly

identified and assessed in preference to more damaging alternatives.

There is a notable absence of a transparent, evidence-based comparison of different offshore locations, development scales, or design configurations. Specifically, the application lacks evidence that the developer has genuinely considered positioning turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical significance of proximity to the shore in assessing impact highlight the inadequacies of this analysis, making it impossible to conclude that the proposed siting is the least harmful.

Furthermore, these shortcomings extend to the assessment of cable routing and landfall options. The evidence does not convincingly show that alternative routes have been explored to avoid or minimise impacts on sensitive sites, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis indicates that there has been no application of mitigation by design; rather, the focus seems to be on post-design mitigation measures.

Consequently, the application fails to prove that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a significant oversight in following the established mitigation hierarchy, preventing the competent authority from determining whether there are less harmful and more suitable alternatives. In the absence of a thorough assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant option.

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 failure to provide a structured and comparative assessment is a material shortcoming that further supports the conclusion that the application has not undergone sufficient evaluation to warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to offer a complete or dependable understanding of the ecological receptors within the West Lewis coastal environment. This area is a sensitive and biologically rich marine system. However, the baseline data presented is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Particularly concerning is the neglect of otters, a species protected under European law, as the application does not adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. By overlooking their core foraging range and behavioural patterns, the assessment fails to consider the potential effects of construction disturbances, noise, and increased human activity. This oversight

undermines any conclusions regarding the lack of significant effects on otters.

There are also considerable shortcomings in the evaluation of basking sharks, where reliance on aerial surveys introduces a significant detection bias, especially under Atlantic conditions. This method is likely to lead to an underestimation of their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The disregard for such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws result in conclusions of negligible or non-significant effects that are based more on assumptions than on solid evidence. Furthermore, the lack of adequate baseline data hinders the meaningful assessment of cumulative and indirect impacts, which includes variations across seasons and broader ecosystem interactions. This lack of clarity creates uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess protected species. The uncertainties introduced by these deficiencies prevent the exclusion of adverse effects beyond reasonable scientific doubt, necessitating adherence to the precautionary principle. Under these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application raises significant concerns regarding its compliance with the evidential requirements for assessing impacts on biodiversity, particularly concerning internationally important seabird populations along the west coast of the Isle of Lewis. These populations are already in decline, and the application fails to demonstrate, to the necessary evidential standard, that these species will remain unaffected. The development is situated within critical foraging areas and migratory pathways, yet the assessment inadequately evaluates potential risks associated with displacement, collision, and habitat loss.

Furthermore, the conclusions drawn by the developer are fundamentally contradictory. While asserting that no significant adverse effects will occur, the application simultaneously puts forward a Habitats Regulations derogation case, which is only required if significant harm is anticipated. This inconsistency undermines the reliability of the ornithological assessment, indicating that the conclusions are not sufficiently supported by the evidence presented.

The assessment falls short in providing adequate evidence regarding the seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds is not thoroughly considered, and the reliance on modelling techniques raises uncertainties, especially for species that are in severe decline, like Kittiwakes and Fulmars. The methods employed are likely to underestimate mortality rates, particularly where baseline data is lacking and the behavioural responses of these species are not fully understood.

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

From a regulatory standpoint, the application does not meet the evidential threshold necessary to assert 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 fulfilled. This invokes the precautionary principle and hinders a lawful conclusion in favour of consent.

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

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

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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application's assessment of seascape, landscape, and visual impacts is deficient. It does not adequately convey the magnitude of the visual change that would occur. The scale and proximity of the turbines mean that they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the key qualities of naturalness and remoteness. Moreover, the assessment fails to properly represent this level of impact or its significance in the context of a sensitive landscape.

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life lacks depth and fails to provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these uses and habitats can be protected or maintained without causing significant disruption.

A critical concern is the assumption that fishing activities can be displaced without consequences. The application does not supply evidence indicating that alternative

fishing grounds are available, accessible, or capable of bearing additional pressure. This omission is crucial, as displacement could lead to overfishing in other areas and may result in broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and livelihoods remain inadequately understood.

The proposal raises considerable risks for marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended duration is expected to disturb marine life across considerable distances, affecting species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate supporting evidence.

There exists a clear inconsistency in the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, yet the impacts are simultaneously characterised as negligible. This contradiction undermines the assessment's credibility and raises concerns regarding adherence to the Habitats Regulations, especially in cases where harm is anticipated at a level that necessitates legal authorisation.

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

From a policy standpoint, the application does not establish compliance with 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, which hinders any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant deficiencies in its assessment of onshore infrastructure, which is critical to understanding the complete impact of what is essentially a single integrated project. The offshore turbines and the associated onshore works are interconnected, yet they are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects involved.

Onshore works encompass the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes

through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which is not only a vital carbon store but also an ecologically delicate habitat. The assessment fails to provide a thorough evaluation of these impacts, hampering a complete understanding of the project's overall environmental footprint.

Moreover, the omission or postponement of the assessment concerning onshore impacts hinders the ability to evaluate cumulative effects properly. The Environmental Impact Assessment process is designed to consider all components of a project collectively; however, the disparate treatment of offshore and onshore elements leaves the combined impacts on peatlands, habitats, and local communities inadequately understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The application does not show that it has fully assessed the impacts on these habitats or that suitable avoidance measures have been put in place, resulting in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding the carbon balance as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts renewable energy development goals. This issue has not been adequately addressed in the application, nor is there sufficient demonstration that the overall carbon balance remains advantageous.

Furthermore, routing 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, calling into question the deliverability and lawful implementation of the project.

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

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

TOURISM

The application does not adequately assess the impact on tourism, a crucial sector for the Isle of Lewis economy. This sector relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no quantitative analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall

economic contribution.

Tourism on the Isle of Lewis has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million. This growth supports more than 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 a decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the island. Without this crucial analysis, it remains unclear if the proposed development would generate a net economic benefit or harm an already established and growing sector.

The assessment neglects to address the significance of environmental quality in fostering tourism. Unspoiled landscapes and dark skies are vital to visitor experience, including emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable gap in understanding the impacts on a key and expanding part of the local economy.

In an island community with limited economic diversification, failing to evaluate the impacts on tourism carries broader ramifications for employment, local businesses, and community sustainability. The omission of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been assessed in accordance with the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and recognise the island's economic dependencies results in a significant lack of evidence. This hinders a thorough evaluation of the economic effects and supports the view that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails fundamentally to meet the criteria for sustainable development as required by statutory obligations, national policies, and evidential standards. This application reiterates the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, specifically regarding the unacceptable level of industrialisation. It is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and the wellbeing of the community.

A reliable and comprehensive evidential basis for the determination is not provided within the application. Significant deficiencies exist in baseline data, including the

continued use of an unspecified design envelope and an overreliance on unspecified mitigation measures. Furthermore, crucial impact pathways are omitted, such as those concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is inadequate, failing to allow for a complete understanding of likely significant effects or residual impacts.

There are also significant procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the complete Social Impact Assessment represents a substantial omission. These issues inhibit the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is inconsistent with National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural environments, and cultural heritage. Furthermore, it fails to provide evidence that health and wellbeing impacts are acceptable and lacks modelling of tourism impacts, which undermines claims of a net economic benefit. The cumulative effects of both offshore and onshore components have not been adequately assessed, thereby obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also internally inconsistent in certain aspects. The evidential requirement to dismiss adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

The proposal is set to induce substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, along with impacts on tourism, signify permanent consequences that cannot be mitigated to an acceptable degree.

Overall, the application is both procedurally and substantively unfit for determination. The extensive information gaps, alongside policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is obliged either to refuse consent on these bases or to invoke appropriate regulatory measures to require the submission of the missing information.

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

Additional Comments

I am writing to formally object to the proposed offshore wind farm development off the coast of the Isle of Lewis.

While I recognise the importance of transitioning to renewable energy, I have serious concerns about the scale, location, and potential consequences of this project. The waters surrounding Lewis are not only ecologically sensitive but also central to the identity, economy, and heritage of the local community. Industrialising this seascape risks causing irreversible harm.

Firstly, the environmental impact has not been convincingly addressed. The area is home to diverse marine life, including protected species of seabirds, seals, and migratory fish. The construction and operation of huge turbines, subsea cabling, and increased vessel traffic could disrupt habitats, alter migration patterns, and introduce long-term ecological stress. These risks appear to be understated in current assessments.

Secondly, the visual impact on one of Scotland's most unspoiled coastlines is significant. The Isle of Lewis is renowned for its natural beauty, drawing visitors from around the world. A development of this magnitude would fundamentally alter the character of the horizon, undermining both tourism and the cultural value of the landscape.

There are also concerns regarding the local economy. Fishing remains a vital livelihood for many in the area, and exclusion zones around turbines, along with construction disturbance, could restrict access to traditional fishing grounds. The long-term implications for these industries have not been adequately mitigated or compensated for.

Finally, there is a broader issue of fairness and local consent. Communities like those on Lewis often feel that large infrastructure projects are imposed upon them for the benefit of distant populations, with limited tangible local gain. Meaningful engagement and genuine consideration of local voices must be central to any decision of this scale, and at present, this feels insufficient.

In conclusion, I urge decision-makers to reconsider this proposal in its current form. A more balanced approach is needed—one that genuinely weighs renewable energy goals against environmental protection, cultural preservation, and the rights and livelihoods of local communities.

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: 6CD28773

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, revealing significant deficiencies related to planning, environmental impact, cultural considerations, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural heritage. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policies, and the principles of sustainable development due to its scale, proximity, and design.

A crucial issue is the inadequate evidential basis provided for a lawful assessment of the application. There are notable gaps in critical environmental data, while baseline information is both limited and inconsistent. Furthermore, important elements of the proposal remain undefined. The application employs a flexible design framework that hinders a clear comprehension of the potential significant effects, and it relies on unspecified mitigation measures, which precludes an evaluation of their effectiveness. Consequently, the documentation does not furnish a full or informed understanding of the impacts on environmental, cultural, or community aspects, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, the application presents clear and significant conflicts with established policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The proposal does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine whether the development is acceptable in policy terms.

The unprecedented scale of the proposal in this region, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of sustaining a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is unreliable and incomplete, failing to provide a full, transparent, or reliable account of the likely environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty and hinders a consistent application of a worst-case scenario. This compromises the integrity of the assessment, preventing both the public and the competent authority from comprehending the true extent of environmental impacts.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is fundamentally flawed and does not fulfil the statutory requirements outlined by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible alternatives based on their environmental effects, the application merely

recounts the evolution of the project. This narrative fails to establish that less harmful options have been adequately identified, assessed, and favoured over more damaging ones.

Furthermore, there is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has meaningfully considered positioning the turbines further offshore, an option that would likely mitigate visual, ecological, and coastal impacts. The critical sensitivity of the West Lewis coastline and the significant role of proximity to shore in evaluating impacts make this omission particularly concerning, as it obscures any conclusion that the proposed siting is the least harmful option.

The inadequacies are evident in the cable routing and landfall assessment as well, where there is insufficient documentation indicating that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive receptors. This includes regions of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy, coupled with the lack of comparative analysis, suggests that the approach taken has not incorporated mitigation by design, relying instead on measures intended for after the design phase.

As such, the application does not illustrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a disregard for the established mitigation hierarchy and hampers the competent authority's ability to determine whether less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it cannot be claimed that the proposal is sustainable or complies with policy guidelines.

From a policy standpoint, this inadequacy compromises alignment with National Planning Framework 4, especially concerning the safeguarding of natural environments, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a significant oversight that ultimately leads to the conclusion that the application has not been sufficiently evaluated and therefore cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the application is inadequate, resulting in a lack of a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the methodologies used fall short of capturing essential data on species presence, behaviour, and habitat utilisation. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

One critical gap in the assessment is the treatment of otters, classified as a European Protected Species. The application does not adequately recognise their active use of coastal regions for foraging and movement. This oversight regarding their core foraging

range and behavioural patterns leads to an insufficient evaluation of how construction disturbances, noise, and increased activity might affect them. Thus, the assessment's conclusions regarding the absence of significant effects on otters are fundamentally flawed.

The assessment also inadequately addresses basking sharks, relying heavily on aerial surveys which introduce considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The failure to include or give proper consideration to this data results in an incomplete baseline, undermining the reliability of the conclusions reached.

These methodological shortcomings mean that the claims of negligible or non-significant effects are primarily based on assumptions rather than solid evidence. The lack of sufficient baseline data hampers any meaningful evaluation of cumulative and indirect impacts, seasonal variations, and broader ecosystem interactions, leaving considerable uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species have not been conducted appropriately. This uncertainty prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, the granting of consent is not legally justifiable.

Overall, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the notion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The 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 evaluation of cultural heritage and community identity in the application is fundamentally flawed. It fails to recognise the West Lewis coastline as a vibrant cultural landscape, where environment, language, tradition, and community are intricately linked. Instead, the assessment takes a narrow approach, treating heritage merely as a collection of isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance to the community.

One significant shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These are active sites of burial and spiritual practice, yet the assessment categorises them as unchanging features, neglecting their ongoing use, significance, and how development could affect their surroundings. This mischaracterisation leads to an incomplete understanding of cultural impacts and overlooks the cemeteries' roles within community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These aspects are central to the region's identity and are

conspicuously absent from the assessment, which is a considerable oversight. The cultural impact of the development remains inadequately understood without these considerations.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity, akin to that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to recognised principles of participation in decisions that impact cultural and environmental interests.

A critical procedural failure is the absence of a valid 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 deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to recognise both tangible and intangible heritage, alongside living cultural practices, clearly deviates from policy requirements.

Overall, the neglect of living heritage, intangible cultural value, community rights, and legal obligations culminates in a substantial evidential gap. The cultural impacts of the development have not been adequately assessed, and the application lacks a solid foundation for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This lack of disclosure creates a significant evidential gap, hindering both the public and the competent authority from comprehensively understanding the social risks highlighted by the developer's own research. Summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement and are not speculative, yet the inability to access the complete assessment prevents proper scrutiny of these findings and limits the ability to gauge their significance within the decision-making framework.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” identified in the developer’s findings. Nonetheless, these impacts have not been fully incorporated into the main application or given the necessary weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development. This lack of transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and

functioning may be compromised.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence available indicates existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be established.

The procedural ramifications are considerable, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material flaw within the application and fails to meet the evidential requirements outlined by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment, obstructing a lawful determination and highlighting that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The current application presents significant shortcomings in its assessment of seascape, landscape, and visual impacts. It inadequately captures the scale of change and overlooks the sensitivity of the environment in question. The West Lewis coastline, characterised by its expansive Atlantic horizon and undeveloped landscape, possesses a profound sense of remoteness. Introducing large-scale turbines near the shore would result in a continuous industrial presence, fundamentally altering this cherished character and leading to a permanent transformation of the landscape.

The visual changes projected are not sufficiently articulated in the application. The sheer scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and compromising the intrinsic qualities of naturalness and remoteness. The assessment fails to communicate the extent of this impact and its significance within such a sensitive landscape context.

There are also notable methodological issues regarding the chosen visual viewpoints. Evidence indicates that these viewpoints may not adequately capture the perspectives of the most sensitive receptors or represent worst-case scenarios, particularly concerning culturally significant heritage sites and valuable landscapes. This raises concerns that the assessment may downplay the true magnitude of the visual impact, casting doubt on its reliability.

Moreover, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context, linked to the Atlantic horizon through visual and spatial relationships. By treating these sites as isolated entities, the assessment misses the crucial interdependence that informs their cultural significance, leading to an incomplete evaluation of impacts on their settings.

The industrialisation of the seascape poses a threat to these relationships, fundamentally altering how heritage assets are perceived and disconnecting them from their natural horizon. This situation represents more than just a visual impact; it inflicts a cultural and spatial harm that has not been sufficiently assessed.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the preservation of natural places and historic assets. The magnitude of the proposed change is at odds with the imperative to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of policy compliance.

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

In summary, the assessment fails to accurately convey the scale of the impact, the sensitivity of the environment, and the intertwined 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 vital landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

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

The absence of detailed emergency response procedures amplifies these concerns. By postponing contingency planning to a stage after consent, the application hinders the

evaluation of whether appropriate safeguards are established to handle pollution events. This deferral introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures during the determination process.

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

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

FISHERIES AND MARINE LIFE

The application fails to adequately assess the impacts on fisheries and marine life, lacking a strong evaluation of both ecological and socio-economic consequences. The coastal waters off West Lewis are home to a vibrant marine ecosystem and a thriving fishing industry. However, the proposal does not show how these habitats and uses can be preserved without causing significant disruption.

A major concern is the assumption that fishing activities can be moved without repercussions. The application does not provide any evidence that alternative fishing grounds are available or capable of supporting the increased pressure. This is a critical gap, as such displacement could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a solid, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to underwater noise generated during construction. Extended high-energy hammer piling may disturb species over large distances, affecting dolphins among others. The anticipated disturbance to a large portion of the local bottlenose dolphin population is concerning, yet the application minimizes these effects without sufficient evidence.

There is a notable inconsistency in the application, where the necessity for licenses to allow harm to European Protected Species is acknowledged, yet impacts are described as negligible. This contradiction raises questions about the reliability of the assessment and compliance with the Habitats Regulations, especially regarding anticipated harm that may require legal authorization.

Moreover, the application does not take into account cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A thorough 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 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, making it impossible to conclude that this proposal constitutes sustainable development.

In summary, the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the inconsistencies within the application contribute to an incomplete and unreliable assessment. These shortcomings hinder a proper evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development includes significant onshore infrastructure elements such as the construction of a substation near Stornoway, cabling across protected moorland, and 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. However, the application fails to provide a comprehensive assessment of these impacts, leaving a critical gap in understanding the overall environmental footprint of the project.

A significant concern arises from the fragmented assessment approach, which treats offshore turbines and onshore works separately despite their intrinsic link. This separation obscures the cumulative effects on peatlands, habitats, and local communities, which must be evaluated collectively as stipulated by the Environmental Impact Assessment process. The exclusion of onshore impacts undermines the ability to fully comprehend the project's overall implications.

Furthermore, there are serious risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protection. The application does not demonstrate a thorough assessment of potential impacts on these habitats or indicate that adequate avoidance measures have been considered, creating a notable evidential gap concerning biodiversity protection.

The proposal also raises critical questions about carbon balance, as the disturbance of peatland releases stored carbon, potentially creating a carbon debt contrary to renewable energy objectives. The application inadequately addresses this issue, failing to prove that the overall carbon balance remains advantageous.

Additionally, routing the infrastructure through active croft land poses conflicts with existing land uses and legal rights. There is no evidence that necessary consents or processes have been initiated, raising significant concerns about the feasibility and legality of the project.

Overall, the failure to assess the project comprehensively, combined with the lack of

evidence concerning environmental impacts and land use considerations, directly conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further casts doubt on the application, rendering it incomplete and unreliable, and preventing 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 within the application is fundamentally inadequate, failing to properly assess the economic and social ramifications for a crucial sector of the Isle of Lewis's economy. With tourism significantly relying on the area's wild

coastline, near-pristine landscapes, dark skies, and unique sense of remoteness, it is notable that 86% of visitors are attracted primarily by scenery. Nevertheless, the application lacks a quantified assessment regarding how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

The tourism sector has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and comprising up to 16% of the island's economy. However, the application neglects to model the potential impacts of the seascape's industrialisation and the consequent loss of environmental quality on Tourism Gross Value Added and the wider economic resilience of the region. Such an analysis is crucial to ascertain whether the proposed development would yield a net economic benefit or instead jeopardise an established and thriving sector.

Furthermore, the assessment does not take into account the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this oversight, resulting in a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a context where the island community exhibits limited economic diversification, the lack of evaluation regarding tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined, as mandated by the Islands (Scotland) Act 2018.

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

In summary, the overall inadequacy in quantifying tourism impacts, failing to assess the environmental factors influencing visitor behaviour, and disregarding the economic dependency of the island results in a significant evidential gap. This ultimately hinders a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies that undermine its compliance with sustainable development principles as outlined in statutory duties and national policy. Similar to the 2008 Lewis Wind Power proposal, which faced rejection due to unacceptable industrialisation, this application emerges under a policy framework that emphasises biodiversity, peatland protection,

landscape integrity, and community wellbeing. However, it falls short in several critical areas.

The evidential basis provided is neither complete nor reliable, with notable gaps in baseline data and an undefined design envelope. There is an overreliance on unspecified mitigation measures, and essential impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have been overlooked. Consequently, the Environmental Impact Assessment lacks the necessary depth to offer a clear understanding of significant effects and residual impacts.

Procedural issues further complicate the proposal. The absence of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, while the lack of a comprehensive Social Impact Assessment is a significant omission. These shortcomings hinder the competent authority's ability to evaluate the effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is fundamentally at odds with the National Planning Framework 4, failing to assure the protection of biodiversity, natural places, and cultural heritage. It does not adequately address health and wellbeing impacts, nor does it demonstrate a net economic benefit due to the absence of tourism impact modelling. The failure to properly assess the cumulative impacts of offshore and onshore components obscures potential effects on peatlands, carbon balance, habitats, and crofting land.

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

This proposal is poised to cause considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and adverse effects on tourism signify permanent changes that cannot be sufficiently mitigated.

In light of these concerns, the application is both procedurally and substantively unfit for determination. The myriad information deficiencies, policy conflicts, and unresolved environmental risks impede a lawful, evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be entirely refused.

Additional Comments

Why should we sacrifice our own backyard to subsidize cheaper electricity for southern England?

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: 15700C7B

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential detail and fails to provide a comprehensive, transparent account of the likely environmental impacts of the proposal. The flexible Project Design Envelope approach, which does not commit to

specific dimensions, layouts, or configurations of the turbines, introduces considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario and undermines the assessment's integrity, preventing both the public and the relevant authorities from fully understanding the true environmental implications of the development.

Moreover, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent based on the premise that environmental harm will be addressed at a later date, the application hinders any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contravenes the principles of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations are clearly established before any decision is made.

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

Consequently, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate alignment with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that adequate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application presents significant shortcomings in its assessment of alternatives, which fails to align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned evaluation of feasible alternatives based on their environmental impacts, it provides a narrative of the project's evolution. This method does not adequately demonstrate that less harmful options have been effectively identified, assessed, and selected over more damaging solutions.

There is a lack of transparent, evidence-based comparisons between alternative offshore locations, development scales, or design configurations. Notably, the developer has not sufficiently explored the possibility of placing turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be reduced. Given the sensitivity of the West Lewis coastline, along with the critical role that proximity to shore plays in determining impact, the failure to include such an analysis renders it impossible to ascertain whether the proposed siting is indeed the least damaging option.

These deficiencies also apply to the cable routing and landfall assessment, where evidence is insufficient to prove that alternative routes have been adequately considered to avoid or reduce impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy and a lack of comparative analysis suggest that mitigation by design has not been implemented, resulting in an over-reliance on post-design mitigation measures.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy, which inhibits the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a thorough alternatives assessment, it cannot be established that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies severely undermine compliance with National Planning Framework 4, particularly regarding the protection of natural spaces, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a material flaw that contributes to the overall conclusion that the application has not undergone adequate evaluation and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to provide a reliable understanding of the ecological receptors in the West Lewis coastal environment. This marine system is not only highly sensitive but also biologically active. Despite this, the baseline data is incomplete and the methodologies employed do not effectively capture species presence, behaviour, and habitat use, ultimately leading to an unreliable foundation for evaluating impacts.

A critical issue pertains to otters, classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that potential effects stemming from construction disturbance, noise, and increased activity have not been thoroughly evaluated. Such

deficiencies undermine any conclusions about the absence of significant effects on otters.

Additionally, the assessment of basking sharks is similarly compromised. The reliance on aerial surveys introduces a significant bias in detection, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks when compared to established land-based observations that show frequent use of these waters. The omission of relevant data in this regard leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that any conclusions drawn about negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual scale of risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainties introduced by these deficiencies prevent the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, granting consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamental contradiction by asserting that there will be no significant adverse effects, while simultaneously making a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the ornithological assessment, suggesting that the conclusions reached are not backed by adequate evidence. The assessment contains significant gaps and internal inconsistencies that undermine its validity.

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to provide sufficient evidence demonstrating that these species will not be adversely affected. Key foraging areas and migratory pathways are present in the development site, yet the assessment does not effectively evaluate the potential consequences of displacement, collision risk, or habitat loss for these birds.

The methodologies used in the assessment are likely to underestimate mortality rates,

particularly for species in severe decline, such as Kittiwakes and Fulmars. There is a significant reliance on modelling approaches, which introduces uncertainty regarding the true impact on seabirds associated with protected sites, including the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully accounted for, raising further concerns about the adequacy of the analysis.

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

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with the gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation activates the precautionary principle, which precludes a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies demonstrate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

In summary, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These flaws prevent a comprehensive evaluation of impacts and contribute to the overarching conclusion that the application does not satisfy the statutory requirements necessary for its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community are interconnected. The assessment of cultural heritage and community identity within the application fails fundamentally, as it adopts a reductive approach by treating heritage as a collection of isolated and static assets. This perspective neglects the ongoing social, cultural, and spiritual roles that these elements play within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are merely characterised as static features within the assessment. This mischaracterisation ignores their ongoing use, significance, and the potential impact of development on their surrounding environments. Consequently, the evaluation of cultural effects remains incomplete, and the essential role these sites hold within community life is disregarded.

The assessment further fails to account for intangible cultural heritage, which includes vital components such as the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These aspects are central to the identity of the area, yet they are completely omitted from the assessment, leading to a significant gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinctive cultural identity and is recognised as 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 regarding participation in decisions that affect cultural and environmental interests.

Moreover, a critical procedural failure exists in the absence of a compliant Island Communities Impact Assessment, a statutory requirement outlined in the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone hinders lawful determination.

From a policy standpoint, these deficiencies conflict directly with the 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, represents a departure from policy requirements.

When viewed collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts of the proposed development have not been adequately assessed, leaving the application insufficient for evaluating the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The procedural implications of this situation are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This omission within the application indicates a failure to meet the evidential standards required under the Environmental Impact Assessment regime.

Moreover, there is a significant deficiency in the assessment of social impacts, health, and wellbeing, which lacks the transparency needed for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been made available. This creates a considerable evidential gap, hindering both the public and the competent authority from comprehensively understanding the social risks highlighted in the developer's own research.

Available summaries reveal that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and are therefore not speculative in nature. Nonetheless, the failure to disclose the complete assessment obstructs proper examination of the findings and restricts the capacity to ascertain their significance in the decision-making process.

In addition, the proposal is perceived as a direct threat to community identity and cohesion, with “cultural loss” acknowledged in the developer's findings. Despite this recognition, such impacts have not been adequately incorporated into the main application or assigned appropriate significance. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly in relation to potential effects on community character and functionality. By failing to provide the complete dataset, the application does not offer a sufficient evidential foundation for weighing benefits against harm.

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

In conclusion, the combination of non-disclosure of the full Social Impact Assessment and the evidence of existing negative impacts renders the assessment incomplete and unreliable. This situation hinders a lawful determination and reinforces the assertion that the application lacks adequate information to support it.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts lacks sufficient detail and fails to represent the true extent of change to the environment and the sensitivity of the area. The coastline of West Lewis features an unspoilt Atlantic horizon, characterised by its undeveloped nature and a profound sense of remoteness. Should large-scale turbines be positioned near the shoreline, they would introduce a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible change in the landscape.

Moreover, the application does not adequately capture the magnitude of the visual change anticipated. The turbines would dominate the vistas from nearby residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the qualities that define naturalness and remoteness. The assessment

inadequately conveys the significance of this impact within such a sensitive landscape context.

Methodological issues also arise from the selection and presentation of visual viewpoints, which may not effectively represent the most sensitive receptors or worst-case scenarios. This is particularly relevant for key cultural heritage sites and areas of high landscape value. Such shortcomings risk underestimating the magnitude of visual impact, which undermines the reliability of the assessment process.

Additionally, the assessment neglects to consider the interconnected relationship among 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. This evaluation treats these assets in isolation, failing to recognise their interdependence and resulting in an incomplete assessment of impacts on their cultural significance and setting.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The anticipated changes are at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines claims of compliance with relevant policies.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks presented in this application is fundamentally incomplete, lacking the necessary detail to properly evaluate the potential environmental effects. Given the proposed substantial seabed preparation and installation works within a high-energy Atlantic environment, there are no fully developed Construction Environmental Management Plans or Pollution Prevention

Plans included. Instead, the application relies on vague mitigation and contingency measures that are to be formulated post-consent, which severely hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming when considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application prevents a thorough evaluation of whether appropriate safeguards are established to address pollution events. This creates procedural risks and undermines the capability of the competent authority to effectively assess environmental protection measures at the time of determination.

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

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These significant shortcomings obstruct a comprehensive evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal poses substantial risks to marine life and the local fishing industry, yet the assessment of fisheries and marine ecosystems is inadequate. The waters off the West Lewis coast are home to both a rich marine ecosystem and a vibrant fishing community. However, the application does not convincingly demonstrate how these vital uses and habitats can be preserved or sustained without significant disruption.

A critical concern is the presumption that fishing activities can be shifted without

adverse effects. The application lacks evidence regarding the availability or accessibility of alternative fishing grounds that could withstand increased pressure. This absence of information is troubling, as it raises the possibility of overfishing in other areas, potentially leading to broader economic ramifications for the local fishing fleet. Without a thorough, evidence-based evaluation, understanding the impacts on fisheries and associated livelihoods remains elusive.

Additionally, the proposal carries significant risks for marine species, particularly due to the underwater noise resulting from construction activities. Prolonged high-energy hammer piling is expected to cause disturbances over considerable distances, which may adversely affect species, including dolphins. The predicted disturbance to a notable portion of the local bottlenose dolphin population is a serious concern. Nonetheless, the application minimises the importance of these impacts without adequate supporting evidence.

There is a notable inconsistency in the application where the need for licenses to permit harm to European Protected Species is recognised, while simultaneously, impacts are described as negligible. This contradiction calls into question the reliability of the assessment and raises serious compliance concerns with the Habitats Regulations, especially when harm is anticipated to an extent that necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts stemming from multiple factors such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined pressures, it is impossible to determine the overall consequences for 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 provide evidence that the development can operate alongside existing marine users or mitigate unacceptable impacts on marine biodiversity, which precludes any conclusion that the proposal aligns with sustainable development principles.

In summary, the deficiencies in evidence concerning fishing displacement, the undervaluation of acoustic impacts, and the internal inconsistencies significantly undermine the assessment's credibility. These shortcomings hinder a comprehensive evaluation of the potential consequences for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves onshore infrastructure works associated with offshore turbines, yet the assessment of these onshore elements is fundamentally inadequate. The onshore components are interconnected with the offshore project, but their separate evaluations lead to a disjointed understanding of the overall environmental and socio-economic ramifications. This lack of a cohesive assessment obscures the full extent of the impacts stemming from what is essentially a singular project.

The onshore works entail cabling across protected moorland, construction of a substation near Stornoway, and the establishment of access infrastructure in sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly in Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application fails to offer a thorough evaluation of these impacts, thus hindering a complete understanding of the project's environmental footprint.

By deferring the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered in conjunction, but the compartmentalisation of offshore and onshore components means that the combined effects on peatlands, habitats, and local communities are not fully appreciated.

Moreover, the application poses substantial risks to sensitive habitats such as machair systems and peatland environments, which are safeguarded by policy. There is no demonstration that the impacts on these habitats have been comprehensively evaluated or that suitable avoidance measures have been enacted. This creates a significant evidential gap concerning biodiversity protection.

Concerns about carbon balance are also raised by this proposal. Disturbance of peatland can release stored carbon, possibly resulting in a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or prove that the overall carbon balance is favourable.

The routing of the infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, which questions the feasibility and lawful execution of the proposal.

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

In summary, the disconnection between project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and untrustworthy, impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to consider dark skies and nocturnal wildlife, representing a serious oversight. The proposed development would introduce permanent red aviation lighting that would be visible over long distances. This would

create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

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

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

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

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

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

TOURISM

The 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 fundamentally fails to meet the requirements of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application mirrors the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was established. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in numerous critical areas.

There are significant gaps in the baseline data provided, reliance on an undefined design envelope, and a lack of specified mitigation measures. Additionally, key impact pathways have been omitted, including those concerning nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to enable a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The absence of a compliant Island Communities Impact Assessment breaches statutory duties established under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment is a material omission. These deficiencies inhibit the competent authority from accurately assessing impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal also contradicts National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural places, or cultural heritage. It fails to present acceptable health and wellbeing impacts and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Moreover, the cumulative impact of both offshore and onshore elements has not been thoroughly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

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

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

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

Additional Comments

Without due consideration or consultation of the people and communities of Lewis, many of whom are friends, ex colleagues and acquaintances, this harks back to times of oppression of the highland and islands culture and way of life. Companies and governments deciding on outcomes, somewhere out the way, of their own eyes. The impact this will have on so many aspects of the Lewis community, environment and the island itself, is monumental.

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: 75853C8C

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough examination of the Environmental Impact Assessment Report and the associated documentation, highlighting significant deficiencies in planning, environmental considerations, cultural implications, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, nearly pristine environment, and strong cultural heritage. Concerns about the scale, proximity, and design of the project raise questions regarding its alignment with statutory obligations, national policies, and the tenets of sustainable development.

The application does not present a sufficient evidential foundation for a lawful assessment. Essential environmental data is absent, baseline information is both limited and inconsistent, and critical components of the proposal are yet to be defined. The adoption of a flexible design framework obfuscates the likely significant effects of the development, while an over-reliance on unspecified mitigation measures precludes any meaningful evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community repercussions, with assertions of negligible or non-significant impacts lacking robust evidential support.

Substantial policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment process, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately prove that it can satisfy national directives aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly relate to the statutory criteria necessary for obtaining consent and hinder the competent authority's ability to conclude that the development aligns with policy standards.

The magnitude of the proposal is unprecedented for this area, with large turbines situated in close proximity to the shoreline, thus raising significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations indicate that the application is incomplete and cannot facilitate a lawful determination. In this context, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report submitted is fundamentally inadequate and lacks a comprehensive, transparent, and dependable account of the anticipated environmental impacts of the proposed development. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates considerable uncertainty. This uncertainty hinders the ability to apply a worst-case scenario consistently, thereby undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the actual development, leaving both the public and the competent authority without a clear understanding of the true environmental effects.

Furthermore, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. This results in seeking consent on the premise that any environmental harm will be managed at a later date. Such a deferral to post-consent stages hinders any meaningful evaluation of effectiveness or assessment of residual impacts. This procedural approach is unacceptable and contradicts the purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies must be clearly established before a determination can be made.

There are 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 scale and significance of impacts, especially where conclusions are drawn about negligible or non-significant effects without robust supporting data. The lack of adequate information precludes a clear understanding of cumulative and worst-case impacts, and introduces scientific uncertainty that cannot meet statutory requirements.

As a result, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate alignment with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, since it cannot be established that impacts have been fully assessed 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 obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make a determination based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The analysis of marine ecology and protected species is fundamentally inadequate, resulting in an unreliable assessment of ecological receptors within the West Lewis coastal environment. This area represents a sensitive and biologically rich marine

ecosystem, yet the existing baseline data remains incomplete. The methodologies implemented fail to effectively document species presence, behaviour, and habitat use. Consequently, the assessment does not furnish a solid evidential basis necessary for evaluating potential impacts.

A notable deficiency is found in the treatment of otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or assess the active usage of coastal zones by these animals for foraging and movement. The oversight concerning their core foraging range and behaviour significantly undermines the evaluation of potential construction-related disturbances, noise, and increased activity, leading to a failure to adequately consider the potential effects on this species.

The evaluation of basking sharks also presents significant shortcomings, particularly due to an overreliance on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent utilisation of these waters. The neglect to incorporate or adequately assess such data culminates in an incomplete baseline, thereby diminishing the trustworthiness of the conclusions drawn.

These methodological shortcomings result in findings of negligible or non-significant effects being based on unsubstantiated assumptions rather than robust evidence. The lack of comprehensive baseline data precludes a meaningful examination of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to adequately identify and assess protected species. The uncertainty generated by these deficiencies obstructs the ability to dismiss adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, the law does not permit the granting of consent.

In conclusion, the amalgamation of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These weaknesses preclude a thorough evaluation of the impacts on marine ecology and protected species, leading to the overall assertion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposal involves the development of turbines within a designated migratory corridor on the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is materially flawed, containing significant

gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment does not adequately demonstrate, to the required evidential standard, that these species will not be adversely affected. It fails to robustly evaluate critical factors such as displacement, collision risk, or habitat loss associated with the proposed development, particularly given its location within key foraging areas and migratory pathways.

A fundamental contradiction is evident in the application. While the developer claims there will be no significant adverse effects, it simultaneously puts forth a Habitats Regulations derogation case, which is necessitated only in scenarios where significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that its conclusions lack proper support from the underlying evidence. The assessment inadequately addresses the potential effects on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda, failing to fully account for the significance of these feeding grounds. The reliance on modelling approaches introduces a layer of uncertainty, particularly for species that are already experiencing severe declines, like Kittiwakes and Fulmars. Consequently, the methodologies used may underestimate mortality rates, especially in light of incomplete baseline data and a lack of understanding of behavioural responses.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding the cultural heritage and community identity of the West Lewis coastline is fundamentally deficient. It fails to recognise this area as a living cultural landscape where the environment, language, tradition, and community are

intricately connected. The application adopts a simplistic view, treating heritage merely as isolated and static assets, rather than appreciating their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and spiritual sites, yet the assessment incorrectly categorises them as static features. This oversight neglects their continued use and meaning, as well as the implications of development on their surroundings. Consequently, this misrepresentation leads to an inadequate evaluation of cultural impacts and ignores their essential role in community life.

Additionally, the assessment does not consider intangible cultural heritage, such as the Gaelic language and traditions, nor the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity and are completely overlooked, which constitutes a significant omission. Without taking these factors into account, the cultural impact of the proposed development cannot be accurately gauged.

Concerns extend to community rights and engagement, particularly regarding the Gaelic-speaking population, which possesses a unique cultural identity with characteristics of an Indigenous People. However, the application lacks a process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the legitimacy of the assessment and disregards established principles of participation in decisions impacting cultural and environmental interests.

Moreover, a critical procedural failure is the omission of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority's ability to fulfil its legal duty to evaluate the social, cultural, and economic effects on the island community. This 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 neglect to consider both tangible and intangible heritage, alongside living cultural practices, clearly deviates from established policy requirements.

In summary, the collective failures to assess living heritage, intangible cultural values, community rights, and statutory obligations lead to a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application fails to provide a robust foundation for evaluating the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment fails to adequately reflect the scale of change and the sensitivity of the receiving environment. The West Lewis coastline, characterised by its open Atlantic

horizon, undeveloped nature, and pronounced sense of remoteness, would face a fundamental alteration due to the introduction of large-scale turbines near the shoreline. This would create a continuous and dominant industrial presence, resulting in a permanent and irreversible transformation of the landscape.

Moreover, the application does not sufficiently represent the magnitude of the visual change, as the scale and proximity of the turbines would significantly dominate views from residential areas, historic sites, and popular coastal locations. Such changes would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to convey the significance of these impacts in relation to a sensitive landscape.

There are substantial methodological concerns regarding how visual viewpoints were selected and presented. It appears that the chosen viewpoints may not fully reflect the most sensitive receptors or represent worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, compromising the reliability of the assessment.

Additionally, the interconnected relationship between landscape, seascape, and cultural heritage has not been adequately considered. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context linked to the Atlantic horizon by visual and spatial relationships. The assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital relationships, fundamentally altering how heritage assets are perceived and disrupting their connection to the natural horizon. This represents not merely a visual impact but a broader cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The proposed changes are incompatible with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further undermines any assertion of policy compliance.

Finally, 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. Therefore, the resulting changes are fundamental and permanent, rather than amendable to an acceptable level through mitigation.

In conclusion, 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 assertion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the assessment of construction and pollution risks, which is both incomplete and lacking the necessary detail to properly evaluate likely environmental effects. There is a substantial undertaking involved in seabed preparation and installation works within the challenging high-energy Atlantic environment. However, the application fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it leans on vague mitigation and contingency measures to be established after consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming, especially in light of 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. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer sufficient information on how these issues will be prevented, controlled, or monitored.

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

Compounding these concerns is the absence of detailed emergency response procedures. By deferring contingency planning until after consent has been granted, the application hampers the ability to evaluate whether adequate safeguards are in place to address pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures prior to determination.

From a regulatory standpoint, deferring critical environmental safeguards stands in direct conflict with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed before consent is granted; without this information, a lawful determination cannot be made. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts results in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, further reinforcing the view that the application is incomplete.

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding the assessment of fisheries and marine life, which is inadequate and fails to deliver a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal does not adequately demonstrate how these essential uses and habitats will be protected or maintained without substantial disruption.

A critical flaw in the application is the assumption that fishing activities can be relocated without adverse effects. There is no evidence provided that suggests alternative fishing grounds are available or able to handle increased pressure. This lack of information is particularly concerning, as displacing fishing activities could lead to overfishing in other areas and have broader economic implications for the local fishing fleet. An evidence-based assessment is necessary to understand the potential impacts on fisheries and local livelihoods.

Furthermore, the proposal poses considerable risks to marine species, especially due to underwater noise generated during construction. The prolonged use of high-energy hammer piling is expected to disturb marine life across extensive areas, with species such as dolphins likely to be significantly affected. The application fails to adequately address the predicted disturbance to a considerable portion of the local bottlenose dolphin population and downplays the significance of these effects without sufficient supporting evidence.

There is also an evident contradiction within the application regarding the licensing needed to harm European Protected Species, while simultaneously asserting that such impacts are negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, particularly in scenarios where harm may necessitate legal authorisation.

Additionally, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is vital to determining the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not prove adherence to the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with existing marine users or avert unacceptable impacts on marine biodiversity, thus hindering any conclusion that the proposal signifies sustainable development.

In summary, the deficiencies highlighted—such as the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies—render the assessment incomplete and unreliable. These issues obstruct a robust evaluation of the impacts on marine life and fisheries.

TOURISM

The evaluation of tourism impacts in the application is inadequate, lacking a thorough examination of the economic and social effects on a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application states that 86% of visitors are attracted by the scenery, but it fails to provide a quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or overall economic contribution.

The tourism sector has seen considerable growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs. It accounts for up to 16% of the island's economy. However, the application does not model the potential impacts of seascape industrialisation and environmental degradation on Tourism Gross Value Added or the broader economic resilience. This lack of analysis makes it impossible to ascertain whether the proposed development would generate a net economic benefit or threaten a key and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality for tourism, failing to acknowledge how unspoiled landscapes and dark skies enhance visitor experiences and support niche markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further highlights this shortcoming, creating a substantial gap in understanding the implications for an acknowledged and growing segment of the local economy.

In a community with limited economic diversity, neglecting to assess tourism impacts raises broader concerns for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been addressed as required by the Islands (Scotland) Act 2018.

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

Overall, the lack of quantification regarding tourism impacts, failure to assess environmental factors influencing visitor behaviour, and disregard for the economic dependency of the island culminate in a significant evidential gap. This shortfall inhibits 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 and does not meet the requirements of sustainable development as outlined in

statutory duties and national policy. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal still fails to address these concerns adequately.

There are significant gaps in the evidential basis for the proposal. It does not include comprehensive baseline data and continues to utilise an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and omits critical impact pathways, such as those related to nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, limiting the understanding of likely significant effects and residual impacts.

Procedural issues also mar the application. The lack of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts with the National Planning Framework 4 as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling has not been conducted. The assessment of the cumulative impact from both offshore and onshore elements is inadequate, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority should refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Additional Comments

As a visitor to these spectacular islands I believe wind farms should only located in areas that would cause little to no impact to an area with diverse wildlife in and out of the water, so therefore I strongly object to this particular 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: B2EAC47E

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

Dear Sir/Madam

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

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

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

Given the unprecedented scale of the proposal, with large turbines positioned close to the shoreline, there are significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy illustrates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species reveals significant deficiencies that undermine its reliability and effectiveness. This coastal environment of West Lewis is particularly sensitive and biologically rich, yet the baseline data

presented is inadequate. The methodologies used fail to comprehensively capture the presence, behaviour, and habitat usage of key species. Consequently, this shortfall renders any assessment of impacts to be speculative rather than grounded in solid evidence.

Otters, classified as a European Protected Species, are notably overlooked in this assessment. The application neglects to properly evaluate their active foraging and movement patterns along the coast. The absence of an assessment of their core foraging range means that potential disturbances from construction activities, noise, and increased human presence have not been sufficiently evaluated. This oversight fundamentally weakens any claims made regarding the lack of significant effects on otters.

In addition, the evaluation of basking sharks suffers from methodological flaws. The reliance on aerial surveys, particularly in challenging Atlantic weather conditions, introduces a significant bias in detection rates. This approach is likely to underestimate the actual presence of basking sharks in the area, especially when juxtaposed with established land-based observations that highlight their frequent utilisation of these waters. Such omissions further compromise the baseline data and diminish the credibility of the conclusions drawn.

The inadequacies in methodology result in conclusions of negligible or non-significant effects that are more reliant on assumptions than on robust scientific evidence. Furthermore, the lack of adequate baseline data hampers the ability to assess cumulative and indirect impacts, seasonal variations, and interactions within the wider ecosystem. This creates a substantial degree of uncertainty regarding the real risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the obligations set out in the Environmental Impact Assessment regime and National Planning Framework 4. The failure to appropriately identify and assess protected species leads to heightened uncertainty, making it impossible to exclude adverse effects beyond reasonable scientific doubt. The application thus engages the precautionary principle, indicating that consent cannot be granted lawfully.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is fundamentally insufficient, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community interweave. The application adopts a narrow perspective, viewing heritage as a collection of isolated, static assets, failing to

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

A notable shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These active sites of burial and spiritual practice are mischaracterised as static features, with the assessment neglecting their continued use and meaning, as well as the impact that development could have on their setting. This inadequate representation leads to an incomplete understanding of cultural effects and disregards their role in community life.

Additionally, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language and traditions, as well as the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are completely omitted from the assessment, which represents a significant lapse. Without the consideration of these factors, one cannot adequately grasp the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity with traits characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement questions the validity of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Another critical procedural failure is the omission of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to meet its legal duty to evaluate the social, cultural, and economic impacts on the island community. This alone hinders lawful determination.

From a policy standpoint, these inadequacies place the proposal in clear conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The oversight of both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a significant departure from policy requirements.

In summary, the failure to consider living heritage, intangible cultural values, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been properly assessed, and the application does not furnish a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that involved focus groups with local residents; however, the complete report has not been published. This significant evidential gap limits both public understanding and the competent

authority's ability to evaluate the social risks identified in the developer's research. The absence of the full assessment not only inhibits proper scrutiny of the findings but also restricts the determination of the significance of these impacts within the decision-making process.

Summaries of the assessment suggest that residents are currently experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts are based on direct engagement and are therefore not speculative. Additionally, there is evidence indicating that the proposal poses a direct threat to community identity and cohesion, with findings from the developer indicating a risk of "cultural loss." Yet, these impacts have not been adequately integrated into the main application nor given appropriate consideration.

The withholding of the full Social Impact Assessment obscures the true human and social costs of the proposed development, undermining the Environmental Impact Assessment process. It is crucial to have a complete understanding of the social, economic, and health impacts for developments of this scale, especially where community character may be affected. By failing to provide the complete dataset, the application does not present a thorough evidential basis to assess the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and avoid harm, yet the available evidence points to existing adverse effects that have not been fully revealed. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural implications of this situation are significant. The competent authority cannot conduct a rigorous socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission in the application and indicates a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, in conjunction with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation hampers a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

There are serious methodological issues regarding the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of the visual impact has been understated, undermining the reliability of the overall assessment.

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

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is not compatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment seriously undermines any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises serious concerns due to its incomplete assessment of construction and pollution risks, which lack the necessary detail to evaluate potential environmental

effects. It involves significant seabed preparation and installation works within a dynamic Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be established after consent, which hampers any meaningful evaluation of their effectiveness or adequacy.

This uncertainty is particularly alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats, both of which are susceptible to sediment disturbance and contamination. Although the application acknowledges the risks associated with sediment mobilization and the possibility of accidental chemical or oil spills, it lacks sufficient detail on prevention, control, or monitoring strategies.

Moreover, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from the seabed disturbance and cable installation. Without comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological implications of these impacts. This uncertainty also extends to the potential effects on already identified sensitive marine species and habitats within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards are in place to address pollution events. This situation introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of vital environmental safeguards is at odds with the stipulations of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are evaluated prior to granting consent. When critical information is absent, a lawful determination cannot be achieved. Furthermore, the application fails to prove compliance with policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, a lack of detailed management plans, and the uncertainty surrounding potential impacts renders the assessment significantly deficient. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application proposes development activities that could significantly disrupt the marine ecosystem and the fishing industry off the West Lewis coast, yet it lacks a robust assessment of the ecological and socio-economic impacts. The region is home to a diverse marine ecosystem and an active fishing community, but the proposal fails to demonstrate how these critical uses and habitats will be protected or maintained.

A major concern is the assumption that displacing fishing activity can occur without adverse effects. The application does not provide evidence that there are alternative fishing grounds that are available, accessible, or capable of handling any additional pressure. This gap in evidence is critical, as it presents the risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a clear and evidence-based assessment, understanding the potential impacts on fisheries and livelihoods remains incomplete.

The proposal also poses significant risks to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling over an extended duration is expected to cause disturbances over considerable distances, impacting species such as dolphins. The anticipated disturbance to a significant proportion of the local bottlenose dolphin population raises serious concerns; however, the application diminishes the importance of these impacts without adequate supporting evidence.

Inconsistencies within the application are evident, particularly in acknowledging the need for licenses to permit harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment overlooks cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not 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 represents 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 thorough evaluation of the potential impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal significantly fails to address the assessment of dark skies and nocturnal wildlife, representing a notable omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are integral to 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" effect across the western horizon, fundamentally altering

the night-time environment.

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the importance of dark skies to the identity of the region and to emerging tourism sectors such as astro-tourism, this oversight presents a significant gap in the overall landscape and environmental assessment.

Additionally, the absence of an evaluation of impacts on nocturnal wildlife raises further concerns. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and increased collision risks. The lack of a lighting impact assessment or a phototaxis study fails to examine how aviation lighting may impact these species and increase mortality rates.

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

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

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

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

TOURISM

The evaluation of tourism impacts is severely lacking and does not adequately address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The viability of tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contributions from tourism.

Significantly, tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not simulate how the potential industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or broader economic resilience. Without this analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise a flourishing sector.

Additionally, the assessment neglects the critical role environmental quality plays in enhancing tourism, including the significance of unspoilt landscapes and dark skies for visitor experiences and the burgeoning markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the oversight in assessing tourism impacts presents broader risks for employment, local enterprises, and the sustainability of the community. The absence of a thorough 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 fails to prove its compliance with National Planning Framework 4, especially regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and does not furnish sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

In summary, the collective failure to quantify tourism impacts, analyse environmental influences on visitor behaviour, and account for the island's economic dependencies leads to a significant evidential void. This gap hinders a thorough assessment of the economic effects and underscores the conclusion that the application is inadequate.

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.

Additional Comments

This proposed site must be halted or rethought. The impact of placing these huge structures to the Outer Hebrides will have a negative ever lasting impact that cannot be allowed.

This proposed site will not directly benefit the local community but will have a negative impact on their everyday life. Noise and visual pollution, the impact of construction and

external companies not local to the Hebrides not having any connection to the local area.

Any decision must be made with all voices across Scotland heard, not just the Outer Hebrides.

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: 556E56E4

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies in planning, environmental impact, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly pristine environment, and a strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, particularly in relation to statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for a lawful decision. There is missing critical environmental data, and the baseline information presented is limited and inconsistent, leaving key aspects of the proposal undefined. The flexible design framework employed creates uncertainty regarding potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

Furthermore, there are substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These policy discrepancies directly relate to the statutory tests required for consent and jeopardise the ability of the competent authority to determine that the development adheres to acceptable policy standards.

The unprecedented scale of the proposal raises substantial concerns regarding landscape capacity, visual dominance, and overall environmental impact, with large turbines positioned alarmingly close to the shoreline. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In such circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate. It does not offer a clear or trustworthy account of the likely environmental effects of the proposed development. The use of a flexible Project Design Envelope, which lacks commitment to specific turbine sizes and layouts, creates considerable uncertainty. This uncertainty hinders a consistent worst-case scenario application and undermines the assessment's integrity. As a result, the potential impacts presented may not accurately reflect the final development, limiting both public understanding and that of the competent authority regarding the true extent of environmental effects.

The application depends significantly on mitigation measures and management plans that remain undefined. Seeking consent based on the promise to address environmental harm later prevents a thorough evaluation of these measures' effectiveness and the assessment of any residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's aim, which is to establish significant effects and mitigation clearly before any determination is made.

There are serious evidential shortcomings, including insufficient baseline data and methodological limitations. The reliance on assumptions instead of site-specific evidence creates uncertainty about the scale and significance of impacts. Conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of comprehensive information obscures understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle must be invoked, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to show that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies impede a lawful and thorough evaluation of environmental effects, meaning that the competent authority cannot properly determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposal fails to meet the statutory requirements of the Environmental Impact Assessment regime, as the assessment of alternatives is materially inadequate. Instead of offering a structured comparison of realistic alternatives based on their environmental effects, the application merely presents a narrative account of how the project has evolved. This methodology does not sufficiently demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

There is a clear 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 placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The West Lewis coastline is sensitive, and proximity to the shore is critical in assessing impact; without this analysis, one cannot conclude that the proposed siting is the least damaging available option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear strategy to avoid these impacts and the absence of comparative analysis suggest that mitigation by design has not been considered, relying instead on post-design measures for mitigation.

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

From a policy standpoint, this deficiency jeopardises compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is significant and contributes to the overall conclusion that the application has not undergone adequate assessment, rendering it incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly flawed, failing to offer a comprehensive understanding of the ecological receptors within the West Lewis coastal environment. This area is a biologically active and highly sensitive marine system. However, the data collected is incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A crucial oversight pertains to otters, classified as a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns means that the impacts of construction disturbance, noise, and increased activity remain unassessed. This oversight undermines any conclusions drawn regarding significant effects on this species.

Additionally, there are significant deficiencies in the evaluation of basking sharks, as the reliance on aerial surveys introduces a substantial detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that highlight frequent use of these waters. The neglect to incorporate or properly consider such evidence leads to an incomplete baseline, further weakening the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of adequate baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as it has not properly identified or assessed protected species. The degree of uncertainty introduced makes it impossible to exclude 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 unsubstantiated conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, further reinforcing the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development presents significant concerns related to its impact on seabird populations, particularly given its location within key foraging areas and migratory pathways on the west coast of the Isle of Lewis. This region is known to support internationally important seabird populations, many of which are already in decline. The ornithological assessment accompanying the application is fundamentally flawed, containing notable gaps in evidence and internal inconsistencies that undermine its conclusions. Notably, it fails to demonstrate, to the required evidential standard, that these species will not be adversely affected by the development.

The application exhibits a fundamental contradiction; the developer asserts there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This raises serious concerns regarding the reliability of the assessment, as the conclusions drawn do not align with the underlying evidence. Furthermore, the assessment lacks sufficient evidence regarding the potential impacts on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not adequately recognised, and the modelling

approaches employed introduce uncertainty, particularly for species that are already in severe decline, such as Kittiwakes and Fulmars.

The siting of turbines within a recognised migratory corridor significantly heightens the risk of creating a barrier for species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. From a regulatory standpoint, the application falls short of meeting 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 gaps in data and limitations of the modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion in favour of consent.

Moreover, the deficiencies identified in the assessment 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. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts, leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally inadequate, particularly in its treatment of the West Lewis coastline, which should be regarded as a living cultural landscape where environment, language, tradition, and community are interconnected. The application adopts a reductive approach, treating heritage merely as isolated, static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

Notably, the assessment fails to properly address culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These active burial and spiritual practice locations are mischaracterised as static features, overlooking their continued use and meaning, as well as the potential impacts of development on their settings. This misrepresentation leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment lacks consideration of intangible cultural heritage, including the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These elements are integral to the area's identity but are completely omitted from the assessment, representing a significant deficiency. The failure to account for these factors prevents a proper understanding of the cultural impacts of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and contravenes established principles of participation in matters affecting cultural and environmental interests.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under 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 alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies 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, illustrates a clear departure from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a sufficient basis for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal currently under consideration has a materially deficient assessment of social impacts, health, and wellbeing, lacking the transparency required for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, yet the full report remains unpublished. This creates a significant evidential gap that impedes both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's own research.

Available summaries reveal that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the development. These impacts are based on direct engagement and are not speculative. However, the failure to disclose the complete assessment restricts proper scrutiny of these findings, thereby limiting the capacity to assess their significance in the decision-making process.

There is also notable 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. Despite this, such impacts have not been adequately integrated into the main application nor given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning may be compromised. The application fails to provide a complete evidential basis for evaluating the balance between benefits and harms due to the absence of the full dataset.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to support positive health outcomes and avoid harm, yet the evidence at hand points to existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy cannot be verified.

The procedural implications are significant, as the competent authority is unable to conduct a rigorous socio-economic and health evaluation without the complete Social Impact Assessment. This constitutes a material omission within the application and a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information for support.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly lacking, failing to capture the extent of change or the sensitivity of the environment involved. The character of the West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, contributes to a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would impose a continuous and dominant industrial presence, thus fundamentally transforming this character and resulting in an irreversible alteration of the landscape.

The application does not sufficiently convey the magnitude of the anticipated visual change. The size and proximity of the turbines are such that they would dominate the views from residential areas, historic sites, and popular coastal locations. This would negatively impact visual amenity and degrade the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the significance of this impact within the context of a sensitive landscape.

There are methodological issues concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly with respect to vital cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of visual impact has been understated, thus compromising the reliability of

the assessment.

Another major shortcoming is the failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape framework, linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites in isolation, neglecting their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the preservation of natural places and historic assets. The proposed scale of change is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertions of policy compliance.

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 prominent and unavoidable. Consequently, the resulting change is fundamental and permanent, incapable of being reduced to an acceptable level through any mitigation efforts.

In summary, the assessment does not accurately depict the scale of impact, the sensitivity of the environment, nor the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and firmly establish the conclusion that the proposal is incompatible with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks presented in this application is fundamentally incomplete, lacking the necessary detail to properly evaluate the potential environmental effects. Given the proposed substantial seabed preparation and installation works within a high-energy Atlantic environment, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on vague mitigation and contingency measures that are to be formulated post-consent, which severely hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming when considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and

contamination. While the application does acknowledge risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application prevents a thorough evaluation of whether appropriate safeguards are established to address pollution events. This creates procedural risks and undermines the capability of the competent authority to effectively assess environmental protection measures at the time of determination.

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

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These significant shortcomings obstruct a comprehensive evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not fully consider the impacts associated with what constitutes a single integrated project. The offshore turbines are intrinsically linked to the onshore works, yet these elements are assessed separately, leading to a fragmented approach that obscures the comprehensive scale of environmental and socio-economic effects.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is a vital carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application obstructs the evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are examined in tandem; however, the separation of offshore and onshore elements leads to a lack of clarity regarding the combined effects on peatlands, habitats, and local communities.

There are significant risks posed to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application fails to demonstrate that the impacts on these habitats have been adequately assessed or that appropriate avoidance measures have been implemented. This results in a clear evidential gap concerning biodiversity protection.

Moreover, the routing of infrastructure through active croft land introduces the potential for conflicts with existing land use and legal rights. The application does not provide evidence that the requisite consents or processes have been initiated, thereby raising concerns about deliverability and lawful implementation.

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

In summary, the fragmentation of project components, the absence of a comprehensive assessment, and the lack of 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 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 assessment of tourism impacts associated with the application is fundamentally flawed and does not adequately evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. With tourism having expanded notably from £65 million in 2017 to over £81.5 million, it currently supports more than 1,000 jobs and accounts for as much as 16% of the island's economy. However, the application does not adequately model how the industrialisation of the seascape and the potential degradation of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the community.

Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application acknowledges that 86% of visitors are attracted by scenery but fails to provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or overall economic contribution. Additionally, the assessment neglects to address the critical role of environmental quality in enhancing the tourism experience, particularly regarding unspoiled landscapes and dark skies, which are increasingly important for emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, resulting in a significant gap in understanding the impacts on a recognised and growing segment of the local economy.

Given that the island community has limited economic diversification, the failure to assess impacts on tourism carries broader implications for local employment,

businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as required under the Islands (Scotland) Act 2018. Furthermore, from a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the need to show net benefit. It also contradicts strategic objectives identifying tourism as a priority growth sector and lacks sufficient evidence for the competent authority to adequately assess the economic consequences of the proposal.

In summary, the combined failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and acknowledge the island's economic reliance on tourism creates a considerable evidential gap. This deficiency hinders a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application mirrors the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was established. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in numerous critical areas.

There are significant gaps in the baseline data provided, reliance on an undefined design envelope, and a lack of specified mitigation measures. Additionally, key impact pathways have been omitted, including those concerning nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to enable a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The absence of a compliant Island Communities Impact Assessment breaches statutory duties established under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment is a material omission. These deficiencies inhibit the competent authority from accurately assessing impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal also contradicts National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural places, or cultural heritage. It fails to present acceptable health and wellbeing impacts and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Moreover, the cumulative impact of both offshore and onshore elements has not been thoroughly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

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

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

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

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: 15263BC3

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and associated documentation reveals several material deficiencies concerning planning, environmental impacts, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. Concerns arise from the proposal's scale, proximity, and design, which fundamentally question its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and key elements of the proposal remain undefined. Furthermore, the flexible design framework employed hinders a clear understanding of potential significant effects, and reliance on unspecified mitigation measures means that their effectiveness cannot be properly evaluated. Consequently, the documentation fails to facilitate a full or informed understanding of environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust supporting evidence.

Substantive policy conflicts are evident throughout 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 demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and weaken the ability of the competent authority to determine the proposal's acceptability in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report 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 a structured and reasoned comparison of realistic alternatives, which is a critical requirement under the Environmental Impact Assessment regime. Instead of thoroughly assessing potential options based on their environmental effects, it presents a narrative that outlines the project's evolution. This

lack of rigorous analysis means that less harmful alternatives have not been properly identified or selected over more damaging options.

Furthermore, there is an absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has adequately considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be less severe. Given the delicate nature of the West Lewis coastline, and the importance of proximity to the shore in determining impacts, this oversight undermines the validity of the proposed siting as the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is insufficient evidence of exploration of alternative routes that could avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been effectively implemented, with an overreliance on post-design mitigation measures.

As a result, the application does not demonstrate that environmental harm has been adequately minimised through site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy, obstructing the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. Without a thorough assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with relevant policy.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly with respect to the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate evaluation and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to deliver a complete and dependable understanding of the ecological receptors present in the West Lewis coastal environment. This marine system is sensitive and biologically active, yet the existing baseline data is insufficient, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, the evaluation does not provide a solid evidential basis for understanding potential impacts.

One significant oversight is the treatment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active usage of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns means the potential effects of construction disturbance, noise, and increased activity have not been thoroughly assessed. This lack

of assessment undermines any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks also displays notable deficiencies, as the reliance on aerial surveys introduces a significant 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 indicate frequent usage of these waters. The failure to include or appropriately consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that the conclusions of negligible or non-significant effects are based more on assumptions than on rigorous evidence. The lack of adequate baseline data prevents a meaningful evaluation 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 their habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it 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, invoking the precautionary principle. In light of 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 inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species and contribute to the overall finding that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the development fails to convincingly demonstrate that these species will not be adversely affected, despite the crucial location within key foraging areas and migratory pathways. It does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss, resulting in significant gaps in evidence and internal inconsistencies that undermine its conclusions.

A critical contradiction exists within the application, as the developer concludes that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case. This case is only necessary when significant harm is expected, which raises doubts about the reliability of the assessment and indicates that the conclusions reached are not substantiated by the evidence provided. Furthermore, the assessment

lacks sufficient evidence to assure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not thoroughly considered, and the reliance on modelling introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and the behavioural responses of the birds are not fully understood.

The siting of turbines within a recognised migratory corridor poses an additional and significant risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor are not adequately assessed, nor are the potential effects on species with small global populations considered.

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, combined with data gaps and limitations in the modelling approach, means that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle and prevents a lawful conclusion in support of consent.

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

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings inhibit a thorough 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 cultural heritage and community identity assessment is fundamentally insufficient, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community interweave. The application adopts a narrow perspective, viewing heritage as a collection of isolated, static assets, failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These active sites of burial and spiritual practice are mischaracterised as static features, with the assessment neglecting their continued use and meaning, as well as the impact that development could have on their setting. This inadequate representation leads to an incomplete understanding of cultural effects and disregards their role in community life.

Additionally, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language and traditions, as well as the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are completely omitted from the assessment, which represents a significant lapse. Without the consideration of these factors, one cannot adequately grasp the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity with traits characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement questions the validity of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Another critical procedural failure is the omission of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to meet its legal duty to evaluate the social, cultural, and economic impacts on the island community. This alone hinders lawful determination.

From a policy standpoint, these inadequacies place the proposal in clear conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The oversight of both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a significant departure from policy requirements.

In summary, the failure to consider living heritage, intangible cultural values, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been properly assessed, and the application does not furnish a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The 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 evaluation of landscape, seascape, and visual impacts presented in the application is significantly inadequate, failing to capture the true scale of change and the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by its open Atlantic horizon and an undeveloped quality, which together contribute to a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a pervasive industrial presence that would irreversibly transform this landscape, fundamentally altering its character.

Furthermore, the application does not sufficiently address the extent of visual change resulting from the turbines' scale and proximity. Their imposing nature would dominate the views from residential areas, historic sites, and popular coastal locations,

detrimentally affecting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment inadequately captures the significance of this impact within the context of such a sensitive landscape.

Concerns also arise from the methodology employed in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding significant cultural heritage sites and valued landscapes. This leads to a potential underestimation of visual impacts, which in turn questions the reliability of the overall assessment.

Additionally, there is a critical oversight in evaluating the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integrated into a broader landscape context, interlinked visually and spatially with the Atlantic horizon. The assessment incorrectly treats these heritage assets as isolated, neglecting their interdependence and leading to an incomplete understanding of the impacts on their settings and cultural importance.

The proposed industrialisation of the seascape would sever these crucial connections, altering how heritage assets are perceived and disrupting their ties to the natural horizon. This signifies not only a visual disturbance but also a deeper cultural and spatial detriment that has not been sufficiently addressed in the application.

From a policy standpoint, this proposal directly contravenes the National Planning Framework 4 concerning the preservation of natural spaces and historical assets. The magnitude of change associated with the proposal is incompatible with the obligation to protect landscape character, visual amenity, and the settings of sites of cultural significance. The lack of a thorough worst-case scenario analysis further compromises any assertion of compliance with policy.

It is evident that the impacts identified in the assessment cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. The resulting alterations are fundamental and permanent, rather than manageable to an acceptable extent through mitigation strategies.

In conclusion, the assessment falls short of accurately portraying the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strongly indicate that the proposal is at odds with the essential protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to assess construction and pollution risks adequately. There is no comprehensive information on Construction Environmental Management Plans or Pollution Prevention Plans, despite significant seabed preparation and installation occurring in a challenging Atlantic environment. Instead,

the application proposes that mitigation and contingency measures will be developed after consent is granted. This approach raises concerns about the effectiveness and sufficiency of these measures.

The West Lewis coastline, known for its clean waters and important habitats, is sensitive to disturbances from sediment and contamination. Although the application acknowledges potential risks like sediment mobilisation and spills, it fails to outline clear strategies for prevention, control, or monitoring of these issues.

There is a notable lack of clarity regarding the scale and behaviour of sediment plumes that may result from the disturbance and cable installation. Without adequate modelling and established management plans, it is impossible to assess the duration, extent, or ecological ramifications of these potential impacts. This uncertainty also extends to sensitive marine species and habitats already identified in the broader assessment.

Additionally, the absence of detailed emergency response procedures exacerbates the issue. By postponing contingency planning until after consent, the application obstructs the evaluation of whether sufficient safeguards are in place to handle pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess environmental protections during the decision-making process.

From a regulatory standpoint, the delay in implementing essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. Significant effects and necessary mitigation should be evaluated before consent, and without this information, a lawful determination cannot be reached. The application also does not comply with established policies related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts render the assessment deficient. These failures impede a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with the application is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast not only support a diverse marine ecosystem but also house an active fishing industry. However, the application does not adequately demonstrate that these habitats and uses can be maintained without considerable disruption.

A significant concern is the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds are accessible, available, or able to bear additional pressure. This oversight is critical, as

displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a well-supported assessment, the impacts on fisheries and the livelihoods of those dependent on them remain unclear.

The proposal also poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. The use of high-energy hammer piling for extended periods is likely to cause disturbances over large areas, potentially affecting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns. Nevertheless, the application minimizes the significance of these effects, lacking adequate supporting evidence.

There is an evident contradiction in the application concerning the necessity for licences to authorise harm to European Protected Species, while concurrently describing such impacts as negligible. This inconsistency undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly where harm is expected to a level that requires legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The current application regarding the project presents a significantly incomplete assessment of the onshore infrastructure, failing to fully address the impacts associated with what should be considered as a single integrated project. The offshore turbines and the corresponding onshore works are inherently interconnected; however, their separate evaluations lead to a disjointed analysis that obscures the actual extent of environmental and socio-economic consequences.

Among the onshore components, the proposed installation of cabling through protected moorland, the construction of a substation in proximity to Stornoway, and

the establishment of access routes through delicate landscapes are notable. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is an ecologically sensitive habitat and a crucial carbon store. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

Moreover, the omission or delay in assessing onshore impacts obstructs a comprehensive evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project must be examined collectively; yet, the delineation between offshore and onshore components results in an inadequate understanding of the combined effects on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, such as machair systems and peatland environments, which have policy protection in place. The application does not provide sufficient evidence that these habitats' impacts have been thoroughly evaluated or that suitable avoidance strategies have been implemented, leading to an evident gap in biodiversity protection.

Furthermore, the routing of the proposed infrastructure through active croft land poses possible conflicts with existing land use and legal rights. The application does not demonstrate that the requisite consents or processes have been commenced, casting doubt on the project's feasibility and lawful execution.

From a policy standpoint, the disjunction in assessing the project holistically and demonstrating the safeguarding of peatlands, habitats, and land use interests stands in contradiction to both the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be effectively avoided or mitigated further weakens the application.

In conclusion, the separation of project components, the lack of a comprehensive assessment, and the absence of substantial evidence concerning environmental and land use impacts culminate in an incomplete and unreliable submission, thus 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 proposed development brings serious concerns regarding its impacts on tourism, a vital component of the Isle of Lewis economy. With tourism being fundamentally reliant on the area's wild coastline, near-pristine landscape, dark skies, and the overall sense of remoteness, any industrialisation of the seascape may jeopardise this crucial sector. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide any quantified analysis regarding how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the economic contribution of tourism.

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

Furthermore, the assessment neglects the critical role of environmental quality in sustaining tourism, such as the need for unspoiled landscapes and dark skies, which enhance the visitor experience and cater to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further

exacerbates this issue, leaving a substantial void in understanding how the proposal could affect this recognised and growing segment of the local economy.

In a context where economic diversification is limited for this island community, the lack of a thorough assessment of tourism impacts raises significant concerns regarding employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, contrary to the requirements of the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the obligation to prove net benefit. Additionally, it contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to evaluate the economic implications of the proposal.

Collectively, the inadequacies in quantifying tourism impacts, assessing environmental factors influencing visitor behaviour, and recognising the island's economic dependencies result in a significant evidential gap. This deficiency obstructs a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

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

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

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

In addition, the proposal conflicts with National Planning Framework 4. It does not

adequately demonstrate the protection of biodiversity, natural landscapes, and cultural heritage. The application fails to confirm that health and wellbeing impacts are acceptable and lacks tourism impact modelling, preventing it from evidencing a net economic benefit. The assessment of cumulative impacts from both offshore and onshore elements has not been conducted properly, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

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: 038185FF

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, highlighting material deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The wind farm is proposed to be located off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the proposal centre on its scale, proximity to the shore, and design, raising questions about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, while baseline information is limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The flexible design framework does not allow for a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by strong evidence.

There are significant policy conflicts within the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to ascertain whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal presents additional concerns, with large turbines positioned very close to the shoreline, raising issues of landscape capacity, visual dominance, and environmental impact. Overall, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle should be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

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

There is a significant oversight concerning otters, which are a European Protected Species. The application does not appropriately recognise or evaluate their active use of coastal areas for foraging and movement. This neglect of their core foraging range and behavioural patterns means the assessment does not adequately consider the potential effects of construction activities, noise, and increased human presence. As a result, the conclusions regarding the absence of significant impacts on this species are undermined.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The development is situated within critical foraging areas and migratory routes on the west coast of the Isle of Lewis, which is known to host internationally significant

seabird populations. These populations are already facing declines, and the application does not adequately prove that these species will not suffer adverse effects. The ornithological assessment presented contains significant gaps and internal inconsistencies, undermining its conclusions. It fails to thoroughly evaluate the potential risks associated with displacement, collision, and habitat loss for these birds.

A key contradiction arises from the developer's assertion that there will be no significant adverse effects while simultaneously advancing a case for Habitats Regulations derogation, which is necessitated only when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that the conclusions are not substantiated by the available evidence. There is insufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be impacted. The assessment inadequately considers the importance of these feeding grounds, and the reliance on modelling approaches introduces additional uncertainty, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses remain insufficiently understood.

The placement of turbines within a recognised migratory corridor poses a further significant risk, effectively establishing a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of potential sustained mortality in this corridor or the effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the necessary evidential standard to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, combined with gaps in data and limitations in modelling, indicates that the threshold of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and precludes a lawful conclusion that would support consent. Additionally, 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 remain unaffected places the proposal in direct conflict with national policy.

Overall, the assessment is rendered unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These deficiencies impede a thorough evaluation of the potential impacts and lead to the 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 evaluation of social impacts, health, and wellbeing in relation to the proposal is significantly inadequate and lacks the necessary transparency for a lawful assessment. The developer engaged in a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This

represents a critical evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks identified through the developer's own investigations.

Residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development, as indicated by available summaries. These impacts stem from direct engagement and thus are based on factual evidence rather than speculation. Nonetheless, the failure to release the full assessment limits scrutiny of the findings and restricts the capacity to evaluate their significance in the decision-making process.

Furthermore, there is a perception that the proposal threatens community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite these serious implications, they have not been adequately considered in the main application or given the necessary weight. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency has broader implications for the Environmental Impact Assessment process. A thorough understanding of social, economic, and health effects is crucial for developments of this magnitude, especially where community character and functioning may be disrupted. The absence of the complete dataset means that the application does not provide a comprehensive evidential basis for weighing the benefits against the harms involved.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm, yet the evidence presented indicates existing adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be validated.

The procedural consequences are substantial. 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 oversight in the application and a failure to fulfill the evidential standards mandated by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts associated with the proposed turbines is fundamentally inadequate, failing to recognise the profound scale of change and the sensitivity of the local environment. The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, which are threatened by

the introduction of large-scale turbines situated near the shoreline. Such an industrial presence would significantly alter the character of the area, leading to a permanent transformation of the landscape.

Furthermore, the application lacks a thorough representation of the extent of visual change. Given their size and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, directly compromising visual amenity and undermining the essential qualities of naturalness and remoteness. This critical impact is not sufficiently conveyed within the assessment, which diminishes the significance of these changes in a sensitive landscape context.

Concerns regarding the methodology used to select and present visual viewpoints also arise, as evidence indicates that certain viewpoints may fail to capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been minimised, thus calling into question the reliability of the assessment.

Moreover, the assessment neglects the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, which obscures their interdependence and leads to an incomplete evaluation of impacts on their setting and cultural value.

The industrialisation of the seascape would sever the critical connections that enable the appreciation of these heritage sites, altering the context in which they are experienced and disrupting their relationship with the natural horizon. This signifies not only a visual impact but also a deeper cultural and spatial detriment that has not been comprehensively evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The magnitude of change proposed is at odds 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 calls into question any assertion of policy compliance.

Lastly, it is evident that the impacts outlined in the proposal cannot be effectively mitigated. Due to the dimensions, height, and closeness of the turbines, their presence would be overpowering and unavoidable, resulting in a fundamental and lasting change that cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment inadequately portrays the scale of impact, overlooks the sensitivity of the environment, and fails to recognise the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the assertion that the proposal is incompatible with the protection of this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The current application presents serious deficiencies in its assessment of construction and pollution risks, failing to provide the necessary detail for a comprehensive evaluation of environmental effects. Significant seabed preparation and installation work is proposed in a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated post-consent, thus hindering any meaningful assessment of their potential adequacy or effectiveness.

The reliance on unspecified future measures is particularly alarming in light of the delicate receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are sensitive to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to offer sufficient details on how these risks will be prevented, controlled, or monitored.

Moreover, there remains uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been recognised as sensitive within the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are established to address pollution events. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures before making a determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is mandatory that likely significant effects and mitigation strategies are assessed prior to consent; without this information, a lawful determination cannot be made. The application also does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, 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 impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application lacks a thorough assessment of the ecological and socio-economic impacts. It fails to provide evidence that the diverse habitats and activities in the area can be preserved without significant disruption.

One major concern is the assertion that fishing activities can be relocated without any consequences. The application does not demonstrate that there are alternative fishing grounds available, accessible, or capable of withstanding added pressure. This oversight is critical, as the potential for overfishing in other areas could have adverse economic effects on the local fishing fleet. Without a solid, evidence-based evaluation, the implications for fisheries and livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise created during construction. The use of high-energy hammer piling for extended periods will likely disturb marine life over vast areas, notably affecting species like dolphins. The anticipated disruption to a considerable portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays the significance of these effects, lacking sufficient evidence to support this minimisation.

There is also a glaring inconsistency in the application regarding the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction questions the reliability of the assessment and highlights concerns about compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

Moreover, the assessment does not adequately consider the cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4 and the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable repercussions on marine biodiversity, making it impossible to conclude that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is significantly deficient, failing to capture the complete range of impacts from what constitutes a single integrated

project. The offshore turbines and the associated onshore works are closely interconnected; however, they have been evaluated in isolation. This fragmented assessment obscures the true extent of environmental and socio-economic consequences.

Central to the onshore elements are the proposed cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly in Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. Without a thorough evaluation of these effects, the project's overall environmental impact remains unclear.

Furthermore, by omitting or postponing the assessment of onshore impacts, the application undermines the ability to effectively evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; yet, the division between offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities are inadequately understood.

Significant risks to sensitive habitats, such as machair systems and peatland environments, are present and these areas are subject to policy protection. The application fails to show that these impacts have been fully evaluated or that suitable avoidance measures have been put in place, creating a noticeable evidential gap regarding biodiversity protection.

Concerns also arise surrounding carbon balance, as the disruption of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains positive.

Moreover, routing the infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, raising doubts about its feasibility and legal compliance.

From a policy standpoint, the failure to assess the project as a cohesive whole and to adequately protect peatlands, habitats, and land use interests is inconsistent with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to include any assessment of dark skies and nocturnal wildlife, which constitutes a material omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, an important aspect of environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting will be visible over long distances, creating a continuous and intrusive “wall of light” across the western horizon, thereby fundamentally altering the night-time environment.

The application neglects to evaluate how this lighting will affect visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is significant considering the value of dark skies to the area’s identity, particularly as emerging sectors like astro-tourism gain importance. The absence of such assessments represents a clear gap in the overall landscape and environmental evaluation.

Moreover, there is no examination of potential impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The lack of a lighting impact assessment or phototaxis study prevents an understanding of how aviation lighting might affect these species or lead to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and associated risks. Kittiwakes, for instance, may forage or migrate at night and are vulnerable to disorientation from artificial lighting; yet, this risk has not been addressed. The absence of site-specific night-time data results in a critical shortfall in understanding the ecological impacts involved.

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

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

In conclusion, 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 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 is fundamentally flawed in its adherence to the principles of sustainable development as measured against statutory requirements, national policy, and evidential standards. It echoes the critical issues associated with the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. This current application, despite being presented under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to provide a complete and reliable evidential basis for decision-making.

There are notable deficiencies in the baseline data provided, including the use of an

undefined design envelope and the reliance on unspecified mitigation measures. Key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have been overlooked, rendering the Environmental Impact Assessment incomplete. This lack of thorough analysis inhibits a comprehensive understanding of the likely significant effects and residual impacts.

In addition to the evidential gaps, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the 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 unfit for determination.

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

Environmental risks associated with the proposal remain ambiguous and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion that impacts can be considered acceptable.

Moreover, the proposal would cause 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 connections, and detrimental effects on tourism represent enduring impacts that cannot be adequately mitigated.

In conclusion, 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. Therefore, it is essential that the competent authority either refuses consent based on these grounds or utilises the relevant regulatory provisions to mandate the submission of the missing information. A formal request is thus made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

We holiday to Isle of Lewis for its peacefulness, scenery, marine and wildlife in their natural habitat and for local culture. It is a beautiful part of the world!

I feel the windfarm would have a huge detrimental impact on the islands views and wildlife which in turn would impact on tourism which is heavily relied upon.

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: 99F7D5E5

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 Environmental Impact Assessment Report is fundamentally lacking, failing to deliver a comprehensive, clear, or dependable overview of the anticipated environmental repercussions of the proposal. The reliance on a flexible Project Design

Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, creates a considerable degree of uncertainty. This uncertainty undermines the reliability of the assessment, meaning that the potential impacts may not accurately reflect the development that will ultimately be built. Consequently, both the public and the competent authority are left without a proper understanding of the true scope of environmental effects.

Moreover, the application places significant emphasis on mitigation measures, monitoring strategies, and management plans that have yet to be established. By seeking consent on the premise that environmental damage will be mitigated later, there is a lack of opportunity for meaningful evaluation of these measures or assessment of any residual impacts. This postponement of crucial information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation must be clearly defined before determination.

The report also exhibits serious evidential shortcomings, with gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainties about the scale and significance of impacts, particularly when findings of negligible or non-significant effects are presented without solid supporting data. The insufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not satisfy the evidential criteria required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, since it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specific mitigation, and the deficiencies in baseline data culminate in an Environmental Impact Assessment Report that is neither reliable nor complete. These issues preclude a lawful and rigorous evaluation of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives, which is a critical requirement under the Environmental Impact Assessment regime. Instead of offering a structured comparison of realistic options based on their environmental effects, it provides a narrative account of the project's evolution. This lack of a systematic approach means that less harmful alternatives have not been properly identified or evaluated in favour of more damaging solutions.

There is a significant lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has genuinely considered placing the turbines further offshore, where the potential visual, ecological, and coastal impacts might be diminished. The sensitivity of the West Lewis coastline underscores the importance of proximity to shore in assessing impact, and the absence of a thorough analysis in this regard hinders the ability to ascertain whether the proposed siting is indeed the least damaging option.

Furthermore, the shortcomings extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been explored sufficiently to mitigate impacts on sensitive receptors. This includes significant sites of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that the project has not applied mitigation by design, relying instead on measures intended to be implemented post-design.

As a consequence, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This oversight fails to follow the established mitigation hierarchy and prevents the competent authority from determining whether more suitable and less harmful alternatives are available. Without a thorough assessment of alternatives, one cannot conclude that the proposal is sustainable or compliant with relevant policies.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally flawed, lacking a complete understanding of the ecological receptors within the West Lewis coastal environment. This region is a biologically active and sensitive marine system, yet the baseline data presented is inadequate. The methodologies employed fail to effectively capture the presence, behaviour, and habitat use of species, leading to an unreliable basis for evaluating impacts.

A significant oversight is the assessment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. This neglect of their core foraging range and behavioural patterns means that the potential impacts from construction disturbance, noise, and increased activity have not been thoroughly evaluated. Consequently, this undermines the conclusions regarding the lack of significant effects on this species.

Additional shortcomings are evident in the evaluation of basking sharks, where reliance on aerial surveys leads to considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially in light of established land-based observations that indicate frequent use of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

The methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of sufficient baseline data also hampers the assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty around 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 protected species. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, engaging the precautionary principle. In light of this, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the 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 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 proposal currently under consideration demonstrates significant deficiencies in the assessment of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents. However, the absence of the full report is a major evidential gap that hinders both public understanding and the authority's ability to grasp the extent of social risks identified by the developer's own research.

Residents have reported experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as shown through direct engagement. The lack of access to the complete assessment obstructs proper scrutiny of these findings, thus limiting the capacity to ascertain their importance in the decision-making process. Furthermore, the proposal is perceived as a threat to community identity and cohesion, with indications of "cultural loss" emerging from the developer's findings. Despite this, such impacts have not been adequately considered in the main application or given the necessary weight. The failure to release the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is critical for developments of this magnitude, particularly when community character and functionality may be at risk. By withholding the complete dataset, the application does not provide a comprehensive evidential basis necessary for weighing benefits against harm.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 concerning health and wellbeing. Developments are expected to promote positive health outcomes and prevent harm, yet the evidence available reveals existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to affirm compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to carry out a robust socio-economic and health evaluation due to the lack of access to the complete Social Impact Assessment. This represents a material omission within the application and fails to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The assessment provided fails to adequately reflect the magnitude of the visual change that would occur. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the qualities of naturalness and remoteness. This assessment does not convey the true level of impact, particularly in the context of such a sensitive landscape.

Methodologically, there are concerns regarding how visual viewpoints have been selected and presented. It appears that these viewpoints may not capture the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight introduces the risk of underestimating the magnitude of visual impact, thus calling into question the reliability of the assessment.

Another critical deficiency is the failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Important sites, including 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 considers these sites in isolation, neglecting their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This issue presents not just a visual impact but also a broader cultural and spatial harm that has not been adequately explored within the application.

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

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 fundamental and permanent, rather than something that could be lessened 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 prevent a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment concerning construction and pollution risks lacks the necessary detail to adequately evaluate the likely environmental effects of the proposal. The project involves extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

Particularly alarming is this reliance on undefined future measures, especially given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application does recognise risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide sufficient detail on the prevention, control, or monitoring of these risks.

Furthermore, there is uncertainty surrounding the scale and behaviour of sediment

plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, determining the extent, duration, or ecological effects of these impacts is impossible. This uncertainty also extends to the potential effects on marine species and habitats 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 respond to pollution incidents. This approach introduces procedural risk and compromises the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent; the absence of such information means a lawful determination cannot be made. Additionally, 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 materially deficient. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with the application lacks sufficient depth, failing to provide a robust evaluation of both ecological and socio-economic impacts. The area off the West Lewis coast is home to a diverse marine ecosystem and supports an active fishing industry. However, the proposal does not adequately demonstrate the protection and maintenance of these vital uses and habitats without significant disruption.

A critical concern is the assumption made within the application regarding the displacement of fishing activity, which is presented as a feasible option without acknowledging potential consequences. There is no evidence provided to support the availability, accessibility, or capacity of alternative fishing grounds to accommodate any increased pressure. This significant omission raises concerns about overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Consequently, without a clear and evidence-based assessment, the impacts on fisheries and the livelihoods they support remain poorly understood.

Furthermore, the proposal introduces considerable risks to marine species, especially from the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended period is likely to cause disturbances over large distances, potentially affecting species such as dolphins. The forecasted

disturbance to a substantial portion of the local bottlenose dolphin population is particularly alarming; yet, the application minimises the significance of these effects without adequate supporting evidence.

There is an evident inconsistency in the application, wherein the requirement for licences to permit harm to European Protected Species is acknowledged while simultaneously describing the impacts as negligible. This contradiction raises concerns about the credibility of the assessment and compliance with the Habitats Regulations, especially when harm is anticipated to an extent that requires legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project lacks completeness, particularly concerning onshore infrastructure, which is critical to understanding the overall impacts of the integrated project. The offshore turbines and onshore works are interrelated, yet the assessment treats them as separate entities. This fragmented approach obscures the comprehensive scale of environmental and socio-economic effects associated with the project.

The onshore components consist of cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. Notably, these activities entail excavation in areas of deep peat, especially within Barvas Moor, which serves as a significant carbon store and is an ecologically delicate habitat. The application falls short of delivering a thorough assessment of these impacts, which is essential for fully grasping the project's environmental footprint.

By omitting or delaying the evaluation of onshore impacts, the application hampers the assessment of cumulative effects. The Environmental Impact Assessment (EIA) process mandates that all elements of a project be considered collectively. The current

separation between offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protection. The proposal does not sufficiently demonstrate that impacts on these habitats have been fully assessed or that suitable avoidance measures have been implemented, leading to a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland releases stored carbon, potentially generating a carbon debt that contradicts renewable energy development goals. The application fails to sufficiently address this issue or prove that the overall carbon balance is favourable.

Additionally, routing infrastructure through active croft land raises potential conflicts with current land use and legal rights. There is no evidence provided that the requisite consents or processes have been initiated, which brings into question the deliverability and lawful execution of the project.

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

Overall, the separation of project components, the lack of a comprehensive assessment, and the absence of evidence concerning environmental and land use impacts render this aspect of the application incomplete and unreliable. This inadequacy impedes a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline boasts exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, visible from considerable distances, would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

The application neglects to evaluate the impacts of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is critical, given the significance of dark skies for the identity of the area and the emerging sector of astro-tourism. Such omissions create a distinct gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species like Manx

Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collision. The application does not provide any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or lead to increased mortality rates.

This oversight is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been investigated. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, this omission is inconsistent with National Planning Framework 4, which pertains to the protection of natural environments and the quality of the surroundings. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time is an integral aspect of the environment.

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

TOURISM

The Isle of Lewis tourism sector has seen significant growth, with its economic contribution 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 local economy. Despite this, the application fails to adequately assess the impacts of proposed large-scale offshore infrastructure on this vital sector. It acknowledges that 86% of visitors are drawn by the area's stunning scenery, yet it does not quantify how industrial developments could affect visitor numbers, behaviours, or the overall economic contributions made by tourism.

Furthermore, the assessment does not consider the crucial role of environmental quality in enhancing the visitor experience, such as the significance of unspoiled landscapes and dark skies. The neglect of a Dark Skies Assessment leaves a substantial gap in understanding the impacts on emerging markets like nature-based tourism and astro-tourism, both of which are important for local economic sustainability.

In an island community with limited economic diversification, the lack of assessment regarding the impacts on tourism raises concerns for local employment, businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that the economic vulnerabilities of the area have not been evaluated 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 necessary demonstration of net benefit. It contradicts strategic objectives that position tourism as a priority growth sector and lacks sufficient evidence for the competent authority to gauge the economic repercussions of the proposal.

Overall, the failure to quantify tourism impacts, assess environmental factors influencing visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This lack of analysis prevents a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as required by statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This current application, despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, has not adequately addressed those concerns.

A significant lack of reliable evidential basis exists for the application. Critical gaps in baseline data are evident, and the continued use of an undefined design envelope raises questions. Moreover, it relies on unspecified mitigation measures and omits key impact pathways such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism. This leads to an incomplete Environmental Impact Assessment, which does not facilitate a comprehensive understanding of the likely significant effects or residual impacts.

The application also exhibits clear procedural shortcomings. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment is a material omission. These issues impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks

evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly assessed, masking impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks remain. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some cases, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

In light of these issues, a formal request is made that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

This is incredibly dangerous and damaging to the fragile ecosystem and environment of such a special place

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 427D91C8

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

Dear Sir/Madam

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

The application lacks a sufficient evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key aspects of the proposal remain undefined. The flexible design framework inhibits a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to furnish a complete or informed understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts directly challenge the statutory tests needed for consent and hinder the competent authority's ability to determine the acceptability of the development from a policy perspective.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

These methodological shortcomings result in conclusions regarding negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of adequate baseline data also hinders meaningful assessments of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. As a result, there is substantial uncertainty regarding the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been correctly identified or evaluated. The uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application lacks a thorough assessment of seascape, landscape, and visual impacts, failing to reflect the true scale of change or the sensitivity of the environment.

The West Lewis coastline is characterised by its unspoiled Atlantic horizon and an overwhelming sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would create a persistent and dominating industrial presence, fundamentally transforming this unique character and resulting in permanent and irreversible changes to the landscape.

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

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

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

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

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

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

In summary, the assessment does not accurately capture the extent of the impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage.

These deficiencies impede a reliable evaluation and underscore the conclusion that the proposal is incompatible with the preservation of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

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

In summary, the fragmentation of project components, the absence of a comprehensive assessment, and the lack of proof concerning environmental and land use impacts render this part of the application inadequate and untrustworthy, ultimately obstructing a lawful determination.

TOURISM

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

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

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

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

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

In summary, the inability to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and recognise the island's economic dependency

leads to a substantial evidential gap. This prevents a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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: 6C0ED080

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and its accompanying documentation reveals significant deficiencies in planning, environmental considerations, cultural factors, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage. Concerns arise regarding the scale, proximity, and design of the project, questioning its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for lawful determination. Essential environmental data is absent, baseline information is inconsistent and limited, and critical elements of the proposal remain unspecified. The flexible design framework used prevents a comprehensive understanding of potential significant effects, and the reliance on yet-to-be-defined mitigation measures raises doubts about their effectiveness. Consequently, the documentation fails to provide a complete or informed perspective on environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects which are not backed by robust evidence.

There are evident and substantive conflicts with policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly relate to the statutory tests necessary for consent and compromise the capacity of the competent authority to affirm the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces substantial concerns, especially with large turbines positioned near the shoreline, impacting landscape capacity, visual dominance, and overall environmental consequences. Collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential shortcomings, and clear conflicts with policy indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents a number of serious deficiencies that collectively undermine its validity. The reliance on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This lack of clarity obstructs the ability to apply a worst-case scenario consistently, thereby compromising the integrity of the Environmental Impact Assessment Report. As a result, the environmental impacts outlined may not accurately reflect those of the final development, depriving both the public and the competent authority of a proper understanding of potential environmental effects.

Moreover, the application is overly dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the assumption that environmental harm will be managed later is inappropriate, as it precludes a meaningful evaluation of these measures' effectiveness or the assessment of any residual impacts. This deferral of critical information to post-consent stages contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be established prior to determination.

Significantly, there are notable evidential gaps, including a lack of comprehensive baseline data and methodological limitations, along with a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the magnitude and significance of impacts. The presentation of conclusions asserting negligible or non-significant effects without robust supporting data further obscures understanding. The lack of sufficient information hinders clarity on cumulative and worst-case impacts, introducing a level of scientific uncertainty that is inconsistent with statutory requirements.

As a result, the application does not meet the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to satisfy the requirements of National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity. The inability to demonstrate that impacts have been fully assessed or that appropriate safeguards exist is evident.

In conclusion, 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 unreliable and incomplete. These critical deficiencies prevent a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is significantly lacking and does not fulfil the statutory requirements outlined in the Environmental Impact Assessment regime. The application fails to provide a structured and reasoned comparison of viable alternatives

based on their environmental effects, instead offering a narrative account of the project's evolution. This method does not demonstrate that less harmful options have been thoroughly identified, assessed, and selected over more damaging solutions.

There is a notable absence of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, which would likely lessen 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 lack of such analysis prevents any conclusion that the proposed siting is indeed the least damaging option.

The shortcomings extend to the evaluation of cable routing and landfall, where there is inadequate evidence that alternative routes have been properly investigated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation through design has not been effectively employed, with an overreliance on post-design mitigation measures instead.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly flawed and does not yield a comprehensive or reliable understanding of the ecological receptors present. This region represents a highly sensitive and biologically vibrant marine ecosystem; however, the baseline data provided is insufficient, and the methodologies employed do not adequately capture essential aspects such as species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a sound evidential basis necessary for evaluating potential impacts.

One notable oversight pertains to otters, classified as a European Protected Species. The application fails to adequately identify and assess their active utilisation of coastal

areas for foraging and movement. The neglect of their core foraging range and behavioural patterns indicates that the potential impacts arising from construction disturbances, noise, and increased human activity have not been thoroughly evaluated. This inadequacy undermines the conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings arise in the evaluation of basking sharks. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This methodological approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions reached.

The limitations of these methodologies lead to the conclusion that claims of negligible or non-significant effects are based on assumptions rather than robust, evidence-based findings. The lack of adequate baseline data further obstructs meaningful assessments of cumulative and indirect impacts, encompassing seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as there has been insufficient identification and assessment of protected species. The level of uncertainty created precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, the lawful granting of consent is not permissible.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions compromises the reliability of the assessment. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, contributing to the overall determination that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment pertaining to the proposed development is fundamentally unreliable, featuring significant internal inconsistencies and gaps in evidence that severely undermine its conclusions. This development is situated in critical foraging areas and migratory pathways along the west coast of the Isle of Lewis, which is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will remain unaffected, failing to meet the evidential standard required for such assertions.

Moreover, there exists a stark contradiction within the application, wherein the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only warranted if significant

harm is anticipated. This inconsistency calls into question the trustworthiness of the assessment, highlighting that the conclusions drawn are not substantiated by the available evidence. The assessment fails to provide robust proof that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will not suffer negative impacts. The critical nature of these feeding grounds has not been thoroughly addressed, and the reliance on modelling approaches creates uncertainty, particularly for species that are facing severe declines, such as Kittiwakes and Fulmars. Furthermore, the methodologies employed are likely to underestimate potential mortality, especially in contexts where baseline data is lacking and the behavioural responses of species are inadequately understood.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively establishing a barrier in a primary flight path for species 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 effects on species with limited global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, in conjunction with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This activates the precautionary principle and obstructs a lawful conclusion supporting consent.

Additionally, the deficiencies observed illustrate non-compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to conclusively demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to internal contradictions, methodological shortcomings, and insufficient evidence. These failings hinder a thorough evaluation of impacts and collectively contribute to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented in this application is fundamentally inadequate, failing to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are deeply interconnected. The approach taken reduces heritage to isolated, static assets and neglects their ongoing social, cultural, and spiritual functions within the community.

A significant deficiency is evident in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are inaccurately categorised as static features. This mischaracterisation overlooks their continued use and meaning, as well as the

impact of development on their setting. Consequently, the cultural effects are evaluated incompletely, disregarding the integral role these sites play in community life.

Moreover, the assessment fails to address intangible cultural heritage, which includes the Gaelic language and local traditions, alongside the long-standing relationship between the community and its coastal environment. These elements are central to the area's identity but are omitted from the analysis, which represents a significant gap. Without including these factors, it is impossible to fully comprehend the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that aligns with recognised characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the assessment's legitimacy and does not adhere to established principles of participation concerning cultural and environmental interests.

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

From a policy perspective, these shortcomings place the proposal in direct conflict with National Planning Framework 4, especially regarding 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, constitutes a clear deviation from required policy standards.

In summary, the overall neglect of living heritage, intangible cultural values, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application fails to provide a sound basis for evaluating the true cultural cost associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with this proposal is significantly deficient and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been published. This lack of disclosure creates a substantial evidential gap, making it impossible for both the public and the competent authority to grasp the full extent of the social risks identified in the developer's own research.

Reports indicate 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 with the community and are therefore factual rather than speculative. The failure to make the full assessment available stifles proper scrutiny of the findings, thus limiting the capacity to evaluate their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal is seen as a direct threat to community identity and cohesion, with “cultural loss” noted within the developer’s findings. However, these serious impacts have not been adequately incorporated into the main application, nor have they been afforded appropriate consideration. The withholding of the comprehensive Social Impact Assessment conceals the genuine human and social costs associated with the development.

This lack of transparency is detrimental to 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 functionality may be at stake. By not providing the complete dataset, the application fails to supply a comprehensive evidential basis needed to assess the balance between benefits and harms.

From a policy standpoint, the application does not meet the requirements of the National Planning Framework 4 concerning health and wellbeing. Development is expected to promote positive health outcomes and minimise harm; however, the available evidence reveals existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural implications of this situation are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission within the application, which fails to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This failure obstructs a lawful determination and underscores the conclusion that the application lacks sufficient information to warrant approval.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly inadequate and does not truly reflect the extent of change or the sensitivity of the environment in West Lewis. Characterised by its open Atlantic horizon and undeveloped nature, the coastline conveys a strong sense of remoteness. The planned introduction of large-scale turbines near the shoreline would create an ongoing and overwhelming industrial presence, which would fundamentally alter this character and result in a permanent and irreversible transformation of the landscape.

The application fails to accurately represent the scale of this visual change. Given their size and proximity, the turbines would dominate the views from residential areas, historic sites, and well-frequented coastal locations. Such dominance would directly impact visual amenity and undermine the defining qualities of naturalness and remoteness. The assessment does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This situation raises the possibility that the magnitude of the visual impact has been understated, thus compromising the assessment's reliability.

Another notable deficiency is the failure to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting linked visually and spatially to the Atlantic horizon. The assessment considers these heritage assets in isolation rather than recognising their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital connections, altering how heritage assets are perceived and disrupting their links to the natural horizon. This transformation represents not merely a visual impact but a wider cultural and spatial harm that has not been properly assessed in the application.

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

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

Collectively, 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 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 fundamentally inadequate, lacking the detailed analysis necessary to evaluate

potential environmental effects. Substantial works on the seabed and installation activities will take place within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application relies on mitigation and contingency measures that are to be developed after consent is granted. This approach precludes any meaningful evaluation of the adequacy or effectiveness of such measures.

The reliance on unspecified future measures raises significant concerns, particularly given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats, which are susceptible to disturbances and contamination due to sediment. 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 the prevention, control, or monitoring of these risks.

Furthermore, there is a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. Without rigorous modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

The absence of well-defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the assessment of whether appropriate safeguards are established to address pollution incidents. This introduces a procedural risk and undermines the competent authority's ability to evaluate 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. Significant likely effects and their mitigation must be evaluated before consent is granted, and without this information, a lawful determination cannot be achieved. Moreover, the application fails to demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

In summary, the deficiencies surrounding the absence of clearly defined mitigation measures, inadequate management plans, and uncertainty regarding potential impacts lead to a materially deficient assessment. These failings obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal poses substantial risks to marine life and the local fishing industry, yet the assessment of fisheries and marine ecosystems is inadequate. The waters off the West Lewis coast are home to both a rich marine ecosystem and a vibrant fishing

community. However, the application does not convincingly demonstrate how these vital uses and habitats can be preserved or sustained without significant disruption.

A critical concern is the presumption that fishing activities can be shifted without adverse effects. The application lacks evidence regarding the availability or accessibility of alternative fishing grounds that could withstand increased pressure. This absence of information is troubling, as it raises the possibility of overfishing in other areas, potentially leading to broader economic ramifications for the local fishing fleet. Without a thorough, evidence-based evaluation, understanding the impacts on fisheries and associated livelihoods remains elusive.

Additionally, the proposal carries significant risks for marine species, particularly due to the underwater noise resulting from construction activities. Prolonged high-energy hammer piling is expected to cause disturbances over considerable distances, which may adversely affect species, including dolphins. The predicted disturbance to a notable portion of the local bottlenose dolphin population is a serious concern. Nonetheless, the application minimises the importance of these impacts without adequate supporting evidence.

There is a notable inconsistency in the application where the need for licenses to permit harm to European Protected Species is recognised, while simultaneously, impacts are described as negligible. This contradiction calls into question the reliability of the assessment and raises serious compliance concerns with the Habitats Regulations, especially when harm is anticipated to an extent that necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts stemming from multiple factors such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined pressures, it is impossible to determine the overall consequences for 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 provide evidence that the development can operate alongside existing marine users or mitigate unacceptable impacts on marine biodiversity, which precludes any conclusion that the proposal aligns with sustainable development principles.

In summary, the deficiencies in evidence concerning fishing displacement, the undervaluation of acoustic impacts, and the internal inconsistencies significantly undermine the assessment's credibility. These shortcomings hinder a comprehensive evaluation of the potential consequences for marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation regarding dark skies and nocturnal wildlife is a serious deficiency in the Environmental Impact Assessment. The West Lewis coastline is known for its

exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. The proposed development includes the installation of permanent red aviation lighting that would be visible over vast distances. This would create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time landscape.

The proposal fails to address how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the significance of dark skies to local identity and the emerging sector of astro-tourism. The absence of this analysis creates a notable gap in the overall assessment of both landscape and environmental effects.

Moreover, there is a complete lack of evaluation regarding the implications for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic responses, which can lead to disorientation and a heightened risk of collision. The application neglects to include any assessment of lighting impacts or a phototaxis study, failing to examine how aviation lighting might impact these species or exacerbate mortality rates.

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

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether the proposal could negatively impact protected species or designated sites. The necessary evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, particularly regarding the protection of natural areas and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of the night environment is a crucial aspect of the ecosystem.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against legal obligations,

national policy, and evidence standards. This application mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was noted. It is presented now under a more robust policy framework that places additional emphasis on biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are significant gaps in the evidential basis for this application. It lacks comprehensive baseline data, utilises an ambiguous design envelope, depends on unspecified mitigation measures, and omits crucial impact pathways related to nocturnal wildlife, the full extent of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Moreover, procedural deficiencies are evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, and the failure to provide a complete Social Impact Assessment is a substantial omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

There are unresolved environmental risks that remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

In summary, the application is fundamentally unfit for determination both procedurally and substantively. The extensive information deficiencies, along with policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application is refused entirely.

Additional Comments

I would like to strongly object to this monstrous project. It is going to ruin the Island in every way possible. It's too close to shore, the turbines are excessively huge. It's going to kill so many birds. Pollution risks. And the stunning dark skies and night sky is going to be ruined forever.

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: 3C6D8DF3

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 marine licensing and Environmental Impact Assessment procedures. The objection arises from a careful examination of the Environmental Impact Assessment Report and its supporting documentation, highlighting significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. Concerns are raised regarding the proposal's scale, proximity to the shoreline, and overall design, which may not align with statutory requirements, national policies, or the tenets of sustainable development.

The application is deficient in providing an adequate factual basis for a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and critical components of the proposal remain unclear. The flexible design framework utilised creates challenges in comprehending potential significant effects, while the dependence on unspecified mitigation strategies means that their effectiveness cannot be evaluated. Consequently, the documentation fails to furnish a comprehensive or informed understanding of the environmental, cultural, or community ramifications, with assertions of negligible or non-significant effects lacking robust evidential support.

Substantial policy inconsistencies are evident. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national mandates to safeguard biodiversity, address climate concerns, and maintain environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and compromise the capability of the competent authority to ascertain the development's acceptability under policy frameworks.

The proposal's unprecedented scale at this location, with large turbines placed near the coastline, raises significant concerns about landscape capacity, visual impact, and overall environmental consequences. Together, the lack of comprehensive information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy violations suggest 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 application fails to provide an adequate assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of delivering a systematic and reasoned evaluation of viable alternatives based on their environmental impacts, the submission merely recounts the project's development history. This narrative approach does not sufficiently demonstrate that less harmful options have been properly identified, evaluated, and chosen over more damaging solutions.

There is a conspicuous lack of transparent and evidence-based comparisons regarding potential offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered positioning turbines further offshore, where impacts on visual aesthetics, ecology, and coastal areas would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical role that distance from the shore plays in impact assessment, the absence of such an analysis precludes any determination that the proposed siting is the least harmful option available.

Moreover, the shortcomings extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The lack of a clear avoidance strategy and absence of comparative analysis point to a failure to implement mitigation by design, relying instead on measures that are applied after the design phase.

Consequently, the application does not prove that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a significant deviation from the established mitigation hierarchy, inhibiting the competent authority from determining whether more appropriate and less harmful alternatives are available. Without a rigorous alternatives assessment, it is impossible to assert that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this deficiency also compromises adherence to National Planning Framework 4, particularly in relation to the protection of natural environments, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a material shortcoming that contributes to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm indicates a significant shortfall in meeting the principles of sustainable development as outlined by statutory duties and national policy. It echoes the key issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the level of industrialisation was deemed unacceptable. This current application is presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are substantial gaps in the evidential basis provided for the proposal. Notably, there is a reliance on an undefined design envelope, incomplete baseline data, unspecified mitigation measures, and key impact pathways that have been overlooked, such as those concerning nocturnal wildlife, the entirety of the onshore infrastructure, and the effects on tourism. This leads to an Environmental Impact Assessment that is insufficient, failing to offer a comprehensive understanding of the potential significant effects or residual impacts.

Furthermore, the proposal displays evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment violates statutory obligations set forth by the Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment is a significant deficiency. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal is at odds with the National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural habitats, and cultural heritage. It fails to establish that the health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact analysis. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, which clouds the understanding of impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties surrounding environmental risks remain, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, which in some aspects are inconsistent with each other. The evidence threshold necessary to discount adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, coupled with conflicts with policy and unresolved environmental concerns, obstruct a lawful and evidence-based decision-making process. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm be denied in its entirety.

Additional Comments

Why are we still putting up these wind turbines when alternative measures are being explored and proving to be a good source of energy. This is laziness and greed from corporations.

Get the storage of all.this energy produced sorted before you allow decimation of another area of our beautiful.land and 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: DB9FCE7B

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment processes. The objection arises from a review of the Environmental Impact Assessment Report and related documents. It highlights significant deficiencies in planning, environmental considerations, cultural impacts, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns are raised regarding the proposal's scale, proximity to the shoreline, and design, as these factors challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis for a lawful determination. Important environmental data is absent, baseline information is insufficient and inconsistent, and vital components of the proposal remain undefined. The use of a flexible design framework does not allow for a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures means their efficacy cannot be evaluated. Consequently, the documents fail to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

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

The proposal's scale is unprecedented for this area, with large turbines sited near the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental effects. Overall, the lack of sufficient information, dependence on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species has significant deficiencies, leading to an incomplete understanding of the ecological receptors in the West Lewis

coastal environment. This area is highly sensitive and biologically active, yet the baseline data used is inadequate. The methodologies employed do not effectively capture important aspects such as species presence, behaviour, and habitat use, which undermines the assessment's ability to evaluate impacts accurately.

A notable gap is the treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise their use of coastal areas for foraging and movement. Without a proper assessment of their core foraging range and behaviour, the potential impacts of construction activities, noise, and increased human activity remain insufficiently evaluated. This flaw weakens the conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks is hampered by the over-reliance on aerial surveys, which carry a significant risk of detection bias, particularly under Atlantic conditions. Such reliance likely leads to an underestimation of their presence, especially in light of established land-based observations that demonstrate frequent use of these waters. The failure to integrate or adequately consider this data results in a further incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, there remains a level of uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out in the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This uncertainty prevents the exclusion of adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. Given these circumstances, it is clear that consent cannot be granted lawfully.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies impede a robust evaluation of impacts on marine ecology and protected species and contribute to the overall conclusion that the application lacks a sound evidential basis.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply interconnected. The application employs a simplistic perspective, viewing heritage as a collection of isolated, static assets, rather than appreciating their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites,

notably the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices; however, the assessment categorises them merely as static features. This oversight neglects their continued significance and the implications that development may have on their context. Such a mischaracterisation results in an incomplete understanding of cultural effects and overlooks their importance in community life.

Moreover, the assessment does not address intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship the community maintains with the coastal environment. These aspects are vital to the area's identity yet are completely omitted from the evaluation, marking a considerable gap. Without acknowledging these factors, the cultural impact of the proposed development cannot be adequately grasped.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population is recognised as having a distinct cultural identity, akin to that of Indigenous Peoples, yet there has been no undertaking of Free, Prior and Informed Consent. This lack of substantial engagement undermines the assessment's validity and fails to adhere to established principles regarding participation in matters affecting cultural and environmental interests.

A further procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, particularly concerning 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 policy requirements.

In conclusion, the collective failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a notable evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application does not offer a sound foundation for determining the true cultural cost associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal's assessment of visual, seascape, and landscape impacts is severely lacking, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by its unspoilt Atlantic horizon, which contributes to its undeveloped nature and profound sense of remoteness. The planned installation of large-scale turbines near the shoreline would result in a continuous industrial presence that would fundamentally change this character,

leading to a permanent and irreversible transformation of the landscape.

The application inadequately addresses the magnitude of visual change that would occur. Due to their scale and proximity, the turbines would overpower views from residential areas, historic sites, and popular coastal locations, thus directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. This significant impact has not been properly conveyed, which is particularly concerning given the sensitivity of the landscape in question.

Methodological issues are evident in the selection and presentation of visual viewpoints. There is evidence indicating that these viewpoints may not adequately reflect the most sensitive receptors or potential worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are linked to the broader landscape by visual and spatial relationships with the Atlantic horizon. The evaluation incorrectly treats these assets as isolated, failing to recognise their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape threatens to sever these vital connections, altering the context in which heritage assets are experienced and disrupting their relationship to the natural horizon. This signifies not only a visual impact but also a broader cultural and spatial detriment that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The anticipated scale of change is incompatible with the mandate to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further weakens any assertions of policy compliance.

Moreover, it is evident that the impacts outlined cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Therefore, the resulting change would be fundamental and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment is inadequate in representing the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the position that the proposal is incompatible with the preservation of this landscape.

FISHERIES AND MARINE LIFE

The assessment presented within the application lacks the necessary depth to evaluate the impacts on fisheries and marine life adequately. The waters off the West Lewis coast not only sustain a diverse marine ecosystem but also support an active fishing industry. However, the application fails to demonstrate that these habitats and uses can be preserved without substantial disruption.

A significant concern lies in the assumption made regarding the displacement of fishing activities. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can accommodate increased fishing pressure. This gap is critical, as the potential for overfishing in other areas poses risks to the local fishing fleet's economic stability. Without a rigorous evidence-based assessment, the consequences for fisheries and local livelihoods remain poorly understood.

The proposal introduces considerable risks to marine species, particularly due to underwater noise generated by construction activities. The use of high-energy hammer piling over an extended duration is expected to cause disturbances across vast areas, impacting species such as dolphins. Notably, the projected disturbance to a significant portion of the local bottlenose dolphin population raises alarm; however, the application diminishes the seriousness of these effects without adequate supporting evidence.

An inconsistency is evident in the application's acknowledgement of the need for licences to permit harm to European Protected Species, while simultaneously characterising impacts as negligible. This contradiction calls into question the credibility of the assessment and raises compliance concerns with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to account for cumulative impacts that arise from various pressures, including habitat disruption, noise, and the displacement of fishing activities. The absence of a comprehensive analysis of these combined effects hampers the ability to ascertain the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not substantiate its compliance with National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby obstructing any conclusion regarding the proposal's sustainability.

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

TOURISM

The assessment concerning tourism impacts associated with the proposed development is critically inadequate and neglects to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which has experienced notable growth from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. Although the application indicates that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviours, or overall economic contributions.

Furthermore, the application does not analyse how the industrialisation of the seascape and the deterioration of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. Without this crucial analysis, it remains unclear whether the proposed development would bring about a net economic benefit or threaten an established and growing sector. The failure to take into account the significance of environmental quality in supporting tourism, including the vital role of unspoiled landscapes and dark skies in shaping visitor experiences and the growth of nature-based and astro-tourism markets, exacerbates this issue. Additionally, the lack of a Dark Skies Assessment results in a significant gap in understanding the impacts on a recognised and expanding aspect of the local economy.

In an island community characterised by limited economic diversification, the omission of tourism impact assessments has far-reaching 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 required by 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 need to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to evaluate the economic consequences of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and recognising the economic dependency of the island create a substantial evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

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

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

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

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

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

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: 59DFEB07

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with marine licensing and Environmental Impact Assessment requirements. The objection arises from a thorough examination of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and a rich cultural heritage. The magnitude, proximity, and design of the project raise serious doubts about its alignment with statutory obligations, national policies, and sustainable development principles.

Crucial environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain unclear. The proposal employs a flexible design framework, which hinders a comprehensive understanding of potential significant effects. Moreover, the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the available documentation does not allow for a thorough understanding of the environmental, cultural, or community impacts, and the assertions of negligible or insignificant effects lack solid evidence.

The application demonstrates evident policy conflicts. It appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It has not shown that it meets national requirements for safeguarding biodiversity, climate considerations, and environmental integrity. These conflicts are critical to the statutory tests necessary for granting consent and call into question whether the development can be deemed acceptable in policy terms.

The unprecedented scale of the proposal, with substantial turbines positioned in close proximity to the shoreline, raises significant issues regarding landscape capacity, visual impact, and environmental effects. Collectively, the lack of sufficient information, dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy requirements illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to deliver a dependable account of the anticipated environmental consequences of the proposal. One significant concern is the flexible Project Design Envelope that does not commit to specific dimensions, layouts, or configurations of turbines. This introduces considerable uncertainty and hampers the consistent application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the impacts outlined may not truly represent the final development, obstructing both the public and the competent authority from grasping the actual environmental effects involved.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be managed at a later stage undermines meaningful evaluation of their effectiveness and precludes thorough assessment of residual impacts. This deferral of crucial information to stages following consent is procedurally unacceptable and contradicts the core purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures must be clearly established prior to determination.

There are also notable gaps in evidence, which include shortcomings in baseline data, methodological limitations, and the use of assumptions in lieu of site-specific evidence. Such deficiencies lead to uncertainty concerning the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes stipulations on 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 measures, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned comparison of realistic alternatives, which is a fundamental requirement of the Environmental Impact Assessment regime. Instead of presenting a transparent analysis based on

environmental effects, it offers a narrative account of project development. This omission indicates that the identification, assessment, and selection of less harmful options in preference to more damaging solutions have not been adequately conducted.

Furthermore, there is a notable lack of evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the possibility of placing turbines further offshore has been seriously evaluated, despite the likely reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the significance of proximity to the shore in assessing impact, underscores the importance of this analysis. Without it, one cannot conclude that the proposed siting is the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, where there is little evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant locations such as Barvas Cemetery. The absence of a clear strategy to avoid impacts, along with the lack of comparative analysis, suggests that mitigation by design has not been applied, relying instead on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been effectively minimised through careful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to assess whether more appropriate and less harmful alternatives exist. The lack of a robust alternatives assessment ultimately raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not been sufficiently evaluated, rendering it incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system that has not been adequately assessed in relation to marine ecology and protected species. The existing assessment fails to provide a complete and reliable understanding of ecological receptors, as it is based on incomplete baseline data and methodologies that do not adequately capture the presence, behaviour, and habitat use of various species. This inadequacy means that any evaluation of potential impacts is fundamentally flawed.

Particularly concerning is the treatment of otters, a European Protected Species, which are not properly recognised in the application. Their active use of coastal areas for

foraging and movement has not been sufficiently assessed, with the core foraging range and behavioural patterns overlooked. This lack of consideration means that the potential impacts from construction disturbance, noise, and increased human activity have not been effectively evaluated, undermining any conclusions about the absence of significant effects on this species.

Similarly, the assessment of basking sharks suffers from significant deficiencies. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, likely leading to an underestimation of their presence in these waters. This is especially concerning given that established land-based observations indicate a frequent use of the area by these sharks. The failure to incorporate or adequately consider such critical data results in an incomplete baseline and weakens the reliability of the conclusions presented.

These methodological shortcomings lead to conclusions about negligible or non-significant effects that are primarily based on assumptions rather than sound evidence. The lack of adequate baseline data also hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating uncertainty about the actual risks facing marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This uncertainty introduces challenges in excluding adverse effects beyond a reasonable scientific doubt, engaging the precautionary principle. In light of these circumstances, granting consent would not be legally justifiable.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly concerning the West Lewis coastline, which is a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application takes a narrow view, treating heritage as isolated, static elements and neglecting their ongoing social, cultural, and spiritual significance within the community.

Significant shortcomings are evident in the handling of culturally important sites like the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and spaces for spiritual practice, yet the assessment reduces them to static features without acknowledging their continued use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to a partial evaluation

of cultural effects and dismisses their integral role in community life.

Moreover, the assessment neglects intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the identity of the area but are entirely missing from the evaluation, creating a significant gap. Ignoring these factors undermines the ability to fully understand the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity recognised as an Indigenous People, yet the process of Free, Prior and Informed Consent has not been undertaken. The lack of meaningful engagement calls into question the legitimacy of the assessment and fails to honour established principles of participation in matters affecting cultural and environmental interests.

A critical procedural failure is the omission of a compliant Island Communities Impact Assessment, a statutory requirement under 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 impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to account for both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear deviation from policy expectations.

In summary, the oversight of living heritage, intangible cultural values, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been sufficiently evaluated, leaving the application without a solid foundation to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment commissioned by the developer represents a significant evidential gap in the planning application. This gap hinders the public and competent authorities from understanding the full extent of social risks identified through the developer's own research. Summaries suggest that local residents are already experiencing measurable levels of stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement with the community and are therefore factual rather than speculative. However, without access to the complete assessment, there is insufficient scrutiny of the findings, which limits the determination of their significance in the decision-making process.

Furthermore, evidence indicates that the proposal threatens community identity and

cohesion, with the developer acknowledging “cultural loss” in their findings. Despite the recognition of these impacts, they have not been fully integrated into the main application or given the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development, which is crucial information for stakeholders.

The absence of transparency also undermines the Environmental Impact Assessment process, as a thorough understanding of the social, economic, and health impacts is essential for developments of this nature, particularly when community character and functioning are at stake. By failing to provide the complete dataset, the application lacks a comprehensive evidential basis required to assess the balance between the proposed benefits and potential harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to support positive health outcomes and to avoid causing harm, yet the available evidence highlights existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to verify adherence to this policy.

The procedural ramifications of this non-disclosure are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This omission constitutes a material shortcoming in the application and represents a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the lack of disclosure regarding the full Social Impact Assessment, coupled with documented 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 does not possess sufficient supporting information.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is known for its clean coastal waters and important habitats, which are particularly vulnerable to contamination and sediment disturbance. The proposal includes significant seabed preparation and installation activities within a high-energy Atlantic environment; however, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application depends on mitigation and contingency measures that are to be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns given the sensitivity of the surrounding environment. While the application does acknowledge risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide enough detail on how these risks will be prevented, controlled, or monitored.

Additionally, 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 is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to potential consequences for marine species and habitats that have already been identified as sensitive.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring critical environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. Likely significant effects and necessary mitigation must be evaluated prior to consent, and the absence of such information prevents a lawful determination. The application also does not adequately demonstrate compliance with the policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of evidence regarding the potential displacement of fishing activity. It assumes that such displacement can occur without negative consequences, yet it fails to establish whether alternative fishing grounds are available, accessible, or capable of accommodating the increased pressure. This oversight is critical, as the risk of overfishing in other areas poses a threat not only to marine life but also to the economic stability of the local fishing fleet. The implications for fisheries and livelihoods remain inadequately addressed, leaving serious questions about the long-term sustainability of these practices.

Moreover, the risks posed to marine species, particularly from underwater noise during construction, are alarmingly understated. The use of high-energy hammer piling is anticipated to generate disturbances over considerable distances, which may adversely affect species such as dolphins. The anticipated impact on a significant portion of the local bottlenose dolphin population raises profound concerns, yet the application minimizes these effects without providing compelling supporting evidence.

There is a notable inconsistency within the application itself, where it acknowledges the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction not only undermines the

credibility of the assessment but also raises significant doubts about compliance with the Habitats Regulations, particularly in scenarios where anticipated harm would necessitate legal authorisation.

Additionally, the assessment does not adequately address the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to gauge the overall impact on marine ecosystems and socio-economic conditions effectively.

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 harmoniously with current marine users or that it can avert unacceptable impacts on marine biodiversity, which are essential for concluding that the proposal aligns with the principles of sustainable development.

In summary, the glaring deficiencies regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment both incomplete and unreliable. These issues critically hinder any reliable evaluation of the impacts on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm stands as a clear failure to meet the standards of sustainable development, as established by statutory obligations, national policy, and evidential criteria. It mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

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

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

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

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

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

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

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

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: 1A08F368

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 relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and related documentation, highlighting several deficiencies related to planning, environmental concerns, cultural aspects, and procedural matters. The development is set to take place off the west side of the Isle of Lewis, a region known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks a sufficient evidential basis necessary for a lawful determination. There is critical missing environmental data, while the baseline information provided is limited and inconsistent. Furthermore, important aspects of the proposal remain undefined. The flexible design framework used hinders a clear understanding of likely significant effects. Additionally, the application relies on mitigation measures that have not yet been specified, making it impossible to assess their effectiveness. Consequently, the documentation does not allow for a complete or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are significant policy conflicts apparent in the application. It appears 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. The proposal fails to demonstrate compliance with national requirements that protect biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests needed for consent and undermine the competent authority's ability to conclude that the development is acceptable from a policy perspective.

The scale of this proposal is unprecedented in the area, with large turbines positioned near the shoreline. This raises substantial concerns about landscape capacity, visual dominance, and environmental impact. The lack of adequate information, the reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policies indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, it is essential that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally flawed, lacking a reliable understanding of the ecological receptors in the West Lewis

coastal environment. This area is a biologically active marine system, yet the methodologies used do not adequately capture critical aspects such as species presence, behaviour, and habitat use. Consequently, the conclusions drawn fail to provide a robust evidential basis for evaluating potential impacts.

Significant omissions are evident in the treatment of otters, which are a European Protected Species. The application does not adequately assess their foraging and movement in coastal areas, neglecting to consider their core foraging range and behavioural patterns. This oversight means that the potential impacts of construction-related disturbance, noise, and increased activity remain inadequately evaluated, undermining any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks also reveals substantial deficiencies, as it relies on aerial surveys that introduce considerable detection bias, particularly in Atlantic conditions. This reliance likely leads to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate relevant data further contributes to an incomplete baseline, ultimately diminishing the reliability of the presented conclusions.

These methodological shortcomings result in claims of negligible or non-significant effects that are based on mere assumptions rather than sound evidence. The lack of sufficient baseline data also hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, thereby generating uncertainty regarding the actual level 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 has not properly identified or assessed protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these conditions, granting consent is not legally justifiable.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application raises significant concerns regarding its reliability due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. It fails to demonstrate, to the required evidential standard, that internationally important seabird populations, many of which are already in decline, will not be adversely affected. The west coast of the Isle of Lewis supports these critical

seabird populations, and the development is situated within key foraging areas and migratory pathways. However, the implications of displacement, collision risk, and habitat loss are not adequately evaluated.

There is a fundamental contradiction in the application, where the developer concludes no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only warranted where significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not adequately backed by the supporting evidence.

The assessment neglects to provide sufficient evidence that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling approaches leads to uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality, especially given incomplete baseline data and incomplete understanding of behavioural responses.

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

From a regulatory standpoint, the application does not meet the evidential threshold required to conclude 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 invokes the precautionary principle and prevents a lawful conclusion in favour of consent.

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

In conclusion, the assessment is ultimately unreliable due to its internal contradictions, methodological flaws, and insufficient evidence, all of which hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not satisfy the statutory requirements necessary for approval.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The procedural implications of this situation are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This omission within the application indicates

a failure to meet the evidential standards required under the Environmental Impact Assessment regime.

Moreover, there is a significant deficiency in the assessment of social impacts, health, and wellbeing, which lacks the transparency needed for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been made available. This creates a considerable evidential gap, hindering both the public and the competent authority from comprehensively understanding the social risks highlighted in the developer's own research.

Available summaries reveal that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and are therefore not speculative in nature. Nonetheless, the failure to disclose the complete assessment obstructs proper examination of the findings and restricts the capacity to ascertain their significance in the decision-making process.

In addition, the proposal is perceived as a direct threat to community identity and cohesion, with “cultural loss” acknowledged in the developer's findings. Despite this recognition, such impacts have not been adequately incorporated into the main application or assigned appropriate significance. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly in relation to potential effects on community character and functionality. By failing to provide the complete dataset, the application does not offer a sufficient evidential foundation for weighing benefits against harm.

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

In conclusion, the combination of non-disclosure of the full Social Impact Assessment and the evidence of existing negative impacts renders the assessment incomplete and unreliable. This situation hinders a lawful determination and reinforces the assertion that the application lacks adequate information to support it.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation concerning seascape, landscape, and visual impacts is significantly inadequate and does not appropriately reflect the extent of change or the sensitivity of the affected environment. The character of the West Lewis coastline is marked by an open Atlantic horizon, an undeveloped landscape, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shoreline would establish a continuous industrial presence that would fundamentally disrupt this character, leading to a permanent and irreversible alteration of the landscape.

Methodological issues arise regarding the choice and depiction of visual viewpoints, with evidence indicating that these viewpoints may not comprehensively represent the most sensitive receptors or the most severe scenarios, especially concerning significant cultural heritage sites and high-value landscapes. This raises concerns that the projected visual impact might be understated, thereby compromising the assessment's reliability.

Moreover, the application fails to evaluate the interconnectedness of landscape, seascape, and cultural heritage adequately. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of an overarching landscape setting linked by both visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these sites as isolated entities, neglecting their interdependence, which results in a deficient appraisal of the impacts on their setting and cultural importance.

The potential industrialisation of the seascape would disrupt these relationships, modifying the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not merely a visual impact but also a wider cultural and spatial detriment that has not been sufficiently examined in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The scale of transformation is inconsistent with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment weakens any assertion of policy compliance.

It is evident that the identified impacts are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. Consequently, the resultant change is fundamental and permanent, rendering any attempts at mitigation insufficient to achieve an acceptable level of impact.

In summary, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the interconnected dynamics of landscape and heritage. These shortcomings hinder a reliable evaluation and strongly support the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal includes significant seabed preparation and installation works in a high-energy Atlantic environment. However, it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This deficiency prevents a proper evaluation of the likely environmental effects, relying instead on mitigation and contingency measures that will be prepared after consent. Such an approach does not allow for a meaningful assessment of their adequacy or effectiveness.

The West Lewis coastline, known for its clean coastal waters and important habitats, is particularly sensitive to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these issues will be prevented, controlled, or monitored.

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

The application further lacks detailed emergency response procedures, which exacerbates these concerns. By postponing contingency planning to a post-consent phase, it hinders the evaluation of whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risks and diminishes the ability of the competent authority to assess environmental protection measures when making a determination.

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

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and uncertainty surrounding potential impacts result in a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant risks to marine species, particularly due to the underwater noise created during construction. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life across large areas, notably impacting local populations of dolphins. The potential disturbance to a considerable segment of the bottlenose dolphin population is a major concern;

however, the application fails to adequately address the severity of these effects and lacks sufficient supporting evidence.

In addition to the risks to marine species, the application inadequately assesses the implications for fisheries and marine life, providing a poor evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a vital fishing industry, yet the application does not demonstrate how these habitats and uses can be preserved or maintained without causing significant disruption.

A crucial flaw in the application is the assumption that fishing activities can be relocated without any negative consequences. The proposal lacks evidence to confirm that alternative fishing grounds are available and viable for supporting the additional pressure from displaced activities. This significant omission raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the assessment fails to adequately address cumulative impacts that may arise from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The inability to evaluate these combined effects inhibits a full understanding of the overall impact on marine ecosystems and socio-economic conditions.

The application also shows a notable inconsistency regarding the need for licenses to permit harm to European Protected Species while simultaneously claiming that impacts are negligible. This contradiction seriously undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

From a policy standpoint, the application does not prove compliance with the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal is sustainable.

Overall, the lack of substantiated evidence concerning fishing displacement, the minimisation of acoustic impacts, and the inconsistencies throughout the assessment render it incomplete and unreliable. These shortcomings hinder the ability to conduct a thorough evaluation of the potential impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the crucial aspects of dark skies and nocturnal wildlife, marking a significant omission. The West Lewis coastline boasts exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly for developing sectors like astro-tourism. However,

the proposal includes permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect on the western horizon, fundamentally changing the night-time environment.

Furthermore, the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors has not been evaluated. This oversight is especially troubling given the importance of dark skies to the area's identity. The lack of consideration for these impacts results in a clear deficiency in the overall environmental and landscape assessment.

Equally concerning is the complete absence of an evaluation of the effects on nocturnal wildlife. Sensitive species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are at risk from artificial lighting due to phototaxis, which can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting might affect these species or contribute to mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or its associated risks. Kittiwakes, for instance, may forage or migrate at night and are similarly vulnerable to disorientation caused by artificial lighting, yet this risk remains unexamined. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and obstructing a lawful determination.

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

In summary, the failure to assess dark skies and nocturnal wildlife creates a substantial evidential gap. Without baseline data, impact modelling, and species-specific analysis, the application remains incomplete and fails to support a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the criteria for sustainable development as set out by statutory duties, national policy, and evidential standards. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a policy framework that

prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not offer a comprehensive or reliable evidential basis for assessment.

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

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

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

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

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

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

Additional Comments

I object to the wind turbines planned to this very special area in the Outer Hebrides. Marine wildlife are very sensitive to noise pollution, many using echolocation and sonar to navigate. We have already had mass strandings of whales around the coastline. These waters are also home to many rare and red-listed birds and this has the potential to disrupt their migration passage standing right on their flyway along the west coast of the UK on their way to Iceland and the Arctic. We already know the fragile machair just onshore is rare and precious, and unique to these islands. Disruption on the seabed has the potential to disrupt sea grass beds that help prevent the damage from storm surge (for which they are increasing in frequency and intensity) and the impact on coastal erosion. It will also markedly be an eyesore dominating much of the skyline at such heights, numbers and proximity to the shoreline. There is also emerging research from Shetland where the noise and vibration has the effect of impacting human physical and mental health too. I reiterate, this is a special area for wildlife on one of the most nature-depleted islands in the UK and I do not wish to see these built here.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 0B3F89A3

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

Dear Sir/Madam

This letter formally objects to the application for the Spiorad na Mara Offshore Wind Farm, submitted under marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. The development site is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural heritage. Concerns regarding the scale, proximity, and design of the proposal challenge 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 notable absence of critical environmental data, with baseline information being limited and inconsistent. Key elements of the proposal remain unclear. The flexible design framework employed hinders a comprehensive understanding of the likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a thorough understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

There are evident and substantial conflicts with existing policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent, undermining the competent authority's ability to assess the development's acceptability from a policy perspective.

The unprecedented scale of the proposal introduces major concerns related to landscape capacity, visual dominance, and environmental ramifications, particularly with the large turbines located in close proximity to the shoreline. The combination of insufficient information, reliance on undefined mitigation strategies, 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 is warranted.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a complete, transparent, or trustworthy depiction of the likely environmental effects 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 lack of specificity hinders the ability to consistently apply a worst-case scenario, compromising the assessment's integrity. As a result, the impacts outlined may not accurately represent the development that will ultimately be constructed, limiting both the public's and the competent authority's capacity to grasp the full extent of environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental harm will be addressed later precludes any thorough evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation measures be clearly established prior to determination.

Moreover, there are substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. This leads to uncertainty about the magnitude and significance of impacts, especially where conclusions regarding 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 aligned with statutory requirements.

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

Collectively, the dependence on an undefined design envelope, the absence of specified mitigation measures, and the existing gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects and result in the competent authority being unable to determine the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application exhibits significant deficiencies in its assessment of alternatives, failing to satisfy the statutory requirements of the Environmental Impact Assessment regime.

It does not provide a structured and reasoned comparison of feasible alternatives based on their environmental impacts. Instead, it offers a narrative account of project development, which does not adequately demonstrate that less harmful options have been identified, evaluated, and selected over more damaging alternatives.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has genuinely considered the possibility of situating turbines further offshore, where the associated visual, ecological, and coastal impacts would likely be lessened. Considering the sensitivity of the West Lewis coastline, and the crucial role that proximity to shore plays in assessing impact, the lack of this analysis hinders any conclusion that the proposed location is the least damaging option available.

Furthermore, these inadequacies extend to the evaluation of cable routing and landfall assessment. There is insufficient evidence demonstrating that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy, along with the absence of comparative analysis, implies that mitigation through design has not been implemented, resulting instead in a reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight represents a disregard for the established mitigation hierarchy, which obstructs the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives available. The omission of a robust alternatives assessment precludes the conclusion that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency weakens adherence to 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, contributing to the overarching determination that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to adequately meet the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4. There is a significant deficiency in the assessment of marine ecology and protected species, which provides an unreliable understanding of ecological receptors within the sensitive West Lewis coastal environment. The methodologies used are inadequate and do not sufficiently capture crucial aspects of species presence, behaviour, and habitat use, thereby undermining the evidential basis for evaluating potential impacts.

One critical shortcoming is the treatment of otters, a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. This oversight neglects their core foraging range and behavioural patterns, resulting in an inadequate assessment of the potential effects from construction disturbance, noise, and increased activity. Such omissions raise significant doubts about the conclusions drawn regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks suffers from methodological flaws, notably the reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or adequately consider these observations leads to an incomplete baseline and undermines the reliability of the conclusions presented.

The methodological limitations in the assessment result in conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. Furthermore, the lack of sufficient baseline data hinders any meaningful assessment of cumulative and indirect impacts, including variations over seasons and interactions within the wider ecosystem. This creates uncertainty regarding the true scale of risk posed to marine species and habitats.

When considering these factors, the overall assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These deficiencies prevent a thorough evaluation of impacts on marine ecology and protected species, contributing to the conclusion that the application lacks a solid evidential foundation. In light of the uncertainties introduced, consent for the application cannot be lawfully granted.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing raises significant concerns regarding the adequacy of the evaluation process. Although the developer commissioned a Social Impact Assessment that included input from local residents through focus groups, the full report remains unpublished. This creates a substantial evidential gap, inhibiting the public and the competent authority from comprehensively understanding the social risks identified in the developer's own research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects stem from direct community engagement rather than speculative assumptions. Nonetheless, the non-disclosure of the complete assessment hampers thorough scrutiny of these findings and restricts the ability to assess their importance within the decision-making framework.

Furthermore, the proposal is viewed by many as a direct threat to community identity and cohesion, with findings indicating a risk of “cultural loss.” Despite this, these social impacts have not been appropriately integrated into the primary application or given adequate consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The implications for the Environmental Impact Assessment process are serious. To fully understand the social, economic, and health impacts of developments of this magnitude, particularly those that may alter community character, access to the complete dataset is essential. 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 demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Development proposals must promote positive health outcomes and mitigate harm. However, the evidence that has been made available suggests existing adverse effects that remain undisclosed. Without the complete assessment, compliance with relevant policy cannot be established.

The procedural ramifications are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without the complete Social Impact Assessment. This omission constitutes a material failure in the application, undermining the evidential requirements of the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the full Social Impact Assessment and 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 lacks sufficient information to warrant approval.

CONSTRUCTION AND POLLUTION RISKS

The application proposes substantial seabed preparation and installation works in a high-energy Atlantic environment; however, the assessment of construction and pollution risks is incomplete. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, which results in reliance on mitigation and contingency measures that are to be prepared after consent. This approach prevents any meaningful evaluation of their adequacy or effectiveness.

The lack of defined future measures is especially concerning given the sensitivity of the receiving environment along the West Lewis coastline, which supports clean coastal waters and habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient detail on prevention, control, or monitoring of these risks.

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

resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the extent, duration, or ecological effects of these impacts cannot be determined. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and a lawful determination cannot be made in the absence of such information. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the shortcomings arising from the absence of defined mitigation measures, lack of detailed management plans, and the uncertainty regarding potential impacts render the assessment materially deficient. These issues hinder a robust evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation regarding fisheries and marine life is inadequate, lacking a thorough analysis of both ecological and socio-economic effects. The coastal waters off West Lewis are home to a rich marine ecosystem as well as a vibrant fishing industry, yet the application does not adequately ensure the safeguarding or preservation of these activities and habitats from significant disruption.

A critical concern arises from the presumption that fishing activities can be relocated without repercussions. The application fails to furnish evidence demonstrating the availability, accessibility, or capacity of alternative fishing grounds to absorb increased pressure. This gap is crucial, as such displacement poses a risk of overfishing in other areas and could lead to broader economic ramifications for the local fishing fleet. Without a detailed and evidence-based assessment, the implications for both fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to underwater noise produced during construction activities. The use of high-energy hammer piling over prolonged durations is anticipated to disturb marine life over extensive distances, impacting species such as dolphins. The forecasted disruption to a notable segment of the local bottlenose dolphin population raises serious issues, yet

the application minimizes the significance of these impacts without adequate supporting evidence.

There exists an apparent contradiction within the application that acknowledges the necessity of licences to permit harm to European Protected Species while concurrently characterising those impacts as negligible. This inconsistency calls into question the credibility of the assessment and raises compliance issues with the Habitats Regulations, especially in instances where anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to address the cumulative impacts stemming from various pressures, such as habitat disruption, noise pollution, and fishing activity displacement. In the absence of a thorough evaluation of these combined effects, it is impossible to ascertain the overall consequences for marine ecosystems and socio-economic conditions.

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

In conclusion, the combination of insufficient evidence concerning fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment collectively render it incomplete and untrustworthy. These shortcomings hinder a thorough evaluation of impacts on marine life and fisheries.

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.

Additional Comments

Large scale, privately owned projects which don't present any immediate, local benefits to the community, and that comes with significantly more risk to the environment, to industry, to tourism should be carefully considered.

Projects that support self sufficiency, driven by community ownership, with direct benefits to the wider community should be looked at here. Where a place has a lot to lose this simply isn't worth it. It's just exploitation, from a foreign company.

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: B4397125

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regulations. It arises from an evaluation of the Environmental Impact Assessment Report and the associated documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. Concerns about the scale, proximity, and design of the project question its alignment with statutory requirements, national policies, and the tenets of sustainable development.

The application lacks an adequate evidential basis necessary for lawful determination. There are notable gaps in critical environmental data, with baseline information appearing limited and inconsistent, while key elements of the proposal remain unspecified. The adoption of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the available documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, rendering unsupported the claims of negligible or non-significant effects.

Additionally, there are substantial conflicts with established policies. 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 adequately demonstrate that national obligations to protect biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies challenge the statutory tests for consent and impede the competent authority's ability to determine the project's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines situated near the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and not capable of supporting a lawful determination. In light of these factors, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not offer a clear or dependable account of the potential environmental effects of the proposal. The application employs a flexible Project Design Envelope without committing to specific turbine dimensions or layouts, which creates considerable uncertainty. This flexibility hinders the ability to apply a worst-case scenario consistently and compromises the assessment's integrity. As a result, the impacts presented may not accurately represent the development that will ultimately be built, which limits both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

Additionally, the application depends significantly on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent based on the expectation that environmental harm will be addressed later undermines any meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information to stages following consent is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates clear identification of likely significant effects and mitigation before determination.

There are substantial evidential shortcomings, such as gaps in baseline data and limitations in methodology, alongside reliance on assumptions instead of site-specific evidence. Consequently, there is uncertainty regarding the scale and significance of impacts, especially where findings of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

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

In summary, the combination of an undefined design envelope, unspecified mitigation, and deficiencies in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and thorough assessment of environmental effects and indicate that the competent authority cannot make a determination based on the provided information.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is lacking and does not recognise the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are intertwined. Instead, the application simplifies heritage, viewing it as a collection of isolated, unchanging assets

without acknowledging their ongoing social, cultural, and spiritual roles within the community.

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing raises serious concerns about the evaluation's validity. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents. However, the complete report has not been made available, creating a significant gap in

evidence. This absence of information obstructs both public understanding and the competent authority's ability to assess the social risks identified by the developer's own research.

Existing summaries reveal that residents are facing measurable stress, anxiety, and concern linked to the scale and proximity of the proposal. These findings stem from direct community engagement rather than speculation. Nevertheless, the failure to disclose the entire assessment hampers scrutiny of the results and limits the capacity to ascertain their relevance within the decision-making process.

Moreover, the proposal is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these impacts have not been adequately incorporated into the main application or given due consideration. The withholding of the full Social Impact Assessment obscures the actual social and human costs associated with the development.

This transparency issue undermines the Environmental Impact Assessment process. Understanding the social, economic, and health implications is crucial for projects of this magnitude, particularly when community character and functioning may be influenced. The application's failure to provide the full dataset means it lacks a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid harm, yet current evidence suggests existing negative effects have not been fully revealed. Without the complete assessment, compliance with this policy cannot be verified.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents 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, alongside evidence of existing adverse impacts, makes the assessment incomplete and unreliable. This situation hinders lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is significantly inadequate and does not properly reflect the scale of change or the sensitivity of the environment. The open Atlantic horizon and undeveloped character of the West Lewis coastline contribute to a strong sense of remoteness. The proposed large-scale turbines located near the shoreline would create an overwhelming industrial presence, fundamentally changing this character and resulting in a permanent transformation of the landscape.

The application fails to accurately represent the extent of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would negatively affect visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not properly communicate the significance of these impacts within the context of such a sensitive landscape.

There are also concerns about the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, which undermines the reliability of the assessment.

Another significant shortcoming is the lack of an evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. The Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets as separate entities, failing to acknowledge their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The scale of proposed changes is incompatible with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines claims of compliance with policy.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is a significant misalignment with the principles of sustainable development as required by statutory obligations,

national policy, and evidential standards. This application mirrors the key issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being put forward under an enhanced policy framework that prioritises biodiversity, peatland conservation, landscape preservation, and the wellbeing of communities, the application falls short in critical areas.

A reliable and complete evidential basis for decision-making is lacking. There are notable gaps in baseline data, and the continued reliance on an undefined design envelope poses additional concerns. Furthermore, it depends on unspecified mitigation measures and fails to consider important impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a thorough understanding of likely significant effects and residual impacts.

In addition to these substantive issues, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the lack of a comprehensive Social Impact Assessment represents a material omission that hinders a proper evaluation of impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies are significant enough to deem the application unsuitable for determination.

The proposal also stands in opposition to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. The proposal fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, notably due to the absence of tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been sufficiently assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially serious. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and making it impossible to lawfully conclude that the impacts are acceptable.

Moreover, the proposal threatens to create substantial and irreversible alterations to a notably sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and the negative impact on tourism represent permanent changes that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, alongside policy conflicts and unresolved environmental risks, precludes a lawful, evidence-based decision. The competent

authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to compel the submission of the necessary missing information.

In light of these considerations, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Additional Comments

I do not live on Lewis but I understand and empathise with the feelings of the community. It is a gross imposition to allow a foreign country to erect such a monstrously large eyesore, destroying the landscape and horizon in a place whose beauty is exceptional and sacred. Not to mention the myriad of destructive elements to the environment, nature and wildlife. And, as a final slap in the face, there is absolutely no benefit to anyone near or far. The community and their choices are sacrosanct. No council or landowner has any right to overrule community decisions.

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: 31BA47AC

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

Dear Sir/Madam

This letter represents a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment requirements. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and its accompanying documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, nearly pristine environment, and rich cultural heritage. The dimensions, closeness to the coast, and design of the wind farm present serious questions about its alignment with statutory obligations, national policies, and the tenets of sustainable development.

A primary concern is the lack of adequate evidence supporting a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and critical components of the proposal are not clearly defined. The flexible design framework employed hinders a comprehensive understanding of the likely significant impacts, and the reliance on unspecified mitigation measures precludes a proper evaluation of their effectiveness. Consequently, the documentation fails to provide a complete or informed overview of potential environmental, cultural, or community consequences, making assertions of negligible or non-significant effects unsubstantiated by strong evidence.

Additionally, there are substantial conflicts with existing policies. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment framework, and the National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to preserve biodiversity, safeguard climate interests, or maintain environmental integrity. These discrepancies are critical as they directly impact the statutory tests necessary for granting consent and compromise the ability of the relevant authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposed wind farm, with large turbines set in close proximity to the shoreline, raises significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, the dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight 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 is fundamentally flawed and fails to deliver a complete, transparent, or dependable overview of the potential environmental consequences of the proposal. The application's reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty obstructs the application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. As a result, the impacts outlined may not accurately represent the development that is ultimately realised, leaving both the public and the competent authority unable to grasp the true extent of the environmental effects.

Consent is being requested based on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. This approach precludes any meaningful evaluation of effectiveness or assessment of residual impacts, as it defers critical information to post-consent stages. Such a deferral is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and their mitigations are clearly established before any determination.

Moreover, there are substantial evidential deficiencies, including inadequate baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These gaps generate uncertainty regarding the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without sufficient supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, 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, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report untrustworthy and incomplete. These shortcomings inhibit a lawful and robust assessment of environmental effects, thereby leaving the competent authority unable to make a determination based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which is a critical requirement of the Environmental Impact Assessment regime. Instead of

offering a reasoned comparison of feasible alternatives based on their environmental impacts, the application merely outlines the project's development narrative. This methodology does not sufficiently demonstrate that less harmful alternatives have been identified, assessed, and chosen over more damaging options.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is lacking in depth and fails to deliver a thorough understanding of ecological receptors in the West Lewis coastal area. This marine environment is known to be sensitive and biologically rich. However, the baseline data is incomplete, and the methods used do not adequately document species presence, behaviour, and habitat usage. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant gap pertains to otters, which are classified as a European Protected Species. The application does not sufficiently recognise or assess their use of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an inadequate evaluation of the impacts of

construction disturbance, noise, and increased activity. This flaw undermines the findings regarding the absence of significant effects on this species.

There are also shortcomings in the assessment of basking sharks, as the reliance on aerial surveys introduces major detection bias, especially under Atlantic conditions. This method likely underrepresents their presence, in contrast to established land-based observations that show frequent usage of these waters. Not considering such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that any assertions of negligible or non-significant effects are grounded in assumptions rather than strong evidence. The lack of adequate baseline data also obstructs a meaningful evaluation of cumulative and indirect impacts, which include seasonal changes and broader ecosystem interactions. This raises uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment framework and National Planning Framework 4. Protected species have not been correctly identified or assessed. The uncertainty created prevents the dismissal of adverse effects beyond reasonable scientific doubt, which necessitates adherence to the precautionary principle. Thus, in these circumstances, consent cannot be granted legally.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, exhibiting serious gaps in evidence and notable internal inconsistencies. The west coast of the Isle of Lewis is home to internationally significant seabird populations that are already declining. However, the application fails to provide the necessary evidential standard to prove that these species will not be adversely affected by the proposed development. Situated within crucial foraging areas and migratory routes, the assessment inadequately evaluates the potential consequences of displacement, collision risk, and habitat loss.

A key contradiction arises within the application, as the developer asserts there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This contradiction casts doubt on the assessment's reliability and suggests that its conclusions are not substantiated by the evidence presented.

Moreover, the assessment lacks sufficient evidence regarding the impacts on seabirds

linked to protected sites such as the Lewis Peatlands and St Kilda. It inadequately acknowledges the significance of these feeding grounds, and its reliance on modelling methods generates uncertainty, particularly for species facing severe decline, including Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of comprehensive understanding of behavioural responses.

The proposed turbine siting within a recognised migratory corridor adds another significant risk, effectively erecting a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently explore the long-term ramifications of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to affirm that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and limitations in modelling, means the standard of proof beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, precluding a lawful conclusion in favour of consent.

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

Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding its social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, but the complete 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 fully grasp 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, and these impacts stem from direct community engagement rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is impossible, thereby limiting the capacity to evaluate their significance in the decision-making process.

The application is also seen as a potential threat to community identity and cohesion,

with “cultural loss” being highlighted in the developer’s findings. Despite this recognition, these impacts have not been adequately addressed in the main application, nor have they been given the necessary weight. The withholding of the full Social Impact Assessment obscures the true human and social cost associated with the development.

Furthermore, this lack of transparency has serious implications for the Environmental Impact Assessment process. It is crucial to have a complete understanding of social, economic, and health impacts for developments of this magnitude, especially when community character and functioning could be jeopardised. By failing to provide the full dataset, the application lacks a comprehensive evidential basis to assess the balance of 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 essential that development promotes positive health outcomes and mitigates harm; however, the evidence at hand suggests existing adverse effects that have not been fully disclosed. The absence of the complete assessment renders compliance with this policy unprovable.

The procedural implications of this situation are significant. Without access to the full Social Impact Assessment, the competent authority is unable to conduct a thorough socio-economic and health evaluation. This omission is material and represents a failure to meet the evidential requirements outlined in the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, alongside the documented existing adverse effects, results in an incomplete and unreliable evaluation. 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 regarding seascape, landscape, and visual impacts is significantly lacking and does not capture the extent of change or the sensitivity of the environment. The coastline of West Lewis features an open Atlantic horizon and maintains an undeveloped character, providing a strong sense of remoteness. Introducing large-scale turbines near the shoreline would establish a continuous and prominent industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

The application inadequately addresses the extent of the visual change. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would impact visual amenity directly and diminish the qualities of naturalness and remoteness. The assessment fails to adequately reflect this impact or its importance in the context of such a sensitive landscape.

Concerns exist regarding how visual viewpoints were selected and presented. It appears that the chosen viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the true extent of visual impact has been underestimated, which weakens the reliability of the assessment.

Another key shortcoming is the failure to evaluate the interconnected nature of landscape, seascape, and cultural heritage. Significant 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 as separate entities instead of recognising their interdependence, resulting in an inadequate assessment of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This represents a visual impact as well as a broader cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which concerns the protection of natural areas and historical assets. The extent of the proposed changes is not compatible 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 questions any assertion of policy compliance.

Moreover, it is evident that the impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be dominant and inevitable. Consequently, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

In conclusion, the assessment does not accurately portray 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 conflicts with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is lacking. It does not provide enough detail to understand the likely environmental effects. The proposal includes significant seabed preparation and installation works in a high-energy Atlantic environment, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures to be created after consent, which hinders any proper evaluation of their adequacy or effectiveness.

This dependence on unspecified future measures raises concerns, especially given the

sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. While the application acknowledges the risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to offer sufficient information on how these risks will be prevented, controlled, or monitored.

There is uncertainty about the size and behaviour of sediment plumes caused by seabed disturbance and cable installation. Without reliable modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application limits the ability to evaluate whether adequate measures are in place to respond to pollution events. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent is granted, and without this information, a lawful determination cannot be achieved. The application also does not show compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts make the assessment materially inadequate. These deficiencies obstruct a thorough evaluation of construction and pollution risks and strengthen the view that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant shortcomings in its assessment of fisheries and marine life, which fails to offer a thorough evaluation of both ecological and socio-economic impacts. It has been established that the waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these crucial uses and habitats can be preserved or maintained without considerable disruption.

A notable concern lies in the assumption that fishing activities can be displaced without negative repercussions. The application lacks evidence to support the claim that alternative fishing grounds are both available and capable of withstanding additional pressure. This gap in information is critical, as such displacement could lead to overfishing in other areas and may have broader economic implications for the local fishing fleet. The absence of a clear, evidence-based assessment means that the

potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses significant risks to marine species, especially through the underwater noise generated during construction activities. The anticipated high-energy hammer piling, conducted over an extended duration, is expected to disturb marine life over large distances, particularly affecting species like dolphins. The predicted disruption to a substantial portion of the local bottlenose dolphin population raises grave concerns, yet the application seems to downplay the significance of these potential effects, lacking sufficient evidence to support such minimisation.

There is also a striking inconsistency within the application, as it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction raises doubts about the credibility of the assessment and raises alarm over compliance with the Habitats Regulations, particularly concerning anticipated harm that would require legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, thus undermining any conclusion that the proposal constitutes sustainable development.

In summary, the deficiencies concerning evidence on fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies render the assessment incomplete and unreliable. These flaws ultimately inhibit a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a range of significant risks and gaps that undermine its reliability and legality. The routing of infrastructure through active croft land raises concerns over potential conflicts with existing land use and legal rights. There is insufficient evidence provided to demonstrate that the necessary consents or processes have been initiated, which calls into question the deliverability and lawful implementation of the project.

The proposal also fails to adequately address the critical issue of carbon balance. Disturbances to peatland release stored carbon, leading to a carbon debt that could contradict the aims of renewable energy development. Without demonstrating that the overall carbon balance remains beneficial, the application lacks a crucial component

necessary for a proper assessment.

Moreover, there are serious implications for sensitive habitats such as machair systems and peatland environments that are afforded policy protection. The application does not show that these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, indicating a clear evidential gap regarding biodiversity protection.

The assessment of onshore infrastructure is fundamentally flawed and incomplete, failing to consider the interconnected nature of the offshore turbines and onshore works. This fragmented approach obscures the true scale of environmental and socio-economic effects that arise from what is a single integrated project. The onshore components, including cabling across protected moorland and the construction of a substation near Stornoway, involve excavation in areas of deep peat, particularly within Barvas Moor, which is a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts hinders a full understanding of the project's overall environmental footprint.

Additionally, the separation of offshore and onshore elements prevents the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are considered together. However, by treating them separately, the combined impacts on peatlands, habitats, and communities remain inadequately understood.

From a policy standpoint, the failure to evaluate the project as a whole and demonstrate protection for peatlands, habitats, and land use interests is 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 application's validity. Collectively, these factors render this part of the application incomplete and unreliable, obstructing a lawful determination.

TOURISM

The assessment of tourism impacts in the application is inadequate and overlooks the economic and social effects on a vital part of the Isle of Lewis economy. Tourism is heavily reliant on the island's natural features, such as its wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no analysis provided to quantify how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution from tourism.

The economic significance of tourism is notable, with growth from £65 million in 2017 to over £81.5 million, alongside the support of more than 1,000 jobs, representing up to 16% of the island's economy. However, the application fails to forecast the potential effects of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without this evaluation, it remains unclear if the development would yield a net economic

advantage or disrupt a well-established and expanding sector.

Additionally, the assessment does not address the significance of environmental quality for tourism. This includes the crucial role of unspoiled landscapes and dark skies in enhancing visitor experiences, as well as the emerging markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, leaving a critical gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a community like this island, which has limited economic diversification, the neglect to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment means that these economic risks have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

From a policy viewpoint, the application does not meet the standards of the National Planning Framework 4, especially concerning economic impact and the necessity to demonstrate net benefit. It is at odds with strategic goals that recognise tourism as a priority growth area and fails to provide enough evidence for the competent authority to evaluate the economic effects of the proposal.

In conclusion, the combination of the lack of quantification of tourism impacts, the failure to assess the environmental factors influencing visitor behaviour, and the oversight of the island's economic reliance on tourism leads to a significant evidential gap. This gap hinders a thorough assessment of the economic repercussions and indicates 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.

Additional Comments

I am deeply concerned about the N4 development. I feel the Outer Hebrides are one of the very few still wild areas of the UK and even Europe, with many MPA's and SSI's. We have spectacular land and sea scapes with abundant wildlife, some that thrive here despite struggling in other areas. I do not understand how this can be considered a suitable area for this huge industrial development and do not feel the impact has been properly/independently researched.

I do believe we need to find an alternative to oil and greener ways of producing energy, however, I don't believe this is a greener alternative. How much carbon will be released when thousands of tons of peat are dug to lay the transmission lines across Lewis and the Highlands? Peatland now being protected in many areas because of it's ability to store carbon. How much steel and concrete will be used to produce these mega

turbines and all the associated infrastructure? In reality how many years will N4 have to run to even get back to net zero?

I am concerned about the effect on the local population too. Most people employed to build the infrastructure will not be locals, plus these jobs will only be short term. But it will have a seriously detrimental effect on many incomes, I do not believe people want to come on holiday to see and hear the largest turbines in Europe. Personally I have two jobs that both rely on tourism. I cannot see any benefit for the island, not even my electric bills will reduce.

I am in favour of small scale community wind farms, these have been proven to give back to the local economy, and I feel power should be produced nearby where it's needed with any excess feeding into the grid. If big cities need more power why not put solar panels on industrial buildings, don't spoil un-spoilt areas hundreds of miles away.

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: B0D601C1

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing notable deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns about the scale, proximity, and design of the project cast doubt on its adherence to statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. Furthermore, the flexible design framework employed creates ambiguity regarding potential significant effects. The reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation falls short of providing a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

There exist clear and substantial conflicts with policy. The proposal demonstrates inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to establish that national obligations aimed at safeguarding biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts directly challenge the statutory tests necessary for consent and compromise the ability of the competent authority to ascertain the development's acceptability from a policy standpoint.

The scale of this proposal is unprecedented for the area, with large turbines positioned dangerously close to the shoreline. This raises significant issues 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 highlights the application's incompleteness and its inability to facilitate a lawful determination. In light of these considerations, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, which is a fundamental requirement of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of viable alternatives based on environmental impacts, it merely recounts the project's development. This method does not sufficiently prove that less harmful options have been properly identified,

assessed, and chosen over more damaging ones.

There is no clear or transparent comparison of potential offshore locations, scales of development, or design configurations. Notably, the proposal fails to show that the developer has adequately considered placing turbines further offshore, where there would likely be reduced visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the critical nature of proximity to the shore in evaluating impact, highlights the necessity of such analysis. The lack of this examination means there is no assurance that the proposed siting is indeed the least damaging alternative.

The issues extend to cable routing and landfall assessments, revealing a lack of evidence that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis suggest that the application has not incorporated mitigation by design, instead relying on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, which hampers the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives. In the absence of a thorough alternatives assessment, it cannot be determined that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission, contributing to the conclusion that the application has not undergone adequate evaluation and cannot be lawfully determined.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is significantly flawed, particularly in its failure to recognise the West Lewis coastline as a dynamic cultural landscape wherein environment, tradition, language, and community are interconnected. Rather than appreciating heritage for its evolving social, cultural, and spiritual significance within the community, the application adopts a simplistic view, perceiving it as a collection of unchanging, isolated assets.

An important shortcoming relates to the treatment of culturally significant sites, including the cemeteries at Bragar, Dalmore, and Barvas. These sites serve as active locations for burial and spiritual practices, yet they are erroneously classified as static features. This oversight neglects their ongoing usage and meaning, as well as the potential impact of development on their surroundings. Such misrepresentation leads to an incomplete assessment of cultural consequences and overlooks their vital role in community life.

Additionally, the assessment inadequately addresses intangible aspects of cultural heritage, such as the Gaelic language and the longstanding connection between the coastal community and its environment. These elements are crucial to the area's identity but are notably absent from the evaluation, which constitutes a significant oversight. The cultural ramifications of the proposed development cannot be fully comprehended without these considerations.

There are also substantial concerns surrounding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity aligned with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the assessment's legitimacy and neglects established principles of public participation in decisions that affect cultural and environmental matters.

A further procedural issue is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment impedes the competent authority's ability to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination unfeasible.

From a policy standpoint, these shortcomings directly contravene National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The failure to recognise both tangible and intangible heritage, alongside a disregard for living cultural practices, constitutes a clear deviation from established policy requirements.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and adherence to statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application lacking a sufficient foundation for assessing the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment significantly undermines the transparency necessary for a lawful evaluation of the proposed development. Although the developer engaged local residents through focus groups as part of the Social Impact Assessment, the absence of the complete report creates a substantial evidential gap. This gap hinders both public understanding and the competent authority's ability to assess the social risks identified through the developer's own research.

Available summaries reveal that residents are currently experiencing measurable levels of stress, anxiety, and concern regarding the scale and proximity of the proposal. These impacts are based on direct engagement, thus are not speculative. However, without access to the full assessment, there is an impediment to scrutinising the findings

thoroughly, which in turn restricts the ability to evaluate their significance within the decision-making framework.

Furthermore, the proposal is seen as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite these implications, they have not been adequately addressed within the main application or given the necessary weight in the evaluation process. The retention of the full Social Impact Assessment clouds the true human and social costs associated with the development.

This lack of transparency not only affects the Social Impact Assessment but also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functionality are at stake. The failure to provide the complete dataset means that the application does not offer a full evidential basis to assess the balance of benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are required to foster positive health outcomes and mitigate harm, yet the existing evidence indicates adverse effects that have not been fully acknowledged. Without the full assessment, compliance with this policy cannot be verified.

The procedural ramifications are notable. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the unavailability of the complete Social Impact Assessment. This deficiency constitutes a material omission in the application, failing to satisfy the evidential obligations of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the complete Social Impact Assessment, combined with the documented evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reaffirms the conclusion that the application lacks sufficient supporting information.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. The proposal entails significant seabed preparation and installation activities within a high-energy Atlantic environment, yet the assessment of construction and pollution risks is notably inadequate. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided, resulting in a reliance on mitigation and contingency measures that are to be formulated after consent. This reliance raises serious concerns, as it hampers any meaningful evaluation of their adequacy or effectiveness.

The application acknowledges potential risks, such as sediment mobilisation and

accidental chemical or oil spills, but fails to offer sufficient detail on prevention, control, or monitoring strategies. Additionally, there is ambiguity concerning the scale and behaviour of sediment plumes generated from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty extends to the marine species and habitats that have already been identified as sensitive within the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the assessment of whether suitable safeguards exist to address pollution events. This not only introduces procedural risk but also undermines the ability of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigations must be evaluated prior to granting consent, and the absence of critical information renders a lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines and the associated onshore infrastructure fails to comprehensively address the impacts of what constitutes a single integrated project. These elements are inherently connected; however, they are treated separately in the assessment, leading to a fragmented analysis that obscures the overall environmental and socio-economic implications.

Key components of the onshore work involve cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Notably, these activities include excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The current application does not present a thorough evaluation of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By not adequately assessing onshore impacts, the application limits the ability to evaluate cumulative effects. The Environmental Impact Assessment process necessitates that all project elements are examined collectively; yet, the disconnection

between the offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain unclear.

There are substantial risks to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application falls short of proving that the impacts on these habitats have been thoroughly examined or that appropriate avoidance measures are in place. This creates a significant gap in the evidence concerning biodiversity protection.

Concerns also arise regarding the carbon balance, as the disturbance of peatland releases stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy initiatives. The current application does not sufficiently tackle this matter or demonstrate that the overall carbon balance is advantageous.

Moreover, the proposed routing of infrastructure through active croft land poses potential conflicts with existing land uses and legal rights. The application does not provide sufficient evidence that the required consents or processes have been initiated, which raises doubts about the project's deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment. The existing assessment fails to address dark skies and nocturnal wildlife, which represents a material omission within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are integral to environmental quality, cultural identity, and tourism value.

There is also a significant lack of evaluation regarding the impact of this lighting on visual amenity, landscape character, and the experience of both residents and visitors. The importance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism highlights the seriousness of this omission. The failure to consider these impacts results in a considerable gap in the overall landscape and environmental assessment.

Moreover, the application does not assess how the proposed lighting may impact

nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototaxis, which can lead to disorientation and an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that there has been no evaluation of how aviation lighting could affect these species or contribute to increased mortality rates.

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

Without a thorough assessment of nocturnal impacts, it is not feasible to determine whether protected species or designated sites would experience adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, thereby engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, the absence of this assessment conflicts with National Planning Framework 4, particularly regarding the protection of natural places and environmental quality. Additionally, it undermines the broader evaluation of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the overall environment.

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

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 am strongly opposed to this development. The Western Isles are a unique environment that I feel needs to be protected from industrialization.

The influx of the workforce to complete the project is unsustainable. The islands lack the facilities and amenities, and the damage to our fragile ecology will be irreversible. I also object to the cost of the project. I think it should be located onshore on part of the vast tracts of unused and uninhabited land closer to the central belt, where there is the most requirement for electricity. This will reduce the. Build cost and increase the efficiency of power transfer.

There will be no real benefit for the Western Isles except for some token financial

gesture. Our locally owned turbines provide excellent benefits for many people who live in their catchment area. This massive development will come nowhere near compensating for its overall impact.

Please do not go ahead with the development.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 48ECC3F0

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

Dear Sir/Madam

I would formally like to register my 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 Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive, transparent, and reliable evaluation of the potential environmental impacts of the proposal. The incorporation of a flexible Project Design Envelope, which

does not commit to particular turbine sizes, arrangements, or configurations, introduces a substantial level of uncertainty. This approach hampers the ability to apply a consistent worst-case scenario, thereby compromising the assessment's integrity. Consequently, the impacts outlined may not accurately represent the final development, leaving both the public and the competent authority without a clear understanding of the actual environmental consequences.

The application places excessive reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be rectified later prevents a meaningful assessment of the effectiveness of these measures or the evaluation of residual impacts. Deferring critical information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies be clearly defined before any determination is made.

Furthermore, there are considerable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the scale and significance of potential impacts, especially when conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot meet statutory requirements.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species demonstrates significant deficiencies, failing to offer a thorough or dependable understanding of the ecological receptors within the West Lewis coastal environment. This region is a highly sensitive and biologically active marine system, yet the baseline data provided is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

A critical gap is evident in the evaluation of otters, a species protected under European law, as the application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently evaluated. This deficiency undermines any assertions regarding the absence of significant effects on this species.

Further inadequacies are present in the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This approach likely underestimates the presence of these sharks, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to properly consider such data leads to an incomplete baseline, undermining the reliability of the conclusions drawn.

These methodological shortcomings imply that any conclusions of negligible or non-significant effects are rooted in 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 creates uncertainty regarding the actual scale of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment pertaining to the proposed development is fundamentally unreliable, featuring significant internal inconsistencies and gaps in evidence that severely undermine its conclusions. This development is situated in critical foraging areas and migratory pathways along the west coast of the Isle of Lewis, which is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will remain unaffected, failing to meet the evidential standard required for such assertions.

Moreover, there exists a stark contradiction within the application, wherein the

developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency calls into question the trustworthiness of the assessment, highlighting that the conclusions drawn are not substantiated by the available evidence. The assessment fails to provide robust proof that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will not suffer negative impacts. The critical nature of these feeding grounds has not been thoroughly addressed, and the reliance on modelling approaches creates uncertainty, particularly for species that are facing severe declines, such as Kittiwakes and Fulmars. Furthermore, the methodologies employed are likely to underestimate potential mortality, especially in contexts where baseline data is lacking and the behavioural responses of species are inadequately understood.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively establishing a barrier in a primary flight path for species 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 effects on species with limited global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, in conjunction with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This activates the precautionary principle and obstructs a lawful conclusion supporting consent.

Additionally, the deficiencies observed illustrate non-compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to conclusively demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to internal contradictions, methodological shortcomings, and insufficient evidence. These failings hinder a thorough evaluation of impacts and collectively contribute to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage surrounding the West Lewis coastline is profoundly lacking. This area is a living cultural landscape, where the connections between environment, tradition, language, and community are deeply intertwined. The application reduces heritage to mere static assets, neglecting their dynamic social, cultural, and spiritual roles within the community.

Significant shortcomings are evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites

for burial and spiritual practices, yet the assessment describes them as static features, overlooking their ongoing significance and the effects of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural impacts and ignores their relevance to community life.

Moreover, the assessment fails to account for intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and its coastal environment. These elements are vital to the area's identity, yet they are completely omitted from the assessment, which represents a major shortfall. Without addressing these aspects, the real cultural impact of the development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity and is recognised as an Indigenous People, but there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the assessment's legitimacy and does not adhere to established participation principles regarding decisions that affect cultural and environmental interests.

A fundamental procedural flaw is the failure to conduct a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot legally assess the social, cultural, and economic implications for the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these gaps contradict the National Planning Framework 4, particularly concerning the safeguarding of historic assets and sites. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a clear deviation from policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not offer a solid foundation for understanding the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally flawed, lacking an adequate representation of the scale of change and the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and significant sense of remoteness. The close proximity of large-scale turbines to the shoreline would introduce a continuous and overwhelming industrial presence, fundamentally altering this character and resulting in a permanent and irreversible change to the landscape.

Moreover, the application fails to represent the magnitude of the anticipated visual

alterations. The height and closeness of the turbines would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This would detrimentally affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately convey this impact or its importance within the context of such a sensitive landscape.

Concerns arise concerning the methodology employed in selecting and presenting visual viewpoints. There is evidence indicating that these viewpoints may not adequately reflect the most sensitive receptors or the most adverse scenarios, particularly in relation to significant cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been underestimated, thereby compromising the assessment's reliability.

Additionally, there is a notable shortcoming in the assessment's failure to acknowledge the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these as separate entities rather than understanding their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their link to the natural horizon. This signifies not merely a visual impact but also a wider cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the safeguarding of natural environments and historic assets. The proposed scale of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be successfully mitigated. Given the size, height, and proximity of the turbines, their presence would be overpowering and inescapable. Consequently, the resulting transformation is not merely capable of being reduced to an acceptable level through mitigation; it is fundamentally and permanently altering the landscape.

Overall, the assessment fails to accurately depict the extent of impact, the sensitivity of the environment, and the interconnected relationships between 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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm reflects a significant failure to meet the requirements for sustainable development as dictated by statutory duties, national policy, and evidential standards. It echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite now being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in several key areas.

There are serious deficiencies in the evidence provided for assessment. The proposal lacks a comprehensive and reliable evidential basis, with critical gaps in baseline data and the use of an undefined design envelope. It relies on unspecified mitigation measures and neglects to address important impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of the likely significant effects or any residual impacts.

Moreover, there are notable procedural shortcomings. The omission of a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment represents a significant oversight. These inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

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

Environmental risks remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and at times internally inconsistent. The evidential standard needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision.

Therefore, it is imperative that the competent authority either denies consent based on these grounds or exercises the appropriate regulatory measures to require the submission of the necessary missing information. I urge you to refuse this 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: C6CFA79C

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies related to planning, environmental considerations, cultural implications, and procedural adherence. The development is set to be located off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine natural environment, and rich cultural heritage. Concerns arise regarding the scale, proximity, and design of the wind farm, which raise fundamental questions about its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks an adequate evidential foundation for a lawful determination. Critical environmental data is absent, baseline information is both limited and inconsistent, and numerous aspects of the proposal are left undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures means that their effectiveness remains unassessed. Consequently, the documentation falls short of providing a comprehensive or informed perspective on the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsupported by robust evidence.

Moreover, there are evident and substantive policy inconsistencies. The proposal appears to conflict with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It fails to establish that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These inconsistencies directly challenge the statutory tests necessary for consent and jeopardise the ability of the relevant authority to determine that the development aligns with policy criteria.

The scale of the project is unprecedented for this area, with large turbines to be located in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual impact, and environmental ramifications. Collectively, the lack of adequate information, the reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential detail and fails to provide a full and reliable account of the potential environmental consequences of the proposal. There are significant evidential deficiencies, including gaps in baseline data and a reliance on assumptions rather than site-specific evidence. Such shortcomings lead to uncertainty about the scale and significance of impacts, particularly in cases where negligible or non-significant effects are suggested without robust supporting data. This lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that conflicts with statutory requirements.

Moreover, the application's heavy reliance on mitigation measures, monitoring strategies, and management plans that are yet to be defined is troubling. Seeking consent on the basis that environmental harm will be addressed later prevents any meaningful evaluation of the effectiveness of these measures and obstructs the assessment of residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established before any determination.

The undefined Project Design Envelope compounds these issues by introducing uncertainty regarding specific turbine dimensions, layouts, and configurations. This lack of commitment prevents a consistent application of a worst-case scenario, undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the final development, hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Together, these factors mean that the application does not satisfy the evidential threshold mandated 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 comply with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been fully assessed or appropriate safeguards established.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development lacks a credible assessment of marine ecology and protected species, which is essential for understanding the ecological receptors in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is insufficient. The methodologies used in the assessment fail to accurately identify and evaluate the presence, behaviour, and

habitat usage of key species, leading to a weak evidential basis for impact evaluation.

Particularly concerning is the omission of otters, which are classified as a European Protected Species. The application does not adequately address their foraging and movement within coastal regions. Without a proper assessment of their core foraging range and behavioural patterns, the potential impacts from construction disturbance, noise, and increased activity are not sufficiently considered. This oversight severely undermines the conclusions drawn regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks exhibits significant deficiencies, as it relies heavily on aerial surveys that introduce bias, especially under Atlantic conditions. This method is likely to underestimate their presence when compared with established land-based observations that indicate their frequent use of these waters. The neglect to include or adequately consider this data further compounds the incomplete baseline, diminishing the reliability of the conclusions reached.

The methodological shortcomings mean that any assertions of negligible or non-significant effects rely more on assumptions than on solid evidence. The lack of adequate baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leads to uncertainty concerning the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as the necessary identification and assessment of protected species have not been conducted. The resulting uncertainty means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

Ultimately, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions makes the assessment unreliable. These significant deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application does not rest on a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development includes the siting of turbines within key foraging areas and a recognized migratory corridor on the west coast of the Isle of Lewis, which supports internationally important seabird populations. These populations are already experiencing declines, yet the ornithological assessment provided fails to demonstrate adequately that they will not be adversely affected. The assessment lacks sufficient evidence regarding the impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The methodologies employed introduce significant uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline.

A fundamental contradiction arises within the application itself, as the developer claims there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, a process required when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that its conclusions are unsupported by the evidence presented. The siting of turbines within a primary flight path poses an additional significant risk, creating a barrier for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed.

From a regulatory standpoint, the application does not meet the evidential threshold to conclude no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, obstructing any lawful conclusion in favour of consent. Moreover, the identified deficiencies indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and safeguarding natural assets. The proposal's inability to demonstrate that internationally important seabird populations will remain unaffected directly conflicts with national policy.

Overall, the assessment's internal inconsistencies, methodological flaws, and inadequate evidence render it unreliable. These shortcomings prevent a thorough evaluation of the impacts and lead to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally lacking, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community intertwine. The application employs a narrow perspective, treating heritage merely as a collection of static features instead of recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the assessment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual activities, yet they are regarded as unchanging elements, neglecting their continued significance and the implications of development on their surroundings. This misrepresentation leads to an inadequate understanding of cultural impacts and dismisses their importance in community life.

Moreover, the assessment disregards intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity but are conspicuously absent from the evaluation, representing a critical gap. Without acknowledging these factors, the true cultural implications of the proposed development remain obscured.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking community has a distinct cultural identity, characterised as an Indigenous People, yet the necessary process of Free, Prior and Informed Consent has not been undertaken. This lack of genuine engagement compromises the credibility of the assessment and fails to align with established principles concerning participation in decisions that affect cultural and environmental matters.

Another major oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This evaluation is essential for the competent authority to legally assess the social, cultural, and economic repercussions on the island community. Its absence alone prevents a lawful consideration of the proposal.

From a policy standpoint, these inadequacies place the development in direct opposition to the National Planning Framework 4, especially regarding the preservation of historic assets and sites. The failure to account for both tangible and intangible heritage, as well as to recognise active cultural practices, signifies a blatant disregard for policy stipulations.

Overall, the neglect to evaluate living heritage, intangible cultural values, community rights, and compliance with statutory obligations results in a substantial evidential void. The cultural repercussions of the development have not been adequately examined, leaving the application without a sufficient foundation for assessing the genuine cultural consequences of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment raises serious concerns regarding its adequacy and legality. Although the developer engaged local residents through focus groups, the comprehensive report remains unpublished, creating a significant evidential gap. This omission obstructs the public and the competent authority from grasping the full scope of social risks highlighted by the developer's own research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts stem from actual engagement rather than speculation. However, without access to the complete assessment, the ability to scrutinise these findings is severely limited, thereby hindering the determination of their relevance within the decision-making process.

Furthermore, there is indication that the proposal is viewed as a direct threat to community identity and cohesion, with findings of "cultural loss" emerging from the developer's own investigations. Yet, these social impacts have not been adequately addressed in the main application, nor have they been afforded the necessary consideration. The withholding of the entire Social Impact Assessment conceals the genuine human and social cost associated with the development.

This situation critically undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functionality are potentially affected. By failing to disclose the complete dataset, the application lacks a comprehensive evidential foundation for weighing benefits against harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and avoid negative impacts, yet the available evidence indicates existing adverse effects that have not been transparently reported. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural ramifications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a critical omission within the application and demonstrates a failure to meet the evidential standards of the Environmental Impact Assessment framework.

Ultimately, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing negative impacts, leads to an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the potential impacts on the seascape, landscape, and visual environment is significantly lacking and does not reflect the true scale of change nor the sensitivity of the area affected. The character of the West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to adequately depict the extent of the anticipated visual changes. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not sufficiently illustrate this impact or its significance within the context of such a sensitive landscape.

Concerns also arise from the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the

true magnitude of the visual impact has been underestimated, casting doubt on the reliability of the assessment.

A critical shortcoming is the lack of analysis regarding the interconnected relationship between the landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting connected visually and spatially to the Atlantic horizon. The assessment fails to acknowledge their interdependence, treating these heritage sites as isolated entities, which results in an incomplete assessment of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This represents a visual impact along with broader cultural and spatial damage that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts the principles outlined in National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The extent of change posed by the project is incompatible with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further undermines any assertion of policy conformity.

It is evident that the impacts identified cannot be suitably mitigated. Due to the scale, height, and proximity of the turbines, their presence would be prominent and unavoidable. Thus, the resulting change is fundamental and permanent, incapable of being diminished to an acceptable level through any form of mitigation.

Collectively, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings obstruct a reliable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is severely lacking, providing insufficient detail to evaluate the likely environmental effects. There is a significant degree of seabed preparation and installation work planned within a high-energy Atlantic environment. However, there are no developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures that are slated to be prepared after consent is granted, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on vague future measures raises serious concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk of sediment disturbance and

contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures only exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate safeguards are available to address potential pollution events. This adds procedural risk and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is critical that likely significant effects and mitigation strategies are assessed before consent is granted. The absence of this information means that a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with relevant policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation regarding fisheries and marine life is inadequate, lacking a thorough analysis of both ecological and socio-economic effects. The coastal waters off West Lewis are home to a rich marine ecosystem as well as a vibrant fishing industry, yet the application does not adequately ensure the safeguarding or preservation of these activities and habitats from significant disruption.

A critical concern arises from the presumption that fishing activities can be relocated without repercussions. The application fails to furnish evidence demonstrating the availability, accessibility, or capacity of alternative fishing grounds to absorb increased pressure. This gap is crucial, as such displacement poses a risk of overfishing in other areas and could lead to broader economic ramifications for the local fishing fleet. Without a detailed and evidence-based assessment, the implications for both fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to underwater noise produced during construction activities. The use of high-energy hammer piling over prolonged durations is anticipated to disturb marine life over extensive distances, impacting species such as dolphins. The forecasted disruption to a notable segment of the local bottlenose dolphin population raises serious issues, yet the application minimizes the significance of these impacts without adequate supporting evidence.

There exists an apparent contradiction within the application that acknowledges the necessity of licences to permit harm to European Protected Species while concurrently characterising those impacts as negligible. This inconsistency calls into question the credibility of the assessment and raises compliance issues with the Habitats Regulations, especially in instances where anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to address the cumulative impacts stemming from various pressures, such as habitat disruption, noise pollution, and fishing activity displacement. In the absence of a thorough evaluation of these combined effects, it is impossible to ascertain the overall consequences for marine ecosystems and socio-economic conditions.

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

In conclusion, the combination of insufficient evidence concerning fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment collectively render it incomplete and untrustworthy. These shortcomings hinder a thorough evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

By omitting or delaying the assessment of onshore impacts, the application prevents a

proper evaluation of cumulative effects. The Environmental Impact Assessment process requires all project components to be considered together. The separation of onshore and offshore elements obscures the combined impacts on peatlands, habitats, and local communities.

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

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

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

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

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

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

There are a number of reasons to object to the proposed wind farm. The limited benefits to the local community, the huge affect it will have on the already limited rental properties on the island and the huge environmental impact it'll have on land and at sea. For me. The key consideration for me, is that there are very few places untouched by human interference in the UK. Standing on the west coast of Lewis is one of the few places unchanged for millennia. This development would permanently change this, ruining this unspoilt place for generations to come, for very little benefit to the local community.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: AE2E9568

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise due to the scale and proximity of the turbines, which pose significant questions regarding their compatibility with statutory requirements and national policy, as well as the principles of sustainable development.

The application lacks an adequate evidential basis necessary for a lawful determination. Important environmental data is absent, while baseline information is inconsistent and insufficient, leaving key aspects of the proposal undefined. The use of a flexible design framework obscures the understanding of likely significant effects. Additionally, reliance on unspecified mitigation measures prevents any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There are considerable 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, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate that national requirements for protecting biodiversity, climate interests, and environmental integrity will be met. These inconsistencies directly challenge the statutory tests for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

This proposal's scale is unprecedented in this region, with large turbines being positioned near the shoreline, raising profound concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and inadequate for supporting a lawful determination. In such circumstances, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species presents significant deficiencies, lacking a complete and reliable understanding of ecological receptors in the West Lewis coastal environment. This area is noted for its sensitivity and biological

activity, yet the baseline data is inadequate, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to provide a solid evidential foundation for evaluating potential impacts.

A notable gap is the inadequate consideration of otters, a species protected under European law. The application does not appropriately recognise or assess their active utilisation of coastal regions for foraging and movement. This oversight concerning their core foraging range and behavioural patterns results in an insufficient evaluation of the potential effects from construction disturbances, noise, and increased activity. Such shortcomings call into question the conclusions drawn regarding the lack of significant effects on this species.

Further issues arise with the assessment of basking sharks, where reliance on aerial surveys creates a considerable detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of their presence, particularly in light of established land-based observations that indicate these waters are frequently used. The failure to integrate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

The methodological flaws in the assessment result in conclusions regarding negligible or non-significant effects that are grounded in assumptions rather than robust evidence. The lack of comprehensive baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty surrounding the true extent of risk to marine species and habitats is concerning.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application lacks a comprehensive assessment of community rights and engagement, particularly regarding the Gaelic-speaking population, which embodies characteristics of an Indigenous People. Notably, there has been no process of Free, Prior and Informed Consent conducted, which undermines the legitimacy of the assessment. This absence of meaningful engagement fails to adhere to established

principles concerning participation in decisions that affect cultural and environmental interests.

Furthermore, the evaluation of cultural heritage and community identity is fundamentally inadequate, as it overlooks the West Lewis coastline's status as a living cultural landscape, where environment, language, tradition, and community are intrinsically linked. The assessment adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

An important deficiency is found in 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; however, the assessment incorrectly categorises them as static features, disregarding their continued use, meaning, and the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and neglects their essential role in community life.

The application also fails to consider intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are central to the area's identity but are entirely omitted from the assessment, creating a significant gap. The cultural impact of the development remains unclear without the inclusion of these factors.

Moreover, a critical procedural oversight is evident in the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation 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 at odds with the National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to adequately address both tangible and intangible heritage, along with the neglect of living cultural practices, is a clear deviation from policy requirements.

Collectively, the oversight in assessing 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 fails to establish a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing related to the proposal is insufficient and lacks necessary transparency. While the developer conducted a Social Impact Assessment, including focus groups with local residents, the complete report has not been made public. This results in a significant evidential gap, hindering both

public understanding and the competent authority's ability to evaluate the full extent of social risks identified by the developer's research.

Available summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts arise from direct engagement with the community and are not merely speculative. However, without disclosing the complete assessment, proper scrutiny of the findings is not possible, which limits the capacity to assess their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal threatens community identity and cohesion, with “cultural loss” noted in the developer's findings. Unfortunately, these effects have not been fully considered in the main application or given the appropriate weight they deserve. The decision to withhold the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when the character and functioning of the community may be at stake. By failing to provide the complete dataset, the application does not offer a comprehensive evidential basis for weighing the benefits against the potential harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid causing harm, but the available evidence reveals adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The implications of these procedural shortcomings are serious. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material failure within the application and does not meet the evidential requirements set by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse effects, renders the assessment inadequate and unreliable. This lack of comprehensive information hinders a lawful determination, reinforcing the conclusion that the application does not rest on sufficient evidence.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves infrastructure linked to offshore turbines and onshore works, which are not assessed as a single integrated project. This approach results in a fragmented evaluation that obscures the comprehensive environmental and socio-economic impacts of the development. Onshore components, including cabling across

protected moorland, a substation construction near Stornoway, and the necessary access infrastructure, are significant in their implications, particularly as they involve excavation in deep peat areas like Barvas Moor. This region serves as a critical carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts limits understanding of the project's complete environmental footprint.

Furthermore, by not properly evaluating onshore impacts, the application hinders the assessment of cumulative effects that arise when all project elements are considered together. The Environmental Impact Assessment mandates that both offshore and onshore aspects be viewed in conjunction, yet their separation leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

There are serious risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application fails to establish that all impacts on these areas have been fully assessed or that suitable avoidance measures have been taken. This creates 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 does not present evidence that necessary consents or processes have been initiated, which brings into question the feasibility and legality of the proposal.

From a policy standpoint, the lack of a holistic assessment and the failure to demonstrate adequate protection of peatlands, habitats, and land use interests contradicts 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 the project components, the absence of comprehensive assessment, and the lack of evidence regarding environmental and land use impacts contribute to rendering this aspect of the application incomplete and unreliable, obstructing a lawful determination.

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

I approve of renewable energy in principle but not at a cost to the communities where giant turbines are being sited. It appears that no benefit will accrue to Lewis or even Scotland from this very intrusive development and much may be lost.

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: 83BF6710

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 pertinent marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough examination of the Environmental Impact Assessment Report alongside supplementary documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Situated off the west coast of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, a largely untouched environment, and a strong cultural presence. The proposal's scale, its proximity to the shore, and its design evoke serious concerns regarding adherence to statutory obligations, national policy, and sustainable development principles.

There is a lack of adequate evidence provided for a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and essential components of the proposal remain unspecified. The adoption of a flexible design framework hinders a precise understanding of potential significant effects, while the dependence on unspecified mitigation strategies renders their efficacy unassessable. Consequently, the provided documentation fails to offer a comprehensive understanding of the environmental, cultural, and community impacts involved, and claims suggesting negligible or non-significant effects lack solid supporting evidence.

Substantial conflicts with policy are evident. The proposal appears to diverge from the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural areas, cultural heritage, and public health and wellbeing. It does not sufficiently demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies are critical as they directly relate to the statutory tests necessary for consent and compromise the capability of the competent authority to affirm that the development aligns with policy standards.

The unprecedented scale of this proposal poses additional challenges, with large turbines situated in close proximity to the coastline, raising significant issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policies illustrate that the application is incomplete and cannot facilitate a lawful decision. In light of these factors, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or trustworthy account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking firm commitments to specific turbine dimensions, layouts, or configurations, generates considerable uncertainty. This uncertainty compromises the assessment's integrity and obscures the actual impacts that the development may produce, thereby preventing both the public and the competent authority from grasping the true extent of environmental effects.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a biologically active and sensitive marine system. However, the assessment of marine ecology and protected species lacks completeness and reliability. The data collected is insufficient, and the methods used do not effectively capture the presence, behaviour, and habitat use of species within

this area. Consequently, the assessment fails to provide a solid basis for evaluating potential impacts.

A significant gap in the assessment concerns otters, which are recognised as a European Protected Species. The application does not adequately acknowledge their use of coastal areas for foraging and movement. Without considering their core foraging range and behaviour, the potential impacts of construction disturbances, noise, and increased human activity remain unassessed. This oversight casts doubt on the conclusions drawn regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks suffers from reliance on aerial surveys that introduce a considerable detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show these waters are frequently used. The failure to integrate or properly assess such data results in an incomplete baseline and undermines the reliability of the conclusions.

These methodological shortcomings lead to findings of negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of adequate baseline data hinders the assessment of cumulative and indirect impacts, such as seasonal changes and broader ecosystem interactions. This creates uncertainty about the actual risk to marine species and their habitats.

From a regulatory standpoint, the application does not adhere to the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify and assess protected species. The uncertainty that arises prevents the dismissal of adverse effects with reasonable scientific confidence, which necessitates the application of the precautionary principle. Therefore, consent for the project cannot be lawfully granted.

Overall, the incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application lacks an adequate evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development lacks reliability due to significant internal inconsistencies and methodological weaknesses, leading to insufficient evidence. It fails to meet the necessary evidential standards required to ascertain no adverse effect on the integrity of protected sites. The application contains contradictory conclusions, raising questions about the reliability of its findings. Importantly, the presence of data gaps and limitations in the modelling approaches employed means that the standard of beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle.

The assessment inadequately evaluates the implications of potential displacement,

collision risks, and habitat loss for seabird populations, particularly within key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. Additionally, it does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully recognised, and the reliance on modelling introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, where mortality rates are likely underestimated due to incomplete baseline data and unexamined behavioural responses.

Furthermore, the location of turbines within a recognised migratory corridor raises significant concerns, as it effectively creates a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed, nor have the potential impacts on species with relatively small global populations been thoroughly explored.

From a regulatory standpoint, the proposal fails 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 application in direct conflict with national policy.

In conclusion, the combination of methodological deficiencies, insufficient evidence, and internal inconsistencies renders the ornithological assessment unreliable. These issues prevent a thorough evaluation of the potential impacts, ultimately indicating that the application does not satisfy the statutory requirements necessary for proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage in the application is fundamentally flawed, neglecting to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, traditions, and community are deeply intertwined. The approach taken is overly simplistic, viewing heritage merely as a collection of static assets rather than appreciating their dynamic social, cultural, and spiritual significance within the community.

A significant shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, they are characterised merely as static features in the assessment. This oversight fails to acknowledge their ongoing significance and the implications of development on their surroundings, leading to an incomplete analysis of cultural effects and disregarding their importance in the fabric of community life.

Moreover, the assessment neglects to consider intangible cultural heritage, such as the Gaelic language and local traditions, along with the enduring connection between the

community and the coastal environment. These aspects are vital to the region's identity but are entirely omitted from the analysis, representing a substantial gap. The absence of these considerations means that the cultural implications of the development cannot be fully comprehended.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking population embodies a unique cultural identity with traits recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior, and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles of community participation in decisions that affect their cultural and environmental concerns.

Additionally, there is a critical procedural oversight due to the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligations to assess the social, cultural, and economic impacts on the island community. This alone hinders a lawful determination of the application.

From a policy standpoint, these shortcomings contradict the requirements set forth in National Planning Framework 4, especially regarding the preservation of historical assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices indicate a clear divergence from necessary policy expectations.

In summary, the lack of consideration for living heritage, intangible cultural values, community rights, and statutory responsibilities has resulted in a significant evidential gap. The cultural consequences of the proposed development have not been adequately evaluated, and the application falls short in providing a robust basis for understanding the true cultural cost associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts related to the proposed turbines is fundamentally inadequate, failing to capture the scale of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would establish a persistent industrial presence that would irrevocably alter this character and lead to a permanent transformation of the landscape.

Furthermore, the application does not accurately depict the extent of this visual change. The size and proximity of the turbines would dominate views from local residential areas, historical sites, and popular coastal locations. This would significantly affect visual amenity and undermine the landscape's defining features of naturalness and remoteness. The assessment fails to properly articulate the significance of these impacts within such a sensitive landscape.

There are serious methodological flaws in how visual viewpoints have been selected and presented. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning critical cultural heritage sites and high-value landscapes. This raises concerns that the true magnitude of visual impact has been downplayed, compromising the assessment's reliability.

Additionally, there is a notable failure to consider the interconnectedness between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, linked visually and spatially to the Atlantic horizon. The assessment treats these heritage assets in isolation, ignoring their interdependence, which leads to an incomplete understanding of how the proposal will impact their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are appreciated and severing their ties to the natural horizon. This is not merely a visual issue; it represents a wider cultural and spatial detriment that has not been properly evaluated in the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, which aims to protect natural environments and historical assets. The scale of the proposed change fails to meet the necessity of preserving landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario assessment further undermines any assertion of compliance with policy.

Moreover, it is evident that the impacts noted cannot be effectively mitigated. Given the height, scale, and proximity of the turbines, their presence would be imposing and inescapable. The anticipated changes are therefore fundamental and permanent, rather than amenable to acceptable levels of mitigation.

In summary, the assessment does not accurately reflect the magnitude of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings preclude a dependable evaluation and affirm the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking in detail, failing to provide the necessary information to evaluate potential environmental impacts. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on mitigation and contingency measures that are to be established after consent. This approach inhibits any meaningful assessment of their adequacy or effectiveness.

There is particular concern over this reliance on undefined future measures, especially considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and essential habitats, both of which are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

Moreover, uncertainties exist regarding the scale and behaviour of sediment plumes generated from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty encompasses potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until post-consent, the application obstructs the evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to granting consent, and when such information is absent, a lawful determination cannot be achieved. The application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts results in a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks, further reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the current application does not adequately address the ecological or socio-economic impacts associated with its proposal. It fails to demonstrate how these vital habitats and activities can be preserved without causing significant disruption.

A critical flaw in the assessment is the assumption that fishing activities can simply be moved without any consequences. The application lacks evidence to suggest that alternative fishing grounds are available or that they could sustain the additional pressure resulting from this displacement. This oversight is crucial, as it could lead to overfishing in other areas and have detrimental economic effects on the local fishing fleet. Without a solid evidence base, the potential impacts on fisheries and livelihoods

remain unclear.

The proposal poses considerable risks to marine species, particularly due to the underwater noise created during construction. The use of high-energy hammer piling for extended periods is likely to disturb marine life over significant distances, particularly affecting populations such as dolphins. The anticipated impact on a substantial portion of the local bottlenose dolphin population raises serious issues, yet the application inadequately addresses these concerns, lacking the necessary supporting evidence.

Additionally, there is an evident inconsistency within the application regarding the need for licenses to permit harm to European Protected Species, while simultaneously characterising these impacts as negligible. This contradiction severely undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where expected harm necessitates legal approval.

Moreover, the assessment overlooks cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

The application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This is a significant oversight, especially considering the increasing importance of dark skies to the region's identity and the growth of tourism sectors like astro-tourism. The failure to assess these impacts represents a clear gap in the overall landscape and environmental evaluation.

Furthermore, there is no consideration of how the proposed lighting will affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and raise the risk of collisions. The application lacks any lighting impact assessment or phototaxis study, leaving unaddressed how aviation lighting may influence these species or contribute to increased mortality rates.

This issue is aggravated by the reliance on daytime survey data for the ornithological assessment, which fails to account for nocturnal activities or related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, but this concern has not been examined. The lack of site-specific night-time data results in a critical deficit in understanding the ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse consequences. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions contradict the National Planning Framework 4 regarding the protection of natural areas and environmental quality. They also weaken the overall evaluation of landscape and seascape impacts, as the night-time character is a crucial element of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm reflects a significant failure to meet the requirements for sustainable development as dictated by statutory duties, national policy, and evidential standards. It echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite now being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in several key areas.

There are serious deficiencies in the evidence provided for assessment. The proposal lacks a comprehensive and reliable evidential basis, with critical gaps in baseline data and the use of an undefined design envelope. It relies on unspecified mitigation measures and neglects to address important impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment is incomplete,

failing to provide a clear understanding of the likely significant effects or any residual impacts.

Moreover, there are notable procedural shortcomings. The omission of a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment represents a significant oversight. These inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

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

Environmental risks remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and at times internally inconsistent. The evidential standard needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either denies consent based on these grounds or exercises the appropriate regulatory measures to require the submission of the necessary missing information. It is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

The lack of community engagement before the leasing of N4 is a slap in the face of the people living here. Nor was there any sufficient estimate of the severe impact this will have on protected wildlife and habitats. I should not be surprised, as this is happening in many other places, but this does not make it right. I love this island, its people and the wildlife, and we need to do our utmost to make sure that our energy needs, which I am sure are legitimate, do not come at the cost of losing what makes life so valuable on this beautiful island.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 0AF4D2F9

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

Dear Sir/Madam

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives, which is a critical requirement under the Environmental Impact Assessment regime. Instead of offering a structured comparison of realistic options based on their environmental effects, it provides a narrative account of the project's evolution. This lack of a systematic approach means that less harmful alternatives have not been properly identified or evaluated in favour of more damaging solutions.

There is a significant lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has genuinely considered placing the turbines further offshore, where the potential visual, ecological, and coastal impacts might be diminished. The sensitivity of the West Lewis coastline underscores the importance of proximity to shore in assessing impact, and the absence of a thorough analysis in this regard hinders the ability to ascertain whether the proposed siting is indeed the least damaging option.

Furthermore, the shortcomings extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been explored sufficiently to mitigate impacts on sensitive receptors. This includes significant sites of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that the project has not applied mitigation by design, relying instead on measures intended to be implemented post-design.

As a consequence, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This oversight fails to follow the established mitigation hierarchy and prevents the competent authority from determining whether more suitable and less harmful alternatives are available. Without a thorough assessment of alternatives, one cannot conclude that the proposal is sustainable or compliant with relevant policies.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its impact on the ornithological environment, particularly given that it is situated within key foraging areas and migratory pathways for seabirds. 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 that these species will not be adversely affected. The assessment lacks a thorough evaluation of the implications of displacement, collision risk, and habitat loss, which

are critical factors in understanding the potential impacts on these birds.

There are fundamental contradictions present in the application itself, as the developer asserts no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically warranted only where significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the necessary 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 critical nature of these feeding grounds is not fully acknowledged, and the modelling approaches employed create uncertainties, particularly for species in severe decline such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor poses an additional and significant risk, creating a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately examine the long-term ramifications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with gaps in data and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and precludes a lawful conclusion that could support consent.

Overall, the identified deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable due to internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These shortcomings hinder a comprehensive evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal under consideration presents significant deficiencies in its assessment of cultural heritage and community identity. It fails to recognise the West Lewis coastline as a living cultural landscape, where the environment, language, tradition, and community are interconnected. Instead, the application adopts a reductive perspective, viewing heritage merely as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

A major shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them as static features. This mischaracterisation neglects their continued use and significance, as well as the potential impact of development on their setting. Consequently, this results in an incomplete evaluation of cultural effects and overlooks their essential role in community life.

Furthermore, the application neglects to consider intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the assessment, representing a significant oversight. The lack of consideration for these factors impedes a proper understanding of the cultural impact of the development.

There are also substantial concerns regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity akin to that of Indigenous Peoples, has not undergone a process of Free, Prior and Informed Consent. This absence of meaningful engagement calls into question the legitimacy of the assessment and fails to honour established principles of participation concerning cultural and environmental interests.

Additionally, a critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

competent authority from gaining a comprehensive understanding of the social risks identified in the developer's own research.

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally lacking and does not truly capture the extent of the change or the sensitivity of the environment that will be affected. The character of the West Lewis coastline is defined by its open Atlantic horizon, its undeveloped nature, and a pronounced sense of

remoteness. Should large-scale turbines be introduced near the shoreline, they would create a continuous and overwhelming industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

The application fails to accurately depict the magnitude of this visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations. This dominance would significantly detract from visual amenity and undermine the intrinsic qualities of naturalness and remoteness. There is a concerning inadequacy in the assessment, which does not convey the true level of impact or its importance in a landscape of such sensitivity.

Moreover, there are methodological issues with how visual viewpoints have been selected and presented. Evidence indicates that these viewpoints may not comprehensively represent the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, which undermines the credibility of the assessment.

Another significant shortcoming is the neglect to evaluate the interconnected relationship among landscape, seascape, and cultural heritage. Iconic sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting that is visually and spatially connected to the Atlantic horizon. The assessment treats these sites as isolated features instead of acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these vital relationships, altering how heritage assets are perceived and their connection to the natural horizon. This change represents not only a visual impact but also a more profound cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is fundamentally incompatible with the necessity to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a rigorous worst-case assessment further undermines any assertions of policy compliance.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would make their presence dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, incapable of being 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 interconnected nature of landscape and

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

CONSTRUCTION AND POLLUTION RISKS

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

This reliance on unspecified future measures raises alarm, particularly considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of disturbance and contamination from sediment. While the application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail regarding the prevention, control, or monitoring of these incidents.

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards are in place for responding to pollution incidents. This introduces procedural risks and diminishes the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and appropriate mitigation are assessed prior to granting consent. The absence of such critical information renders a lawful determination impossible. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainties surrounding potential impacts render the assessment materially inadequate. These shortcomings obstruct a thorough evaluation

of construction and pollution risks and reinforce the assertion that the application is incomplete.

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.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents significant shortcomings in meeting the principles of sustainable development when evaluated against national policy, statutory obligations, and evidential benchmarks. This application mirrors the main concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, highlighting unacceptable levels of industrialisation. This current proposal is put forth under a more robust policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and the wellbeing of the community.

The evidential foundation for the application is incomplete and unreliable. There are notable deficiencies in baseline data, an unclear design envelope, unspecified mitigation measures, and key impact pathways that have not been addressed, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment fails to provide a thorough understanding of potential significant effects or residual impacts.

Procedural errors are also evident. The lack of a compliant Island Communities Impact Assessment violates the statutory requirements set out in the Islands (Scotland) Act 2018, while the omission of a complete Social Impact Assessment is a significant flaw. These gaps hinder the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal conflicts with the National Planning Framework 4. It does not adequately ensure the protection of biodiversity, natural sites, and cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. Additionally, it lacks evidence of a net economic benefit, particularly due to the absence of tourism impact assessments. The assessment of cumulative impacts from both offshore and onshore components is inadequate, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also internally inconsistent. The necessary evidential threshold to affirm the absence of adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and thereby precluding a lawful determination that impacts are acceptable.

Additionally, 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, disruptions to cultural and visual connections, and adverse effects on tourism represent permanent changes that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. It is requested that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Additional Comments

The beauty of the unspoilt coastline will be altered. The view from my house will be industrialised. The infrastructure to support the turbines will obtrusive. The locals affected will gain no financial benefit. I can't see any advantages for the indigenous population 🙄.

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: 7339F15F

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment processes. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and its accompanying documents, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The project is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing shoreline, relatively untouched environment, and rich cultural heritage. Concerns have arisen regarding the scale, design, and proximity of the development, raising questions about its alignment with statutory regulations, national policies, and sustainable development principles.

The application fails to establish an adequate evidential foundation necessary for a lawful decision. There is a notable absence of critical environmental data, while the existing baseline information is both limited and inconsistent. Furthermore, several elements of the proposal remain undefined, and the use of a flexible design framework obscures a clear understanding of the likely significant effects. The reliance on unspecified mitigation measures leads to an inability to evaluate their effectiveness. Consequently, the documentation does not provide a comprehensive or informed assessment of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Clear policy inconsistencies are evident, as the proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4. This is particularly concerning with respect to biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national standards aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they pertain to the statutory tests necessary for consent, undermining the competent authority's ability to ascertain the proposal's acceptability within policy parameters.

The unprecedented scale of the proposal raises significant issues, with large turbines proposed in close proximity to the shoreline, which poses serious concerns regarding landscape capacity, visual impact, and overall environmental consequences. When viewed collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy violations indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency to reliably convey the likely environmental effects of the proposed development. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty undermines the assessment's integrity and hinders a consistent application of a worst-case scenario, thereby obscuring the true extent of potential environmental impacts from both the public and the competent authority.

Moreover, the application is heavily dependent on unspecified mitigation measures, monitoring strategies, and management plans, which have yet to be defined. Seeking consent under these circumstances, with the intention to address environmental harm at a later stage, impedes a meaningful evaluation of the effectiveness of these measures and hinders the assessment of any residual impacts. This deferral of critical information to post-consent phases is procedurally improper and contradicts the fundamental purpose 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 shortcomings, such as gaps in baseline data, limitations in the employed methodology, and an overreliance on assumptions rather than site-specific evidence. This situation leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to the National Planning Framework 4, including obligations related to biodiversity protection and environmental integrity, as it cannot be confirmed that impacts have been thoroughly assessed or that adequate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives within the application is significantly deficient and does not satisfy the statutory obligations of the Environmental Impact Assessment regime. Instead of offering a detailed, reasoned comparison of feasible alternatives regarding

their environmental implications, the application merely recounts the development's progression. This methodology fails to establish that less harmful options have been thoroughly identified, evaluated, and favoured over more detrimental solutions.

Moreover, there is an absence of transparent, evidence-based comparisons concerning alternative offshore sites, varying development scales, or design configurations. Notably, the developer has not convincingly explored the possibility of positioning the turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, along with the critical role that proximity to shore plays in assessing impact, the lack of such an analysis obstructs any conclusion that the proposed location is the least damaging alternative.

This inadequacy extends to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately considered to minimise or avoid impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to establish a clear avoidance strategy and the lack of comparative analysis indicate that mitigation by design has not been implemented, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been reduced through site selection, layout, and infrastructure routing. This represents a clear deviation from the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. In the absence of a rigorous assessment of alternatives, it is impossible to determine that the proposal is a sustainable or policy-compliant solution.

From a policy viewpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community well-being. The lack of a systematic and comparative assessment is a significant omission that further reinforces the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, resulting in an incomplete understanding of ecological receptors within the West Lewis coastal environment. This marine system is notably sensitive and biologically active, yet the methodologies employed have not adequately captured essential data regarding species presence, behaviour, and habitat use. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A significant oversight is the failure to appropriately assess otters, which are classified as a European Protected Species. The application does not recognise their active use of coastal areas for foraging and movement, and it inadequately addresses their core foraging range and behavioural patterns. This neglect means the potential effects of

construction disturbance, noise, and increased human activity remain unassessed, undermining any claims regarding the absence of significant effects on this species.

Furthermore, the evaluation of basking sharks suffers from serious deficiencies due to a reliance on aerial surveys, which can introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of the area. The omission of relevant data weakens the integrity of the baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than sound evidence. The lack of sufficient baseline data hampers the ability to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This absence of clarity creates uncertainty regarding the actual risks faced by marine species and their habitats.

From a regulatory standpoint, the application fails to satisfy the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or evaluated. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the invocation of the precautionary principle. Therefore, consent cannot be lawfully granted under these circumstances.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These significant deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and ultimately indicate that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application concerning the potential impacts on ornithological interests is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate, to the required evidential standard, that the internationally important seabird populations located on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected by the proposed development. The placement of turbines within key foraging areas and migratory pathways has not been adequately evaluated, particularly regarding the risks of displacement, collision, and habitat loss.

A critical inconsistency arises within the application where the developer asserts that no significant adverse effects will occur while simultaneously pursuing a Habitats Regulations derogation case, which is necessitated only in scenarios where significant harm is anticipated. This contradiction raises serious doubts about the reliability of the

assessment, indicating that the conclusions drawn are not supported by the underlying evidence.

The evidence provided does not sufficiently assure that seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds is not fully considered, and the reliance on modelling approaches introduces uncertainty, especially for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly given incomplete baseline data and an inadequate understanding of behavioural responses.

Furthermore, situating turbines within a recognised migratory corridor presents an additional substantial risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately address the long-term consequences of sustained mortality in this corridor or the potential impacts on species that possess relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, compounded by data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle and obstructs a lawful conclusion in support of consent.

These deficiencies also signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted places the proposal directly at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is fundamentally flawed, neglecting to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, traditions, and community are deeply intertwined. The approach taken by the application is reductive, viewing heritage merely as isolated and static assets, rather than understanding their ongoing social, cultural, and spiritual relevance to the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, the assessment classifies them as unchanging features, failing to acknowledge their continued significance and the

potential impact of development on their surroundings. This mischaracterisation leads to an incomplete cultural evaluation and overlooks their vital role in community life.

Moreover, the application does not take into account intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the community and its coastal environment. These aspects are essential to the area's identity, yet they are conspicuously absent from the assessment, highlighting a critical omission. Without addressing these components, the cultural implications of the development cannot be comprehensively understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity, with traits characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the assessment's validity and fails to adhere to established principles for participation in decisions that impact cultural and environmental interests.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, particularly regarding the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a clear divergence from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural values, community rights, and statutory obligations results in a substantial evidential gap. The cultural ramifications of the development have not been adequately assessed, leading to the conclusion that the application does not offer a sufficient foundation for gauging the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks transparency and depth in assessing social impacts, health, and wellbeing, which is critical for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This absence signifies a notable evidential gap, hindering both public insight and the competent authority's understanding of the social risks identified in the developer's own research.

Summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct community engagement and are not speculative in nature. However,

without access to the complete assessment, there is limited capacity for proper scrutiny of these findings, which in turn restricts the evaluation of their significance in the decision-making process.

Furthermore, there is clear evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Unfortunately, these impacts have not been thoroughly integrated into the main application, nor have they received the weight they warrant. The failure to disclose the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functionality are at stake. By withholding the full dataset, the application does not provide a complete evidential basis necessary for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm, yet the evidence at hand reveals adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be validated.

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 complete Social Impact Assessment. This represents a significant omission in the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment inadequate and unreliable. This situation obstructs a lawful determination and reinforces the notion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly lacking. It does not capture the extent of change or the sensitivity of the environment surrounding the West Lewis coastline. This area is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The placement of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally changing this character and causing a permanent transformation of the landscape.

The application fails to represent the extent of visual change accurately. The size and closeness of the turbines would dominate the views from residential areas, historic

sites, and popular coastal locations. This would impact visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not properly convey the significance of these impacts within the context of such a sensitive landscape.

Methodological issues also arise concerning the choice and presentation of visual viewpoints. It appears that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises concerns that the scale of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, there is a failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Significant 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. Instead of acknowledging their interdependence, the assessment treats these as separate entities, leading to an incomplete analysis of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The scale of change is at odds with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of compliance with policy.

Moreover, it is evident that the identified impacts cannot be mitigated effectively. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Consequently, the resulting change would be fundamental and permanent, rather than reducible to an acceptable level through mitigation.

Overall, 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 reinforce the conclusion that the proposal is inconsistent with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents an incomplete assessment of construction and pollution risks, which lacks the necessary detail to evaluate potential environmental effects. It proposes significant seabed preparation and installation works in a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be prepared after consent, inhibiting any meaningful evaluation of their adequacy or effectiveness.

The sensitivity of the receiving environment raises additional concerns. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not provide enough information on how these risks will be prevented, controlled, or monitored.

There is also uncertainty concerning the scale and behaviour of sediment plumes that may 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 effects of these impacts. This uncertainty includes potential effects on marine species and habitats identified as sensitive in the broader assessment.

Further compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application hampers the evaluation of whether adequate safeguards exist to manage pollution events. This creates procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards conflicts with the Environmental Impact Assessment requirements. Significant effects and mitigation measures must be assessed before consent, and if this information is lacking, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of marine life and fisheries, leading to an incomplete understanding of ecological and socio-economic implications. The waters off the West Lewis coast are known for both their rich marine ecosystem and an active fishing industry. However, the application fails to adequately demonstrate that these essential uses and habitats will be safeguarded against substantial disruption.

A critical concern arises from the unfounded assumption that fishing activities can be relocated without adverse effects. There is no evidence provided that alternative fishing grounds exist or can support the increased pressure that displacement would entail. This lack of information is crucial, as such displacement poses a risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet.

Without a thorough, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The high-energy hammer piling expected over an extended period is likely to disturb a wide area, negatively affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population raises substantial concerns, yet the application seems to minimise these impacts without adequate supporting data.

Additionally, the application demonstrates a notable inconsistency in its acknowledgment of the need for licences to permit harm to European Protected Species while simultaneously claiming that these impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially in situations where harm is expected to necessitate legal authorisation.

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

From a policy standpoint, the application does not satisfy the requirements set forth in the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with current marine users or avert unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal aligns with sustainable development principles.

In summary, the deficiencies in the evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment incomplete and unreliable. These issues obstruct a comprehensive evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not adequately account for the full range of impacts from what constitutes a single integrated project. The offshore turbines and the onshore works are fundamentally interconnected; however, their separate assessments lead to a disjointed evaluation, obscuring the true magnitude of environmental and socio-economic consequences.

Key onshore components entail cabling across protected moorland, the construction of a substation near Stornoway, and the development of associated access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive area. The application fails to deliver a thorough assessment of these impacts,

hindering a complete understanding of the project's overall environmental footprint.

The lack of consideration for onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. The disjointed evaluation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully realised. There are considerable risks to sensitive habitats, including machair systems and peatland environments, which benefit from policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been considered, creating a significant evidential void regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that undermines the objectives of renewable energy development. This issue has not been adequately addressed by the application, nor has it been shown that the overall carbon balance remains advantageous. Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate 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 impacts can be avoided or mitigated further weakens the application. Collectively, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. However, the application currently under consideration fails to address the effects of permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon. This significant oversight fundamentally alters the night-time environment and compromises the visual amenity, landscape character, and overall experience of both residents and visitors.

There is also a notable absence of evaluation regarding the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting, which can lead to disorientation and increased collision risks. The lack of a lighting impact assessment or phototaxis study means that it is impossible to gauge how this aviation lighting may affect these species or contribute to their mortality.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and associated risks. Additionally, species like Kittiwakes, which may forage or migrate at night, are susceptible to the disorienting effects of artificial lighting, yet this risk remains unexamined. The absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts that may arise from the proposal.

Without a proper assessment of these nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The application does not meet the evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. Moreover, it detracts from a comprehensive evaluation of landscape and seascape impacts, as the night-time character is a fundamental aspect of the environment.

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

TOURISM

The evaluation of tourism impacts presented in the application is severely lacking, failing to address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The region's tourism is intrinsically linked to its natural assets, which include the wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution derived from tourism.

Tourism on the Isle of Lewis has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application neglects to model the potential effects of seascape industrialisation and environmental degradation on Tourism Gross Value Added, as well as on broader economic resilience. The lack of such analysis makes it impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the assessment disregards the critical role of environmental quality in bolstering tourism, particularly the significance of unspoiled landscapes and dark skies in shaping visitor experiences and catering to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a substantial 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 evaluate tourism impacts bears wider implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been appropriately considered, contrary to the requirements set forth by the Islands (Scotland) Act 2018.

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

In summary, the inadequacies in quantifying tourism impacts, assessing the environmental drivers influencing visitor behaviour, and recognising the island's economic dependencies culminate in a considerable evidential gap. This hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development, as it does not align with statutory duties, national policy, or evidential standards. This proposal mirrors the principal issues that led to the rejection of the Lewis Wind Power initiative in 2008, particularly concerning the unacceptable scale of industrialisation. Despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains deficient.

A reliable evidential basis for the determination of this application is lacking. Significant gaps exist in baseline data, and the continued use of an undefined design envelope raises concerns. The proposal relies on unspecified mitigation measures and neglects to address critical impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are also evident, notably the absence of a compliant Island Communities Impact Assessment, which constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the incomplete disclosure of the Social Impact Assessment is a material omission that hampers the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies make the application unfit for determination.

The proposal conflicts with National Planning Framework 4, as it does not adequately protect biodiversity, natural places, and cultural heritage. It also fails to demonstrate

that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore elements has not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent in some areas. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing any lawful conclusion regarding acceptable impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: AB8CDF92

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted in accordance with marine licensing and Environmental Impact Assessment protocols. The objection is grounded in a thorough examination of the Environmental Impact Assessment Report and associated documentation, highlighting 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, a region noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of the proposal with statutory requirements, national policies, and the fundamental principles of sustainable development.

The application is deficient in its evidential foundation, lacking critical environmental data and presenting limited, inconsistent baseline information. Numerous aspects of the proposal are inadequately defined. The flexible design framework employed leads to ambiguities about the likely significant effects, and the reliance on unspecified mitigation measures precludes any meaningful assessment of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the impacts on the environment, culture, or community. Assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, there are substantial conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not convincingly demonstrate compliance with national obligations aimed at preserving biodiversity, addressing climate concerns, and maintaining environmental integrity. These conflicts directly affect the statutory criteria for consent and compromise the ability of the competent authority to determine the acceptability of the development within policy contexts.

The unprecedented scale of this proposal raises further issues, as large turbines are to be positioned very close to the shoreline, leading to significant concerns about landscape capacity, visual impact, and environmental repercussions. Overall, the combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and fails to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, clear, or trustworthy account of the anticipated environmental consequences of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty and hinders a consistent evaluation of a worst-case scenario. This lack of clarity undermines the assessment's credibility, preventing both the public and the competent authority from grasping the true scale of environmental impacts.

Furthermore, the application significantly depends on unformulated mitigation measures, monitoring strategies, and management plans. Seeking consent under the premise that environmental damage will be addressed later restricts any substantial appraisal of effectiveness or evaluation of residual impacts. This postponement of essential information to post-consent stages is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigations are clearly defined prior to decision-making.

Moreover, the assessment contains notable evidential shortcomings, such as 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, particularly in instances where 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, thereby introducing scientific uncertainties that fail to meet statutory obligations.

Consequently, the application does not satisfy the evidential standards required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not adequately demonstrate compliance with National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it is unclear whether impacts have been thoroughly assessed or if suitable safeguards exist.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation measures, and the deficiencies in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings preclude a lawful and rigorous evaluation of environmental effects, placing the competent authority in a position where it cannot adequately assess the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The current proposal fails to provide a comprehensive assessment of marine ecology and protected species, particularly within the West Lewis coastal environment, which is known for its biological activity and sensitivity. The existing baseline data is inadequate, and the methodologies employed do not sufficiently capture the presence,

behaviour, and habitat use of various species. Consequently, there is no reliable evidential basis for assessing impacts.

Significantly, the application does not adequately recognise the presence and activities of otters, a species protected under European law, in coastal areas where they forage and move. The failure to evaluate their core foraging range and behavioural patterns leaves a gap in understanding the potential impacts from construction activities, noise, and increased human presence. This omission compromises any assertions made regarding the lack of significant effects on otters.

The assessment of basking sharks also reveals critical deficiencies, as reliance on aerial surveys introduces a considerable detection bias that is particularly pronounced in Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established observations from land-based surveys that show frequent use of these waters. The neglect to incorporate or adequately consider such vital data contributes to an incomplete baseline and undermines the reliability of the findings presented.

The methodological shortcomings lead to conclusions regarding negligible or non-significant effects being based on mere assumptions, rather than on robust evidence. Moreover, the lack of sufficient baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation results in uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment framework or the National Planning Framework 4. The inadequate identification and assessment of protected species introduce uncertainty that prevents the clear exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

In summary, the deficiencies stemming from incomplete baseline data, flawed methodologies, and unsubstantiated conclusions culminate in an unreliable assessment. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the development's impact on seabirds is fundamentally flawed. It presents significant gaps in evidence and contains internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate adequately that these species will not be adversely affected. Key foraging areas and migratory pathways are situated near the development, yet the assessment does not thoroughly evaluate risks related to

displacement, collision, or habitat loss.

There is a critical contradiction within the application itself. While the developer asserts that there will be no significant adverse effects, they simultaneously submit a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions drawn are not backed by the evidence provided.

The assessment lacks sufficient proof 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 introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used may underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Placing turbines within a recognised migratory corridor adds another layer of risk. This placement effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality in this corridor have not been sufficiently assessed, nor have the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data gaps, and modelling flaws means that the required standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and renders the conclusion in support of consent unlawful.

These identified deficiencies also indicate 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 conflict with national policy.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

presence that would irrevocably transform the landscape.

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

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with the application is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast not only support a diverse marine ecosystem but also house an active fishing industry. However, the application does not adequately demonstrate that these habitats and uses can be maintained without considerable disruption.

A significant concern is the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds are accessible, available, or able to bear additional pressure. This oversight is critical, as displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a well-supported assessment, the impacts on fisheries and the livelihoods of those dependent on them remain unclear.

The proposal also poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. The use of high-energy hammer piling for extended periods is likely to cause disturbances over large areas, potentially affecting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns. Nevertheless, the application minimizes the significance of these effects, lacking adequate supporting evidence.

There is an evident contradiction in the application concerning the necessity for licences to authorise harm to European Protected Species, while concurrently describing such impacts as negligible. This inconsistency undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly where harm is expected to a level that requires legal authorisation.

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

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

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

TOURISM

The evaluation of tourism impacts within the application is significantly lacking, with a failure to assess the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application indicates that 86% of visitors are attracted by the scenery, it does not provide any quantified assessment regarding how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this sector.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million currently, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not analyse how the industrialisation of the seascape and the degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. The lack of such an assessment means it is impossible to ascertain whether the proposed development would yield a net economic benefit or threaten an established and expanding sector.

Moreover, the assessment neglects the crucial role that environmental quality plays in attracting tourists, particularly regarding the preservation of unspoiled landscapes and dark skies that enhance visitor experiences. This oversight is further exacerbated by the omission of a Dark Skies Assessment, resulting in a significant gap in understanding the implications for a recognised and burgeoning segment of the local economy, such as nature-based tourism and astro-tourism.

In the context of an island community characterised by limited economic diversification, the lack of a thorough assessment of tourism impacts bears broader consequences for employment, local businesses, and the sustainability of communities. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4, particularly concerning economic impacts and the need to show a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic consequences of the proposal adequately.

Overall, the combined failure to quantify tourism impacts, assess the environmental drivers that influence visitor behaviour, and recognise the economic dependencies of the island culminates in a significant evidential gap. This deficiency hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the essential requirements for sustainable development when evaluated against statutory obligations, national policy, and necessary evidential standards. This proposal mirrors the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being presented under a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant shortcomings in the evidential basis for this proposal. It lacks complete and reliable baseline data, relies on an ambiguous design envelope, and depends on unspecified mitigation measures. Furthermore, it omits critical impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is insufficient and fails to provide a comprehensive understanding of likely significant effects or residual impacts.

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

The proposal directly contradicts National Planning Framework 4 by failing to demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. It does not illustrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been fulfilled, necessitating the application of the precautionary principle and preventing a lawful assertion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The volume of informational deficiencies, combined with policy contradictions and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent

based on these grounds or utilises the applicable regulatory provisions to demand the submission of the missing information.

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

Additional Comments

We cannot allow our whole coastline and areas of natural beauty to be destroyed. Wind Turbines may be clean but they are unsightly and dominate every view they visually pollute.

Not only are they an eyesore now but where will they be in 50 to 100 years.

As technology progresses these turbines may become disused and left to rot on our coast line. When the profits are gone, can we really believe a proper decommissioning program to return the areas to there original condition will happen.

I am looking to visit the western isles for a holiday soon. If sea views and wildlife is affected by wind farms I don't think I would choose to go.

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: B2556989

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 is grounded in a thorough review of the Environmental Impact Assessment Report and its supporting documentation, revealing significant deficiencies across various dimensions, including planning, environmental, cultural, and procedural aspects. 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 rich cultural identity. Concerns arise from the scale and design of the proposal, particularly regarding its adherence to statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful determination. Key environmental data is absent, baseline information is inadequate and inconsistent, and crucial elements of the proposal remain undefined. The reliance on a flexible design framework hinders the ability to evaluate likely significant effects, and the unspecified nature of mitigation measures prevents assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by reliable evidence.

Moreover, there are significant conflicts with established policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and overall environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, compromising the capacity of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines positioned close to the shoreline, raises critical concerns about landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation strategies, evidential deficiencies, 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 invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal seeks consent based on an Environmental Impact Assessment Report that is fundamentally flawed. The report lacks a complete, transparent, and reliable assessment of the potential environmental effects associated with the development. A flexible Project Design Envelope has been employed, which does not commit to specific turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty and hampers a thorough worst-case scenario analysis. Consequently, the integrity of the assessment is compromised, preventing both the public and the competent authority from fully grasping the true environmental impacts that may arise from the final development.

Moreover, the application heavily depends on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be addressed in the future obstructs any meaningful evaluation of these measures or an assessment of residual impacts. This postponement of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation must be thoroughly outlined before a decision is made.

Significant evidential deficiencies are present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such shortcomings lead to uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects lack robust supporting data. The insufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to comply with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it is not demonstrated that impacts have been comprehensively assessed or that suitable safeguards exist.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These shortcomings hinder a lawful and rigorous evaluation of environmental effects, leaving the competent authority without the necessary information to make a well-informed decision regarding the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is inadequate and does not deliver a thorough or trustworthy understanding of the ecological receptors in the West Lewis coastal area. This marine environment is sensitive and biologically rich.

However, the baseline data is lacking, and the methodologies employed do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment fails to provide a strong evidential basis for evaluating potential impacts.

One significant oversight is the treatment of otters, a species protected under European law. The application does not adequately acknowledge or assess their active use of the coastal areas for foraging and movement. This absence of consideration regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbances, noise, and increased human activity have not been sufficiently evaluated. This flaw undermines any assertions about the absence of significant effects on otters.

Deficiencies also appear in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, which is likely to lead to an underestimation of their presence. This is particularly evident when compared to well-established land-based observations that highlight frequent use of these waters. The neglect to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual risks to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment process and the National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced means that it cannot be confidently claimed that adverse effects are excluded beyond reasonable scientific doubt, which invokes the precautionary principle. Thus, consent cannot be lawfully granted in these circumstances.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, containing significant gaps in evidence and internal contradictions that undermine its findings. The development is situated within critical foraging areas and migratory routes, yet the application does not adequately evaluate the potential effects of habitat loss, collision risk, or displacement on seabird populations. The west coast of the Isle of Lewis is home to seabird

populations of international importance, many of which are already in decline. However, the application does not convincingly demonstrate that these species will not be adversely impacted.

There exists a notable contradiction within the application, as the developer claims no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the credibility of the assessment and suggests that the conclusions drawn lack solid support from the evidence provided. Furthermore, the assessment fails to substantiate that seabirds linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected, with the importance of their feeding grounds inadequately addressed. The reliance on modelling methods adds uncertainty, particularly for species facing severe declines like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly due to incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor introduces significant risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently explore the long-term consequences of sustained mortality within this corridor or the impact on species with small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to affirm no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling weaknesses means the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and prevents a lawful conclusion in support of consent.

Moreover, the identified deficiencies signify a lack of compliance with National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will remain unharmed places the proposal in direct opposition to national policy. Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not fulfill the statutory requirements needed for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity lacks depth and fails to recognise the West Lewis coastline as a vibrant cultural landscape, where environment, language, tradition, and community are deeply intertwined. Rather than appreciating heritage as a dynamic aspect of community life, the application reduces it to isolated, unchanging assets. This oversimplification overlooks the ongoing social, cultural, and spiritual significance these elements hold for the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and

places of spiritual practice; however, the assessment improperly categorises them as mere static features. This mischaracterisation neglects their continued use and significance, as well as the impact of development on their surroundings. Such an oversight leads to an incomplete understanding of cultural effects and disregards the integral role these sites play in community life.

Moreover, the assessment omits intangible cultural heritage, including the Gaelic language and traditions, alongside the longstanding relationship between the community and the coastal environment. These vital elements are essential to the area's identity yet are entirely absent from consideration, representing a grave oversight. Without acknowledging these aspects, the true cultural ramifications of the proposed development remain inadequately understood.

There are additional concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement raises questions about the validity of the assessment and contravenes established principles for involving communities in decisions that impact cultural and environmental interests.

A critical flaw in the process is the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal responsibilities to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

These shortcomings directly conflict with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application lacking a sufficient basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the absence of the complete report creates a substantial evidential gap. This omission hinders both public understanding and the competent authority's ability to assess the full scope of social risks identified in the developer's own research.

Residents are already reporting measurable levels of stress, anxiety, and concern due

to the size and proximity of the proposed development. These reactions stem from direct engagement with the community and are therefore rooted in reality, not speculation. However, without access to the full assessment, proper scrutiny of these findings is impossible, which limits the assessment of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal poses a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite these identified impacts, they have not been adequately reflected in the application nor given appropriate consideration. The failure to disclose the full Social Impact Assessment obscures the actual human and social costs of the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for projects of this magnitude, especially when community character and function may be at stake. By not presenting the complete dataset, the application lacks a solid evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not comply with the National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid causing harm, yet the evidence available points to existing adverse effects that remain undisclosed. Consequently, without the full assessment, compliance with this policy cannot be substantiated.

The procedural implications are profound. The competent authority cannot perform a comprehensive socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, along with the evidence of current adverse impacts, makes the assessment incomplete and unreliable. This prevents a lawful determination and highlights that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal seeks to introduce large-scale turbines along the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. This installation would establish a continuous industrial presence near the shoreline, leading to a fundamental and irreversible transformation of the landscape. The assessment of the seascape, landscape, and visual impacts associated with this proposal is materially deficient, failing to accurately represent the scale of change or the sensitivity of the receiving environment.

The visual impact of the turbines has not been properly conveyed, with the proximity

and scale of these structures likely to dominate views from residential areas, historic sites, and popular coastal locations. This dominance would severely affect visual amenity and degrade the essential qualities of naturalness and remoteness. Additionally, there are significant methodological issues concerning the selection and presentation of visual viewpoints. Evidence suggests that the viewpoints chosen may not adequately capture the most sensitive receptors or worst-case scenarios, especially regarding crucial cultural heritage sites and valued landscapes, which may lead to an understatement of the visual impact and compromise the assessment's reliability.

Furthermore, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape that is visually and spatially linked to the Atlantic horizon. Treating these assets as isolated entities undermines a comprehensive evaluation of their settings and cultural significance. The proposed industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their ties to the natural horizon. This presents not just a visual concern but also a broader cultural and spatial harm that the application has not adequately addressed.

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 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 thorough worst-case assessment further undermines any assertions of policy compliance.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The dominant and unavoidable presence of the turbines, due to their height and proximity, indicates that the resulting change is fundamental and permanent, beyond the realm of acceptable mitigation measures. Collectively, 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 reinforce the conclusion that the proposal is at odds with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies in the assessment of construction and pollution risks, lacking the necessary detail to properly evaluate potential environmental impacts. It proposes extensive seabed preparation and installation works in a high-energy Atlantic environment without providing fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on the preparation of mitigation and contingency measures after consent has been granted, which obstructs any substantial assessment of their adequacy or effectiveness.

This approach raises particular concerns given the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be effectively prevented, controlled, or monitored.

Moreover, there exists uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation activities. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of such disturbances. This uncertainty also pertains to the potential effects on marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application undermines the ability to assess whether appropriate safeguards are established to address pollution events. This situation introduces procedural risk and hinders the competent authority's capacity to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements set forth in the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to consent, and any absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in an assessment that is materially deficient. These inadequacies 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, which are at risk due to the inadequacies of the assessment regarding fisheries and marine life. The application does not provide a comprehensive evaluation of the ecological or socio-economic impacts, failing to demonstrate that these crucial habitats and activities can be preserved without significant disruption.

A critical concern is the assumption made in the application that fishing activities can be displaced without any negative consequences. There is a lack of evidence to support claims that alternative fishing grounds are available, accessible, and capable of handling the added pressure. This omission carries significant implications, as displacement could lead to overfishing in other areas and potentially result in wider

economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and the livelihoods tied to them remain obscured.

Moreover, the proposal poses substantial risks to marine species, particularly through the underwater noise generated by construction activities. The high-energy hammer piling anticipated over an extended period is likely to disturb marine life over considerable distances, notably affecting species such as dolphins. Concerns regarding the predicted disturbance to a significant portion of the local bottlenose dolphin population are serious, yet the application tends to downplay the significance of these effects without adequate supporting evidence.

An inconsistency arises within the application itself, acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously classifying these impacts as negligible. This contradiction casts doubt on the assessment's credibility and raises substantial concerns regarding compliance with the Habitats Regulations, especially in instances where harm is projected to an extent that necessitates legal authorisation.

Furthermore, the assessment fails to account for cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without an inclusive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

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 exist alongside current marine users or avoid unacceptable impacts on marine biodiversity, thereby preventing any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

The onshore aspects of the project include cabling that crosses protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes. Notably, this work involves excavation across deep peat areas, especially within Barvas Moor, an important carbon store and

ecologically sensitive habitat. The application fails to deliver a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's overall environmental footprint.

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

Additionally, there are considerable risks to delicate habitats, such as machair systems and peatland environments, which are protected by policy. The application does not prove that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential gap in terms of biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife constitutes a significant evidential gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for maintaining environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, which is visible over long distances, will create an intrusive "wall of light" effect across the western horizon and will fundamentally alter the night-time environment.

Moreover, 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 significant given the value of dark skies to the area's identity and the developing tourism sector focused on astro-tourism. Consequently, the neglect of these factors creates a substantial gap in the overall landscape and environmental assessment.

Importantly, the proposal does not include any evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to their phototactic behaviour, which can lead to disorientation and increased risk of collision. The absence of a lighting impact assessment or phototaxis study means that there has been no examination of how aviation lighting may affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment fails to account for nocturnal activity and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this vulnerability has not been evaluated. The lack of site-specific night-time data presents a critical shortfall in understanding the ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and obstructing a lawful determination.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the criteria for sustainable development when evaluated against statutory duties and national policy. It echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application, however, is framed within a stronger policy context that prioritises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

A reliable evidential foundation for this determination is lacking, marked by notable gaps in baseline data and the use of an undefined design envelope. It heavily relies on

unspecified mitigation measures while overlooking crucial impact pathways, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment remains incomplete, inhibiting a full understanding of the significant likely effects or residual impacts.

Procedural shortcomings are evident as well, notably the absence of a compliant Island Communities Impact Assessment, which violates statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment constitutes a serious omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

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

Uncertainties surround environmental risks, which could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals remain incomplete and, at times, inconsistent. The requisite evidential threshold needed to discount adverse effects beyond reasonable scientific doubt has not been achieved, thereby activating the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and the implications for tourism represent enduring effects that cannot be mitigated to an acceptable degree.

When considered collectively, the application is both procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or invoke the necessary regulatory provisions to demand the submission of the missing information.

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

Additional Comments

I'm strongly against this. Why pick one of the few areas of ONB to put this monstrosity. I can't understand the thinking behind destroying 40 acres of class 1 supposedly

protected peatland. People up and down the country are trying to restore peatland. Not to mention the extreme impact to our wonderful sea life.

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: CB5B6A33

