

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 a thorough examination of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies related to planning, the environment, cultural factors, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, known for its Atlantic-facing coastline, nearly untouched natural surroundings, and rich cultural heritage. Concerns about the scale, design, and proximity of the development call into question its alignment with statutory mandates, national policies, and the core principles of sustainable development.

The application does not present a sufficient evidential basis for a lawful decision. There is a lack of critical environmental data, inconsistencies in baseline information, and several essential elements of the proposal remain unclear. The implementation of a flexible design framework obscures the potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the available documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or insignificant effects lack robust support.

Substantial conflicts with policy are evident. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not demonstrate that national obligations to safeguard biodiversity, address climate issues, and maintain environmental integrity can be fulfilled. These discrepancies are fundamental to the statutory criteria for consent and compromise the capacity of the relevant authority to determine the project's acceptability in policy contexts.

The unprecedented scale of this proposal, with large turbines positioned alarmingly close to the shoreline, raises serious issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential shortcomings, and clear policy violations indicate that the application is incomplete and cannot support a lawful decision. Under these circumstances, the precautionary principle should be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology within the West Lewis coastal environment is deeply flawed, lacking a comprehensive understanding of the ecological receptors present in this biologically active marine system. The methodologies employed are inadequate, failing to capture essential data regarding species presence, behaviour, and habitat usage. Consequently, the baseline data remains incomplete, and the evidential foundation for evaluating potential impacts is significantly weakened.

A critical gap in the assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately address their foraging activities and movement across coastal areas. Without a thorough evaluation of their core foraging ranges and behavioural patterns, the potential impacts of construction disturbances, noise, and increased activity are not sufficiently examined. This oversight raises serious questions about the validity of claims regarding the lack of significant effects on this species.

Similarly, the evaluation of basking sharks suffers from serious methodological shortcomings. The reliance on aerial surveys introduces a significant detection bias, particularly in challenging Atlantic conditions. This bias likely leads to an underestimation of their presence, especially when compared to established land-based observations that demonstrate frequent activity in these waters. The failure to adequately incorporate such data results in an incomplete baseline, further undermining the reliability of the conclusions drawn.

The methodological deficiencies present mean that any conclusions drawn about negligible or non-significant effects rely on assumptions rather than solid evidence. The lack of sufficient baseline data complicates the meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. Such uncertainties elevate the risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess the presence of protected species. The uncertainties introduced by these deficiencies prevent any exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, the lawful granting of consent is not achievable.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These issues hinder a robust evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application is devoid of a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant shortcomings that undermine its reliability and the conclusions drawn within it. A considerable inconsistency exists, as the developer claims there will be no significant adverse effects while simultaneously pursuing a

derogation case under the Habitats Regulations, which is only necessary when significant harm is anticipated. This contradiction raises doubts about the validity of the assessment, suggesting that the findings are not substantiated by the available evidence.

The ornithological assessment is notably flawed, containing substantial gaps in evidence and internal inconsistencies. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to adequately demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located in proximity to the proposed development, yet the assessment does not thoroughly consider the implications of displacement, collision risk, or habitat loss.

In relation to protected sites, the assessment does not convincingly show that seabird species associated with areas 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 introduces a degree of uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. The methods employed are likely to underestimate mortality, particularly when baseline data is inadequate and behavioural responses are not entirely understood.

Moreover, the placement of turbines within a known migratory corridor poses an additional, substantial risk. This effectively creates a barrier in a primary flight path used by species travelling 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 relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold needed to affirm that there will be no adverse effect on the integrity of protected sites. The combination of conflicting conclusions, data gaps, and limitations in modelling means the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

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

In summary, these weaknesses in methodology, evidence, and internal consistency render the assessment unreliable. These flaws hinder a thorough evaluation of impacts and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided fails to adequately evaluate community identity and cultural heritage, notably overlooking the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are fundamentally interwoven. By adopting a reductive perspective that treats heritage as a collection of isolated and static assets, the application neglects to recognise their ongoing social, cultural, and spiritual relevance within the community.

There exists a significant deficiency in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites are not merely static features; they are active places of burial and spiritual practice. The current assessment mischaracterises these locations, failing to account for their continued use and meaning, as well as the potential impacts of development on their surroundings. Such misrepresentation results in an incomplete evaluation of the cultural effects and disregards their importance in community life.

Additionally, there is a troubling absence of consideration for intangible cultural heritage, which includes vital elements such as the Gaelic language, local traditions, and the deep-rooted relationship between the community and the coastal environment. These aspects are central to the area's identity but have been entirely omitted from the assessment, leading to a significant gap in understanding the cultural impact of the proposed development.

Concerns regarding community rights and engagement further exacerbate the situation. The Gaelic-speaking population, which embodies characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to established principles for participation in decisions affecting cultural and environmental matters.

Moreover, there is a critical procedural failure in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The lack of this assessment inhibits the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct conflict with the National Planning Framework 4, particularly with respect to the protection of historic assets and places. The failure to adequately consider both tangible and intangible heritage, along with the disregard for living cultural practices, signifies a clear deviation from policy requirements.

Collectively, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations culminates in a substantial evidential gap. The cultural impacts of the development have not been thoroughly assessed, and the application does not present a robust foundation for evaluating the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create an industrial presence that would fundamentally alter this character, resulting in a permanent transformation of the landscape. The assessment of seascape, landscape, and visual impacts fails to adequately represent the magnitude of visual change expected from this development. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, which directly impacts visual amenity and undermines the defining qualities of naturalness and remoteness.

Concerns regarding the methodology used for selecting and presenting visual viewpoints further exacerbate the deficiencies in the application. Evidence indicates that these viewpoints may not capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and significant landscapes. This suggests that the assessment has understated the visual impacts, casting doubt on its reliability.

Moreover, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated assets, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connections to the natural horizon. This represents a broader cultural and spatial harm that the application has not adequately assessed.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The scale of proposed change does not align with the requirement to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment undermines any claims of compliance with policy.

It is evident that the impacts identified in the assessment cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. The anticipated change is fundamental and permanent, making it unlikely that any mitigation measures could reduce the impacts to an acceptable level.

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

CONSTRUCTION AND POLLUTION RISKS

The evaluation of potential environmental impacts linked to construction and pollution is insufficient and lacks the necessary detail for a thorough assessment. The proposed project entails significant seabed preparation and installation activities within a challenging Atlantic setting. However, the application fails to present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are set to be developed after consent, which hinders any meaningful appraisal of their potential effectiveness or adequacy.

The reliance on undefined future actions is especially troubling considering the delicate nature of the surrounding environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to contamination and sediment disruption. Although the application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, it does not adequately outline strategies for their prevention, control, or monitoring.

There is also ambiguity concerning the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management approaches, it is impossible to gauge the ecological effects, duration, or extent of these impacts. This uncertainty extends to marine species and habitats deemed sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. The decision to delay contingency planning until after consent is granted obstructs the evaluation of whether suitable protections are in place to handle pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to scrutinise environmental protection measures at the critical point of determination.

From a regulatory standpoint, postponing essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be thoroughly assessed before consent is granted, and absent such information, a lawful decision cannot be reached. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These inadequacies obstruct a rigorous evaluation of construction and pollution risks, further reinforcing the argument that the application remains incomplete.

FISHERIES AND MARINE LIFE

The proposal fails to provide a thorough evaluation of the socio-economic impacts and ecological effects on the local marine life and fishing industry. The waters off the West Lewis coast host a rich marine ecosystem, yet the application does not adequately

demonstrate how these vital habitats can be preserved without substantial disruption.

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project fails to provide a complete picture of the impacts associated with what constitutes a single integrated development. The offshore

turbines and onshore works are inherently connected, yet they are evaluated separately, resulting in a fragmented analysis that obscures the actual environmental and socio-economic effects.

Onshore activities include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes. These operations entail excavation through areas of deep peat, particularly in Barvas Moor, an important carbon store and ecologically delicate habitat. The application lacks a thorough assessment of these implications, hindering a full understanding of the project's overall environmental footprint.

Furthermore, the exclusion or postponement of onshore impact assessments prevents an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the separation of offshore and onshore aspects obscures the combined impacts on peatlands, habitats, and local communities.

There are serious concerns regarding risks to sensitive habitats, such as machair systems and peatland environments, which have policy protections in place. The application fails to demonstrate that the effects on these ecosystems have been fully evaluated or that suitable avoidance measures are in place, highlighting a significant evidential gap in biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use rights. The application does not provide sufficient evidence that the necessary consents or processes have been initiated, which leads to concerns about the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment and the failure to show protection for peatlands, habitats, and land use interests contradicts the objectives of the National Marine Plan and National Planning Framework 4. The inability to confirm that impacts can be avoided or mitigated further undermines the application.

In summary, the disconnection between project components, the absence of a comprehensive assessment, and the insufficient 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 proposal introduces permanent red aviation lighting that would create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment. This significant change to the visual landscape of the West Lewis coastline, which is known for its exceptionally dark skies, raises serious concerns about the impact on environmental quality, cultural identity, and tourism, particularly for emerging sectors like astro-tourism. However, the Environmental Impact Assessment fails to assess the impact of this lighting on visual amenity and landscape

character, which is a critical omission given the importance of dark skies to the area's identity.

Moreover, the absence of an evaluation regarding the effects of artificial lighting on nocturnal wildlife is alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to light pollution due to phototaxis, which can lead to disorientation and heightened collision risk. The application does not include any analysis of lighting impacts or phototaxis studies, thus neglecting to assess how aviation lighting may affect these vulnerable species and potentially increase mortality rates.

The ornithological assessment's reliance on daytime survey data further exacerbates this issue, as it fails to capture nocturnal activity and the associated risks. Other species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. Without site-specific night-time data, understanding the ecological impacts remains critically incomplete.

In the absence of a thorough 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 preventing a lawful determination.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application revisits issues that led to the rejection of the Lewis Wind Power proposal in 2008, where unacceptable levels of industrialisation were identified. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not furnish a comprehensive or dependable evidential basis for evaluation.

Significant gaps exist in the baseline data, and the use of an undefined design envelope is concerning. Furthermore, the reliance on unspecified mitigation measures, as well as

the omission of essential impact pathways including nocturnal wildlife, full onshore infrastructure, and tourism effects, renders the Environmental Impact Assessment incomplete. This lack of thoroughness inhibits a full understanding of the likely significant effects or residual impacts.

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

Additionally, the proposal is in direct conflict with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to show acceptable health and wellbeing impacts, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed properly, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty around environmental risks remains considerable. 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 satisfied, which invokes the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to significant 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, along with negative impacts on tourism, would result in permanent effects that cannot be adequately mitigated.

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

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

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

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

Dear Sir/Madam

This representation serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. Concerns have been raised regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many elements of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of the potential significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not facilitate 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 are also evident and substantial conflicts with policy. The proposal appears to contradict 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 the national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts directly challenge the statutory tests needed for consent and weaken the capacity of the competent authority to determine the proposal's acceptability in policy terms.

Moreover, the scale of the project is unprecedented for this area, with large turbines situated in close proximity to the shoreline. This raises significant issues regarding landscape capacity, visual impact, and overall environmental consequences. When considered together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and pronounced policy non-compliance highlight that the application is incomplete and cannot support a lawful determination. Therefore, under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal's reliance on a flexible Project Design Envelope introduces a level of uncertainty that is deeply concerning. Without specific details on turbine dimensions, layouts, or configurations, it is impossible to apply a worst-case scenario consistently. This lack of commitment undermines the integrity of the Environmental Impact Assessment, leaving both the public and the competent authority without a true understanding of the proposal's environmental effects.

Additionally, the application seeks consent while heavily relying on mitigation measures and management plans that remain undefined at this stage. By postponing key information to be addressed post-consent, the application does not allow for a meaningful evaluation of the effectiveness of these measures, nor does it provide an accurate assessment of the residual impacts. This deferral is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment regime, which mandates that significant effects and their mitigation must be clearly established prior to any determination.

The deficiencies are compounded by significant gaps in baseline data and methodological limitations, leading to reliance on assumptions rather than site-specific evidence. Such gaps create uncertainty surrounding the scale and significance of impacts, especially where claims of negligible effects are made without robust supporting data. The insufficient information provided hampers the understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises serious concerns regarding the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, as it cannot substantiate that impacts have been thoroughly assessed or that adequate safeguards are implemented.

In summary, the combination of an undefined design envelope, the lack of specified mitigation, and gaps in baseline data casts doubt on the reliability and completeness of the Environmental Impact Assessment Report. These shortcomings prevent a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information at hand.

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.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. The ornithological assessment associated with the application is fundamentally flawed and exhibits considerable gaps in evidence and internal inconsistencies that detract from its conclusions. The application does not adequately demonstrate that these species will not be adversely affected, particularly given that the development is situated within key foraging areas and migratory pathways. There is a failure to robustly evaluate the implications of displacement, collision risk, or habitat loss.

A notable contradiction arises in the application, where the developer claims that there are no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts regarding the assessment's reliability and indicates that the conclusions presented lack adequate support from the underlying evidence.

Moreover, the assessment does not sufficiently prove 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 thoroughly considered, and the reliance on modelling approaches contributes to uncertainty, especially for species like Kittiwakes and Fulmars that are in sharp decline. The methodologies employed are likely to underestimate mortality, particularly in situations where baseline data is incomplete and the behavioural responses of species are not fully understood.

The siting of turbines within a recognised migratory corridor adds another significant risk, as it effectively creates a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential impact on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle and precludes a lawful conclusion supporting consent.

Overall, 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 impacted puts the proposal in direct contradiction to national policy. Collectively, these issues render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence, ultimately contributing to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity in the application is fundamentally inadequate, disregarding the West Lewis coastline as a dynamic cultural landscape where community, tradition, environment, and language are deeply interconnected. The application treats heritage as isolated, unchanging assets, failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

A major flaw is evident in the handling of culturally significant locations, particularly the cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites for burial and

spiritual practices. The assessment mischaracterises these spaces as static, ignoring their continued use and the implications of development on their surroundings. This oversight results in an incomplete understanding of cultural impacts and neglects their essential role in community life.

Moreover, the assessment fails to consider intangible cultural heritage elements, such as the Gaelic language, traditions, and the enduring connection between the community and its coastal environment. These factors are crucial to the area's identity yet are notably absent from the evaluation, which constitutes a significant oversight. The cultural implications of the proposed development cannot be adequately understood without addressing these components.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community, recognised as having distinct characteristics of an Indigenous People, has not been involved in a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and does not align with established principles of participation regarding cultural and environmental matters.

Another critical issue is the failure to conduct a compliant Island Communities Impact Assessment, a statutory requirement outlined in the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, especially concerning 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, signifies a clear deviation from required policies.

In sum, 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 proposed development have not been sufficiently evaluated, resulting in an application that does not adequately address the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been fully disclosed. This non-disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of social risks identified in the developer's own research.

Available summaries indicate that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been confirmed through direct engagement rather than speculation.

However, the failure to provide the complete assessment stifles 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 “cultural loss” highlighted in the developer's own findings. Despite the acknowledgment of these impacts, they have not been adequately incorporated into the main application or afforded appropriate consideration. The lack of transparency surrounding the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is imperative for developments of this magnitude, particularly when community character and functioning may be jeopardised. By withholding the full dataset, the application does not provide a complete evidential basis for weighing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, the evidence currently available reveals existing adverse effects that have not been fully articulated. Without the complete assessment, compliance with this policy remains unproven.

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, which constitutes a material omission within the application and fails to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment insufficient and unreliable. This situation impedes lawful determination and supports the assertion that the application lacks the necessary information for adequate evaluation.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly flawed, failing to adequately capture the extent of change or the sensitivity of the receiving environment. The West Lewis coastline features an open Atlantic horizon, retains an undeveloped character, and exudes a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would introduce a continuous and dominant industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application does not accurately represent the magnitude of the

anticipated visual change. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. This level of impact and its significance within such a sensitive landscape context are inadequately conveyed in the assessment.

There are also concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, compromising the assessment's reliability.

Moreover, the evaluation fails to address the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment considers these assets in isolation, neglecting their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not just a visual impact but also a wider cultural and spatial harm that remains inadequately assessed within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which is intended to protect natural areas and historic assets. The scale of proposed changes is at odds with the requirement 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.

Additionally, it is evident that the identified impacts cannot be effectively mitigated. Due to the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. The resulting change is thus fundamental and permanent, making it impossible to reduce the impact to an acceptable level through any mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The evaluation of potential environmental impacts linked to construction and pollution is insufficient and lacks the necessary detail for a thorough assessment. The proposed project entails significant seabed preparation and installation activities within a challenging Atlantic setting. However, the application fails to present comprehensive

Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are set to be developed after consent, which hinders any meaningful appraisal of their potential effectiveness or adequacy.

The reliance on undefined future actions is especially troubling considering the delicate nature of the surrounding environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to contamination and sediment disruption. Although the application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, it does not adequately outline strategies for their prevention, control, or monitoring.

There is also ambiguity concerning the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management approaches, it is impossible to gauge the ecological effects, duration, or extent of these impacts. This uncertainty extends to marine species and habitats deemed sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. The decision to delay contingency planning until after consent is granted obstructs the evaluation of whether suitable protections are in place to handle pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to scrutinise environmental protection measures at the critical point of determination.

From a regulatory standpoint, postponing essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be thoroughly assessed before consent is granted, and absent such information, a lawful decision cannot be reached. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These inadequacies obstruct a rigorous evaluation of construction and pollution risks, further reinforcing the argument that the application remains incomplete.

FISHERIES AND MARINE LIFE

The application presents an inadequate assessment of fisheries and marine life, lacking a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast support a rich marine ecosystem and an active fishing industry. However, the application does not demonstrate how these important uses and habitats can be preserved without causing significant disruption.

A major concern is the assumption that fishing activities can be relocated without

negative consequences. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can handle additional pressure. This lack of information is critical, as displacing fishing efforts could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and livelihoods remain unclear.

The proposal also poses considerable risks to marine species, especially due to underwater noise produced during construction activities. The high-energy hammer piling planned for an extended duration is expected to disturb marine life over large distances, notably affecting species like dolphins. The forecasted impact on a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

There is a clear contradiction in the application where it acknowledges the need for licences to harm European Protected Species while simultaneously describing those impacts as negligible. This inconsistency undermines the validity of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that requires legal authorization.

Additionally, the assessment overlooks the cumulative impacts stemming from multiple pressures, including habitat disturbance, noise, and fishing activity displacement. 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 the National Planning Framework 4 or the National Marine Plan. It does not illustrate how the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal constitutes sustainable development.

In summary, the assessment is incomplete and unreliable due to the lack of evidence regarding fishing displacement, underestimation of acoustic impacts, and internal contradictions. These shortcomings hinder a thorough evaluation of the effects on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when measured against statutory duties, national policy, and evidential standards. The application 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 significant concern. This new application is now put forth under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the evidential basis provided for this application. The design

envelope remains undefined, and the reliance on unspecified mitigation measures raises concerns. Furthermore, essential impact pathways—including effects on nocturnal wildlife, full onshore infrastructure, and tourism—have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, which inhibits a comprehensive understanding of the likely significant effects and residual impacts.

Procedural issues are also evident. The failure to submit a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority from adequately evaluating the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

This proposal directly contravenes the National Planning Framework 4. It does not sufficiently demonstrate protection for biodiversity, natural landscapes, and cultural heritage. It fails to indicate 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 effects of both offshore and onshore components have not been thoroughly assessed, leaving potential impacts on peatlands, carbon balance, habitats, and crofting land obscured.

There are also significant uncertainties regarding environmental risks. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in some areas. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been reached, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of the impacts.

Moreover, the proposal will 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 will result in permanent effects that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The scale of deficiencies in information, along with conflicts with policy and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or employ the relevant regulatory measures to compel the submission of the missing information.

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

Additional Comments

Erecting these turbines will destroy everything about our sacred island,we have a special beautiful island and this turbine farm cannot go ahead for many reasons,it is an utter disgrace that anyone who is from the island especially those in a higher position would agree to it going ahead,I really do hope and pray that it does not happen.

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: C76DC8A7

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

Dear Sir/Madam

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant shortcomings that compromise our understanding of the ecological receptors in the West Lewis coastal environment. This area is not only sensitive but also biologically

active, yet the baseline data provided is insufficient. The methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species, leading to a lack of sound evidential basis for evaluating potential impacts.

One critical oversight concerns otters, which are classified as a European Protected Species. The application fails to acknowledge their active foraging and movement along the coast, and neglects to assess their core foraging range and behavioural patterns. This oversight means the potential impacts of construction-related disturbances, including noise and increased activity, have not been thoroughly evaluated, undermining any assertions regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks demonstrates further deficiencies. The reliance on aerial surveys introduces substantial detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate the presence of basking sharks. The neglect to include or appropriately assess such data contributes to an incomplete baseline and diminishes the reliability of the findings.

These methodological flaws result in conclusions regarding negligible or non-significant effects that are founded on assumptions instead of robust evidence. Moreover, the lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, which raises concerns about the true risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to identify or adequately assess the protected species involved. The uncertainty created by these deficiencies obstructs the possibility of excluding adverse effects beyond a reasonable scientific doubt, thereby necessitating the precautionary principle. In light of these issues, granting consent is not a lawful option.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions culminates in an unreliable assessment. These critical failings hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application lacks reliability, marked by significant internal inconsistencies and methodological weaknesses that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing decline. Despite this, the application does not adequately demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are situated within the development zone, yet the assessment fails to thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

A critical contradiction arises within the application, where the developer asserts there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, an indication that significant harm is anticipated. This inconsistency raises serious doubts about the credibility of the assessment and suggests that the conclusions are unsupported by the available evidence.

The assessment falls short in demonstrating that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be impacted. Furthermore, the significance of these vital feeding grounds is inadequately considered. The reliance on modelling approaches introduces a level of uncertainty, especially for vulnerable species such as Kittiwakes and Fulmars, with the methodologies likely to underestimate potential mortality given the incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor poses an additional substantial risk by effectively creating a barrier in a key flight path utilised by species migrating between the United Kingdom and Iceland. The long-term consequences of ongoing mortality within this corridor are not sufficiently assessed, nor are the implications for species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the necessary evidential threshold to conclude there is no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and obstructs a lawful conclusion in favour of consent.

Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding the protection of biodiversity and natural assets. The failure to convincingly demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

Overall, these inadequacies render the assessment untrustworthy and compromise the ability to evaluate impacts thoroughly, leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the assessment of construction and pollution risks, which is notably incomplete and lacks the necessary detail to evaluate potential environmental effects. It entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is troubling. Instead, the application depends on mitigation and contingency measures that are to be prepared after consent, thereby hindering any meaningful assessment of their adequacy or effectiveness.

Particularly alarming is the reliance on undefined future measures in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to offer sufficient detail on the prevention, control, or monitoring of these risks.

Further compounding these issues is the uncertainty surrounding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also affects potential effects on marine species and habitats recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application obstructs an evaluation of whether adequate safeguards are established to address pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the point of decision-making.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Likely significant effects and necessary mitigation must be evaluated prior to consent, and the absence of this information renders a lawful determination impossible. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of fisheries and marine life, failing to provide a reliable evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem, yet the proposal does not adequately demonstrate that these vital habitats can be preserved without considerable disruption.

One major concern is the unsubstantiated assumption that fishing activity can be displaced without adverse effects. There is no evidence provided to indicate that alternative fishing grounds exist, are accessible, or are capable of accommodating increased pressure from displaced fishing efforts. This oversight is critical, as the potential for overfishing in other areas poses economic risks for the local fishing fleet.

The absence of a thorough, evidence-based assessment means that the implications for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over extended periods is likely to disturb marine life over considerable distances, impacting species such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population raises urgent concerns, yet the application diminishes the importance of these effects without adequate supporting evidence.

There exists a notable inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously downplaying the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially in instances where harm is expected to a degree that requires legal authorisation.

The assessment also overlooks the cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, 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 adherence to the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the proposed development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, obstructing any conclusion that the proposal constitutes sustainable development.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm presents significant shortcomings that undermine sustainable development, failing to meet the necessary statutory duties and national policy requirements. The project mirrors the core issues of the 2008 Lewis Wind Power proposal, which was previously denied due to unacceptable levels of industrialisation. Despite being submitted under an updated policy framework that emphasises biodiversity, peatland conservation, landscape preservation, and community wellbeing, the proposal still falls short.

Critical gaps in the evidence base are evident, particularly concerning baseline data and the reliance on an undefined design envelope. The proposal includes unspecified

mitigation measures and omits key impacts such as those on nocturnal wildlife, the full extent of onshore infrastructure, and potential effects on tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of significant effects or residual impacts.

Moreover, procedural deficiencies abound. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018, and the non-disclosure of a full Social Impact Assessment constitutes a serious omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts with National Planning Framework 4, lacking evidence of biodiversity protection, safeguarding natural areas and cultural heritage, and failing to demonstrate acceptable health and wellbeing impacts. It does not provide any proof of net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are not only uncertain but potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The application does not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposal is set to cause extensive and irreversible changes to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, along with the negative repercussions on tourism, represent permanent effects that cannot be sufficiently mitigated.

In summary, the application is procedurally and substantively unfit for determination. The numerous information deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority refuse consent based on these grounds or mandate the submission of the necessary missing information.

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

Yours faithfully,

[Redacted]

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all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: F6380375

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. It is grounded in a review of the Environmental Impact Assessment Report and associated documentation, highlighting significant planning, environmental, cultural, and procedural shortcomings. The development is proposed off the west side of the Isle of Lewis, a region noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity.

Substantial concerns arise from the scale, proximity, and design of the wind farm regarding its alignment with statutory requirements, national policy, and sustainable development principles. The application lacks an adequate evidential basis for a lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain undefined. The use of a flexible design framework complicates the understanding of potential significant effects, while the proposed mitigation measures, which have yet to be specified, hinder any assessment of their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack substantial evidence.

There are notable policy conflicts, as the proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is especially pertinent concerning biodiversity, natural habitats, cultural heritage, and community health and wellbeing. It does not sufficiently prove that the national requirements to safeguard biodiversity, climate interests, and environmental integrity are achievable. Such conflicts undermine the statutory tests necessary for consent and challenge the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns about landscape capacity, visual dominance, and environmental impact due to the large turbines being positioned in close proximity to the shoreline. The combined effect of inadequate information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. Given these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking and does not deliver a comprehensive, transparent, or dependable evaluation of the potential environmental effects associated with the proposal. The employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, which compromises the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the development that will ultimately be constructed, leaving both the public and the competent authority unable to grasp the true extent of the environmental consequences.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Consequently, consent is sought on the premise that any environmental harm will be addressed at a later date. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly established before any determination.

There are also substantial evidential shortcomings, which include gaps in baseline data, methodological limitations, and a dependency on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions asserting negligible or non-significant effects are presented without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

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

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and thorough evaluation of environmental effects, leaving the competent authority without the necessary information to make an informed determination on the application.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, as it does not align with statutory obligations, national policy, and necessary evidential standards. This proposal mirrors

the key issues that resulted in the refusal of the Lewis Wind Power application in 2008, where the extent of industrialisation was deemed unacceptable. Despite now being under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the deficiencies in the current application remain significant.

A thorough review reveals a lack of a complete and reliable evidential basis for determination. There are notable deficiencies in baseline data, the application employs an undefined design envelope, and it relies on unspecified mitigation measures. Furthermore, there is an absence of critical impact pathways, particularly regarding nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full comprehension of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment breaches the statutory requirements of the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment is a material oversight. Such deficiencies hinder the competent authority's ability to assess the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

Moreover, the proposal is directly at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. The lack of tourism impact modelling means that a net economic benefit cannot be evidenced. The cumulative effects of both offshore and onshore components have not been adequately assessed, clouding the understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are present, and inconsistencies exist within these evaluations. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, which invokes the precautionary principle and precludes a lawful conclusion 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 relationships, and the adverse effects on tourism create permanent impacts that cannot be mitigated to an acceptable level.

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

In light of these factors, a formal request is made for the refusal of the Spiorad na Mara Offshore Wind Farm application 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: 50167E4F

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 for consideration under relevant marine licensing and Environmental Impact Assessment frameworks. Our objection arises from a thorough examination of the Environmental Impact Assessment Report and associated documents, revealing significant planning, environmental, cultural, and procedural deficiencies. The site is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the compatibility of the scale, proximity, and design of the project with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. There is a concerning absence of critical environmental data, and the baseline information provided is both limited and inconsistent, leaving several key aspects of the proposal undefined. The proposed use of a flexible design framework hampers a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by robust evidence.

Substantial policy conflicts have been identified. The proposal does not 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 that it can meet national obligations for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests required for consent and diminish the capacity of the competent authority to determine that the project meets policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines positioned dangerously close to the shoreline. This raises critical issues regarding landscape capacity, visual dominance, and environmental impact. The cumulative effect of insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and evident policy non-compliance underscores that the application is incomplete and cannot support a lawful determination. In light of these findings, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents significant evidential deficiencies, marked by gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. This results in uncertainty about the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that fails to comply with statutory requirements.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed in the future obstructs a meaningful evaluation of effectiveness and the assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation be clearly delineated before determination.

A flexible Project Design Envelope, without definitive commitments to specific turbine dimensions, layouts, or configurations, injects significant uncertainty and obstructs a consistent application of a worst-case scenario. This compromises the integrity of the assessment, meaning that the impacts outlined may not accurately reflect the development that is ultimately constructed. Consequently, this prevents both the public and the competent authority from grasping the true extent of environmental effects.

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

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the evident gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to a materially inadequate assessment of alternatives. Instead of providing a well-structured and reasoned comparison of realistic alternatives based on environmental effects, it offers a narrative account of project evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

The assessment lacks a transparent and evidence-based comparison of alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has seriously considered positioning turbines further offshore, an action that could potentially reduce visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity and the significance of proximity to shore in determining impact highlight the inadequacies in this analysis, preventing any conclusion that the proposed siting is the least damaging option.

Furthermore, the deficiencies are evident in cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with a lack of comparative analysis, indicates a failure to apply mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight signifies a failure to adhere to the established mitigation hierarchy, thereby limiting 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 affirmed that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall determination that the application has not been thoroughly evaluated and cannot sustain a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species for the West Lewis coastal environment is fundamentally inadequate, failing to provide a complete understanding of ecological receptors in this sensitive and biologically rich marine system. The methodologies employed are insufficient, leading to incomplete baseline data that do not reliably capture species presence, behaviour, and habitat use. Consequently, there is no sound evidential basis for evaluating potential impacts.

The assessment notably overlooks otters, classified as a European Protected Species. The application does not adequately recognise or evaluate their active use of coastal areas for foraging and movement, failing to consider their core foraging range and behavioural patterns. This gap in understanding means that the potential effects of construction disturbance, noise, and increased activity on otters have not been properly assessed, undermining any conclusions regarding the absence of significant effects on this species.

Similar deficiencies are evident in the assessment of basking sharks, where reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline, thus compromising the reliability of the conclusions drawn.

These methodological shortcomings render conclusions of negligible or non-significant effects based more on assumptions than on robust evidence. Furthermore, the absence of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variation and interactions within the broader ecosystem. This creates uncertainty about the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions results in an unreliable assessment. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and indicate that the application does not rest on a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented is fundamentally unreliable, riddled with internal inconsistencies and gaps in evidence that significantly undermine its conclusions. It fails to meet the required evidential threshold necessary to demonstrate that the development will not adversely affect internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline. The turbines are sited within critical foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

Moreover, there is a glaring contradiction within the application itself. The developer asserts that there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency raises serious doubts regarding the reliability of the assessment and suggests that the conclusions drawn are not backed by sufficient evidence. The assessment lacks adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It does not fully consider the significance of these feeding grounds, and the reliance on modelling introduces uncertainty, particularly for species such as Kittiwakes and

Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially in the face of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor compounds the risks involved, as it effectively creates a barrier in a primary flight path used by birds travelling between the United Kingdom and Iceland. The long-term implications of ongoing mortality within this corridor, along with the potential impacts on species with relatively small global populations, have not been thoroughly assessed in the application.

From a regulatory standpoint, the application does not achieve the necessary standard to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and methodological limitations means that the requisite standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle and renders any conclusion in support of consent unlawful. Additionally, the identified deficiencies indicate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places this proposal in direct conflict with national policy.

In summary, the assessment's internal inconsistencies, methodological flaws, and lack of sufficient evidence prevent a thorough evaluation of the potential impacts, leading to the conclusion that the application does not satisfy the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application inadequately assesses cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. It adopts a simplistic view, treating heritage merely as a collection of isolated, unchanging assets rather than acknowledging their active social, cultural, and spiritual roles within the community.

A significant shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet the assessment regards them as static elements, neglecting their ongoing significance, use, and the effects of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural impacts and overlooks their importance in community life.

Moreover, the assessment fails to take into account intangible cultural heritage, such as the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These aspects are crucial to the area's identity but are entirely omitted from the assessment, representing a notable gap.

Without considering these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as having characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and does not adhere to established principles of participation in decisions affecting cultural and environmental matters.

There is a critical procedural oversight in the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. This omission means that the competent authority cannot meet its legal obligations to assess the social, cultural, and economic impacts on the island community. Consequently, it prevents a lawful determination of the proposal.

From a policy standpoint, these deficiencies put the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to evaluate both tangible and intangible heritage, along with the neglect of living cultural practices, signifies a clear deviation from policy standards.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory requirements results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, leaving the application insufficient for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment included engagement with local residents, but the full report remains unpublished, creating a significant evidential gap. This lack of transparency hampers both public understanding and the competent authority's ability to gauge the extent of social risks identified in the developer's own research.

Residents are reportedly facing measurable levels of stress, anxiety, and concern linked to the proposal's scale and proximity. These reported impacts stem from direct community engagement and should not be considered speculative. However, without access to the complete assessment, the implications of these findings cannot be properly scrutinised, which limits their significance in the decision-making process.

Furthermore, the proposal is viewed as a potential threat to community identity and cohesion, with the developer acknowledging “cultural loss” in their findings. Despite this, the impacts have not been adequately incorporated into the main application or given the necessary weight. The decision to withhold the full Social Impact Assessment obscures the real 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 projects of this magnitude, especially when community character and functioning may be at stake. The failure to provide the complete dataset means the application lacks a robust evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not illustrate compliance with the National Planning Framework 4 concerning health and wellbeing. It is essential for developments to foster positive health outcomes and mitigate harm. However, the existing evidence points to adverse effects that remain undisclosed. Without the full assessment, it cannot be demonstrated that the application meets policy requirements.

The procedural ramifications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This situation represents a material omission within the application and a failure to satisfy the evidential standards of the Environmental Impact Assessment framework.

Overall, the non-disclosure of the full Social Impact Assessment, together with the evidence of existing adverse impacts, renders the evaluation incomplete and untrustworthy. This situation hinders a lawful determination and underscores that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts, landscape, and seascape is seriously lacking. It does not accurately reflect the significant changes and the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed large-scale turbines would create a constant industrial presence near the shore, which would fundamentally change this character and lead to an irreversible transformation of the landscape.

The application fails to properly illustrate the scale of the visual change that would occur. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the level of this impact or its significance in relation to such a sensitive landscape.

Concerns arise regarding how visual viewpoints were selected and presented. Evidence indicates that some viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially for key cultural heritage sites and important landscapes. This raises the possibility that the visual impact has been understated, which undermines the reliability of the assessment.

Another shortcoming is the lack of evaluation of how landscape, seascape, and cultural heritage are interconnected. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape that is visually and spatially connected to the Atlantic horizon. The assessment treats these as separate entities rather than acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections and change how heritage assets are experienced, altering their relationship with the natural horizon. This represents not just a visual impact, but also a broader cultural and spatial harm that has not been adequately examined in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The scale of change is at odds with the need to protect landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of 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 overwhelming and unavoidable. Therefore, the resulting change is fundamental and permanent, rather than something that could be mitigated to an acceptable level.

Overall, the assessment does not accurately represent the extent of the impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents an incomplete assessment of construction and pollution risks, lacking the detail necessary to evaluate potential environmental effects. It entails extensive seabed preparation and installation works in a high-energy Atlantic environment but 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 is granted, which hampers a meaningful assessment of their adequacy and effectiveness.

This reliance on unspecified future measures raises significant concerns, particularly given 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 does acknowledge risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes that may arise from the 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 encompasses potential effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

Furthermore, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution incidents. This deferral introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation before granting consent, and the absence of this information means a lawful determination cannot be achieved. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts make the assessment materially deficient. These deficiencies hinder a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast support a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life in the application is insufficient and does not provide a thorough evaluation of ecological or socio-economic impacts. It fails to demonstrate that these uses and habitats can be protected or maintained without significant disruption.

A primary concern is the assumption that fishing activity can be displaced without consequences. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of supporting additional pressure. This is significant, as such displacement risks overfishing elsewhere and could have wider economic repercussions for the local fleet. Without a clear, evidence-based assessment, the impacts on fisheries and livelihoods remain poorly understood.

The proposal also poses substantial risks to marine species, particularly through underwater noise generated during construction. High-energy hammer piling over an extended period is expected to cause disturbances over large distances, impacting species such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population raises serious concerns. However, the application downplays the significance of these effects without sufficient supporting evidence.

There is an inconsistency within the application regarding the need for licences to

permit harm to European Protected Species, while simultaneously describing impacts as negligible. This contradiction undermines the assessment's credibility and raises concerns about compliance with the Habitats Regulations, especially where harm is anticipated that requires legal authorisation.

Additionally, the assessment does not consider cumulative impacts from multiple pressures, including habitat disturbance, noise, and displacement of fishing activity. Without a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is significantly lacking, failing to address the full range of impacts associated with what constitutes a single integrated development. The offshore turbines and the onshore works are inherently connected; however, they are evaluated separately, leading to a fragmented approach that obscures the comprehensive environmental and socio-economic effects of the project.

The onshore components consist of cabling traversing protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is both a critical carbon store and an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting or postponing the evaluation of onshore impacts, the application fails to allow for an accurate assessment of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered in tandem, yet the division between offshore and onshore components means that the combined effects on peatlands, habitats, and communities remain inadequately understood.

Moreover, there are considerable risks to delicate habitats, such as machair systems and peatland environments that enjoy policy protection. The application does not sufficiently demonstrate that the potential impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place. This presents a substantial evidential gap in relation to the protection of biodiversity.

The proposal also prompts concerns about the carbon balance. Disturbing peatland releases stored carbon, which could create a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently tackle this concern or confirm that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or procedures have been initiated, leading to uncertainties regarding deliverability and lawful implementation.

From a policy standpoint, the failure to consider the project in its entirety and to show protections for peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding nocturnal wildlife and dark skies represents a serious shortfall within the Environmental Impact Assessment. The West Lewis coastline, known for its exceptionally dark skies, is crucial for environmental quality, cultural identity, and tourism, particularly in emerging sectors such as astro-tourism. The introduction of permanent red aviation lighting, which would be visible over extensive distances, risks creating an intrusive "wall of light" effect that would significantly disrupt the natural night-time environment.

There is no evaluation of the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning considering the significance of dark skies to the local identity. Moreover, the assessment fails to address the implications for nocturnal wildlife, including species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are particularly vulnerable to artificial lighting due to their phototactic responses that may lead to disorientation and increased collision risks. The application does not provide a lighting impact assessment or a phototaxis study, meaning the potential effects of aviation lighting on these species, along with the associated mortality risks, remain unexamined.

This critical oversight is exacerbated by an overreliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities or the risks they entail. Species such as Kittiwakes, which may forage or migrate at night, are equally at risk of disorientation from artificial lighting, yet this has not been included in the assessment. The absence of specific data regarding night-time conditions creates a

significant gap in understanding the ecological impacts involved.

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

From a policy standpoint, this oversight is at odds with National Planning Framework 4, which pertains to the safeguarding of natural spaces and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time environments is a fundamental component of the broader ecological context.

In summary, the absence of assessments concerning dark skies and nocturnal wildlife creates a substantial evidential void. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and insufficient for supporting a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development when examined against statutory duties, national policy, and evidential standards. This application revisits the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. The current application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still falls short.

Critical gaps in baseline data render the evidential basis for determination incomplete and unreliable. The application relies on an undefined design envelope and unspecified mitigation measures, and it fails to address key impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment lacks completeness and does not facilitate a comprehensive understanding of likely significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the 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, making the application unfit for determination.

The proposal is in direct conflict with National Planning Framework 4, as it fails to protect biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that health and wellbeing impacts are acceptable, nor does it provide

evidence of a net economic benefit due to the lack of tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore elements has not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which could be significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals reveal internal inconsistencies. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

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

Collectively, these factors indicate that the application is procedurally and substantively unfit for determination. The extensive deficiencies in information, in conjunction with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority should refuse consent based on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

I strongly object to the proposed wind farm off the Isle of Lewis. This development threatens fragile marine ecosystems, placing seabirds, migratory species, and local wildlife at serious risk from habitat disruption and collision. The construction and maintenance will introduce noise and visual pollution into an environment long defined by its natural beauty and ecological balance. Beyond environmental harm, it undermines the cultural heritage of the island, where landscape and identity are inseparable. Industrialising these waters disregards the community's deep-rooted connection to place and sets a damaging precedent for sacrificing irreplaceable environments for short-term gain.

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: E6DEE769

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

Dear Sir/Madam

This letter formally objects to the Spiorad na Mara Offshore Wind Farm application, which was submitted under marine licensing and Environmental Impact Assessment regulations. The objection is founded on a review of the Environmental Impact Assessment Report and its accompanying documents. It identifies significant planning, environmental, cultural, and procedural deficiencies within the proposal. This development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and strong cultural identity. Concerns arise regarding the scale, proximity, and design of the project, as these factors appear to conflict with statutory requirements, national policy, and sustainable development principles.

The application does not present an adequate evidential basis for lawful determination. There is missing critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, key aspects of the proposal remain unspecified. The flexible design framework used in the application obstructs a clear understanding of significant effects, and without defined mitigation measures, it is impossible to assess their effectiveness. Consequently, the submitted documentation fails to provide a complete or informed understanding of the environmental, cultural, or community impacts. Claims asserting negligible or non-significant effects lack robust supporting evidence.

There are substantial policy conflicts present. The proposal seems inconsistent with the National Marine Plan, Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not prove that it can meet the national requirements for protecting biodiversity, climate interests, and environmental integrity. These discrepancies challenge the statutory tests necessary for obtaining consent and hinder the competent authority's ability to determine the proposal's acceptability according to policy.

The unprecedented scale of this proposal, which includes large turbines placed near the shoreline, raises significant concerns related to landscape capacity, visual dominance, and environmental impact. When considering the insufficient information provided, the reliance on undefined mitigation measures, evidential weaknesses, and clear policy violations, it is evident that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive, transparent, and reliable evaluation of the potential environmental impacts of the proposal. The incorporation of a flexible Project Design Envelope, which does not commit to particular turbine sizes, arrangements, or configurations, introduces a substantial level of uncertainty. This approach hampers the ability to apply a consistent worst-case scenario, thereby compromising the assessment's integrity. Consequently, the impacts outlined may not accurately represent the final development, leaving both the public and the competent authority without a clear understanding of the actual environmental consequences.

The application places excessive reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be rectified later prevents a meaningful assessment of the effectiveness of these measures or the evaluation of residual impacts. Deferring critical information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies be clearly defined before any determination is made.

Furthermore, there are considerable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the scale and significance of potential impacts, especially when conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot meet statutory requirements.

As a result, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and vulnerable habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it does not convincingly establish that impacts have been thoroughly assessed or that suitable safeguards exist.

In summary, the reliance on an ambiguous design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies impede a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to demonstrate a proper assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, the application presents a narrative that outlines the project's

evolution. This methodology does not establish that less harmful options have been adequately identified, assessed, and chosen over more damaging alternatives.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to provide a thorough understanding of the ecological receptors in the West Lewis coastal area. This region is particularly sensitive and biologically rich, yet the baseline data is incomplete, and the methodologies used do not accurately capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A significant oversight involves otters, a European Protected Species, where the application does not adequately recognise or assess their active utilisation of coastal regions for foraging and movement. The omission of their core foraging range and

behavioural patterns results in an inadequate evaluation of how construction disturbance, noise, and increased activity could affect them. This undermines the conclusions drawn 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 leads to substantial detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of these sharks, especially when compared to established land-based observations indicating their 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 reached.

These methodological shortcomings imply that the claims of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies makes it impossible to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with the application exhibits significant deficiencies, marked by notable gaps in evidence and contradictions that diminish its credibility. It is essential to recognise that the west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to adequately demonstrate, to the necessary evidential standard, that these species will not face adverse impacts. The development's location within critical foraging areas and migratory pathways further exacerbates the issue, as the assessment does not thoroughly analyse potential displacement, collision risks, or habitat loss.

A critical inconsistency within the application arises from the developer's assertion that there will be no significant adverse effects, coupled with the pursuit of a Habitats Regulations derogation case. Such a case is only necessitated when significant harm is anticipated. This contradiction raises serious questions regarding the assessment's

reliability, suggesting that the conclusions drawn are unsupported by the foundational evidence.

Furthermore, the assessment lacks sufficient evidence to ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not comprehensively acknowledged, and the reliance on modelling techniques brings uncertainty, particularly concerning species in steep decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underreport mortality rates, particularly in the absence of complete baseline data and a full understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses substantial risks, essentially creating an obstruction in a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of ongoing mortality within this corridor or the potential ramifications for species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data inadequacies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thus precluding a lawful conclusion in support of consent.

Moreover, the identified deficiencies signify a failure to comply with National Planning Framework 4 concerning biodiversity protection and the conservation of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unharmed places the proposal in direct opposition to national policy.

In summary, the assessment's reliability is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings inhibit a comprehensive evaluation of the impacts and collectively indicate that the application does not fulfil the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously lacking and does not acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are deeply intertwined. The application takes a narrow view, treating heritage as disconnected, unchanging assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is how culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas are handled. These sites serve as active burial places and spiritual locations, yet the assessment treats them as fixed features, overlooking their

current use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to an incomplete assessment of cultural effects and fails to acknowledge their importance in community life.

The assessment also neglects to consider intangible cultural heritage elements, such as the Gaelic language and local traditions, as well as the enduring connection between the community and the coastal environment. These aspects are crucial to the area's identity but are entirely omitted from the evaluation, representing a major gap. Without addressing these factors, the true cultural impact of the development cannot be adequately grasped.

There are additional concerns regarding community rights and involvement. The Gaelic-speaking population has a unique cultural identity, recognised as characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and does not adhere to established principles of involvement in decisions that affect cultural and environmental matters.

A significant procedural error is the failure to conduct a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the relevant authority is unable to meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This absence alone makes lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially regarding the protection of historic assets and places. The oversight of both tangible and intangible heritage, along with the failure to recognise living cultural practices, is a clear deviation from policy expectations.

In summary, the neglect of living heritage, intangible cultural values, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the development have not been properly assessed, and the application fails to provide an adequate foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment creates a significant evidential gap, which hampers the ability of both the public and the competent authority to grasp the complete range of social risks identified by the developer's own research. While a Social Impact Assessment was commissioned and included focus groups with local residents, the absence of the full report restricts proper scrutiny of its findings. Summaries suggest that residents are already experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are not speculative; they stem from direct engagement with the community.

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

with “cultural loss” highlighted in the developer’s findings. Despite this, such impacts have not been adequately integrated into the main application or given appropriate consideration. The lack of transparency in withholding the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency undermines the Environmental Impact Assessment process, which necessitates a comprehensive understanding of social, economic, and health impacts, especially for projects of this magnitude that may influence community character and functioning. Without the complete dataset, the application fails to provide a thorough evidential basis to assess the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid harm; however, the evidence available indicates existing adverse effects that remain undisclosed. Consequently, without the full assessment, adherence to this policy cannot be established.

The implications for the procedural aspects are notable. The competent authority cannot effectively carry out a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This situation reflects a material omission within the application, failing to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its undeveloped nature, open Atlantic horizon, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, significantly altering this unique character and leading to a permanent transformation of the landscape. The application fails to adequately reflect the magnitude of this visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and compromising the naturalness and remoteness that define the area.

Moreover, there are significant methodological issues regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, especially in relation to key cultural heritage sites and high-value landscapes. This suggests that the visual impact may be underestimated, which calls into question the reliability of the assessment.

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

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

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

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

Collectively, the assessment does not accurately represent the scale of impact, the environment's sensitivity, or the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks remains incomplete, lacking the detail necessary to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures to be formulated post-consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly concerning due to the sensitivity of the receiving environment. The West Lewis coastline, known for its clean coastal waters and important habitats, is vulnerable to sediment disturbance and contamination. Although the application acknowledges risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on

how these risks will be prevented, controlled, or monitored.

Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological 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.

The absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and diminishes the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are assessed before consent is granted; the absence of such information means a lawful determination cannot be achieved. The application further fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with this application is inadequate and does not provide a thorough evaluation of the ecological or socio-economic impacts involved. The waters off the West Lewis coast not only host a diverse marine ecosystem but also support an active fishing industry. However, the application fails to prove that these vital uses and habitats can be protected or maintained without significant disruption.

A major concern arises from the assumption that fishing activity can be displaced without any adverse consequences. There is no evidence provided that alternative fishing grounds exist, are accessible, or can sustain additional pressure. This is a significant oversight, as such displacement could lead to overfishing in other areas and potentially harm the local fishing fleet's economic viability. Without a sound and evidence-based assessment, the potential impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, primarily due to the underwater noise produced during construction. The prolonged use of high-energy

hammer piling is likely to cause disturbances over large distances, affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay the seriousness of these effects, lacking sufficient supporting evidence.

There is also a glaring inconsistency within the application itself; it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction calls into question the reliability of the assessment and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It fails to indicate 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 conclusion, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions collectively render the assessment incomplete and unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns about carbon balance. The disturbance of peatland can lead to the release of stored carbon, resulting in a carbon debt that is contrary to the goals of renewable energy development. The application fails to sufficiently address this matter or demonstrate that the overall carbon balance will remain positive.

Moreover, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence presented that indicates the necessary consents or processes have been initiated, which calls into question the deliverability and lawful execution of the project.

There are substantial risks to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not show that impacts on these habitats have been fully assessed or that suitable avoidance measures have been taken. This reveals a significant evidential gap in terms of biodiversity protection.

The assessment of onshore infrastructure is materially incomplete and does not account for the full range of impacts associated with what is fundamentally a single integrated project. The onshore works and offshore turbines are intrinsically linked yet assessed separately, leading to a fragmented approach that conceals the true scale of environmental and socio-economic effects.

The onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure that traverses sensitive landscapes. These works entail excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be assessed collectively; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain inadequately understood.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment for the proposed development fails to address the assessment of dark skies and nocturnal wildlife, representing a substantial omission. The introduction of permanent red aviation lighting will be visible over long distances and will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application neglects to evaluate how this lighting will affect visual amenity, landscape character, and the experiences of residents and visitors. This oversight is particularly concerning, as dark skies play a crucial role in the area's identity and in the development of emerging tourism sectors, such as astro-tourism. The omission leads to a clear gap in the overall landscape and environmental assessment.

Furthermore, there is a lack of evaluation regarding 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 an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the application does not adequately consider how the aviation lighting might affect these species or contribute to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not reflect 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 potential impact remains unassessed. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 concerning the protection of natural places and environmental quality. Additionally, this neglect undermines the broader assessment of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

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

TOURISM

The Isle of Lewis has seen tourism grow considerably, with its economic value increasing from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to model how large-scale offshore infrastructure could impact this vital sector. It acknowledges that 86% of visitors are attracted by the natural scenery, yet does not provide a quantified assessment of how such industrialisation might affect visitor numbers, behaviour, or the overall economic contribution of tourism.

In addition, the assessment overlooks the essential role that environmental quality plays in supporting tourism. The significance of the area's unspoiled landscapes and dark skies is critical to the visitor experience, especially in emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, resulting in a notable gap in understanding how the proposed development might affect these aspects of the local economy.

Given the limited economic diversification within the island community, the lack of a comprehensive assessment of tourism impacts carries wider implications for local employment, businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been thoroughly evaluated, as required by the Islands (Scotland) Act 2018. Furthermore, from a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefit. It also fails to align with strategic objectives that prioritise tourism as a growth sector and does not provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

Collectively, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and recognise the island's economic reliance leads to a significant evidential gap. This hampers a robust evaluation of the economic effects, ultimately suggesting that the application is incomplete.

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

Living in the Highlands of Scotland and seeing the negative impacts vastly outweighing the benefits this is a criminal project being so close to the shore.

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: D8DE4BF3

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and associated documentation has revealed significant planning, environmental, cultural, and procedural deficiencies.

The proposal is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. However, the scale and design of the proposed development pose serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

Moreover, the application lacks an adequate evidential basis necessary for lawful determination. Missing critical environmental data, inconsistent baseline information, and undefined key aspects of the proposal contribute to a significant lack of clarity. The use of a flexible design framework complicates understanding of potential significant effects, while unestablished mitigation measures leave their efficacy unassessed. Consequently, this documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible effects unsupported by robust evidence.

Furthermore, there are evident policy conflicts present within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

Given the unprecedented scale of this proposal and the placement of large turbines close to the shoreline, significant concerns arise related to landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents a materially deficient analysis, failing to deliver a comprehensive, transparent, or reliable overview of the likely environmental effects associated with the proposal. A key issue lies in the employment of a flexible Project Design Envelope, which lacks commitment to defined turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and obstructs a consistent application of a worst-case scenario. Consequently, the integrity of the assessment is compromised, leading to a situation where the impacts reported may not accurately reflect the actual development that will be constructed. This gap in information hinders both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Furthermore, the application places significant reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under the premise that potential environmental harm will be addressed subsequently obstructs any meaningful evaluation of effectiveness and the assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and their mitigation be clearly outlined prior to determination.

There exist substantial evidential deficiencies as well, characterised by gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty regarding the magnitude and significance of the impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information precludes a clear understanding of cumulative and worst-case impacts and introduces a level of scientific uncertainty that fails to meet statutory requirements.

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

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. Such deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to determine the application based on the information provided.

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 presented in the application is marred by significant methodological weaknesses and internal inconsistencies, resulting in an unreliable evaluation of impacts. Notably, the application does not adequately demonstrate that internationally important seabird populations, many of which are already in decline, will remain unaffected by the proposed development. The west coast of the Isle of Lewis is a

critical habitat for these species, yet the assessment fails to provide sufficient evidence that their foraging areas and migratory pathways will be preserved.

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the development's impact on cultural heritage and community identity is fundamentally flawed, as it overlooks the West Lewis coastline's significance as a living cultural landscape that interlinks environment, language, tradition, and community. By adopting a narrow perspective, the application treats heritage as a collection of isolated, static features instead of recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming of the assessment is its inadequate 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; however, they are mischaracterised as static features. This neglect of their ongoing use and significance leads to an incomplete understanding of cultural effects and dismisses their importance to community life.

Additionally, the assessment fails to account for intangible cultural heritage, such as the Gaelic language and the traditions that have fostered a deep connection between the community and the coastal environment. These vital components are essential to the area's identity yet are conspicuously absent from the assessment, highlighting a considerable oversight. Without recognising these elements, it is impossible to fully comprehend the cultural impact of the proposed development.

Concerns regarding community rights and engagement further complicate the situation. The Gaelic-speaking population embodies a distinct cultural identity, akin to that of Indigenous Peoples, yet the lack of Free, Prior and Informed Consent processes undermines the assessment's validity. This failure to engage meaningfully with the community compromises the integrity of the evaluation and neglects established participatory principles concerning cultural and environmental matters.

Moreover, the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018, represents a critical procedural failure. This assessment is essential for the competent authority to meet its legal obligation to assess social, cultural, and economic impacts on the island community. Its omission alone precludes a lawful determination.

From a policy standpoint, these shortcomings directly conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage and the failure to acknowledge living cultural practices constitute a significant deviation from established policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and adherence to statutory obligations leads to a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not furnish a sufficient foundation for evaluating the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is fundamentally lacking, with insufficient transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the complete report has not been made public. This represents a considerable evidential gap that hinders both public understanding and the competent authority's ability to assess the full scope of social risks highlighted by the developer's own

research.

Summaries available indicate that residents are currently facing significant stress, anxiety, and concern due to the proposal's scale and proximity. These consequences arise from direct community engagement and are thus grounded in reality rather than speculation. However, the absence of the full assessment restricts proper examination of these findings and limits the determination of their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal threatens community identity and cohesion, with "cultural loss" identified within the developer's own findings. Despite this, these social impacts have not been adequately included in the main application or given the necessary weight in considerations. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. It is critical to have a comprehensive understanding of social, economic, and health impacts for developments of this magnitude, especially when community character and functioning may be at risk. The failure to provide the full dataset means that the application does not present a complete evidential basis necessary for evaluating the balance between benefits and harms.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. Development must not only support positive health outcomes but also avoid causing harm; however, the available evidence points to existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be established.

The procedural implications are substantial, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This is a significant omission within the application and represents a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, combined with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information for consideration.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines in close proximity to the West Lewis coastline threatens to fundamentally alter the area's character, which is defined by its open Atlantic horizon and a strong sense of remoteness. This industrial presence would result in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, as it

does not adequately reflect the scale of change or the sensitivity of the receiving environment.

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

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

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

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

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

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

Overall, the assessment inadequately represents the extent of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. Unfortunately, the application does not adequately demonstrate how these essential uses and habitats will be safeguarded against significant disruption. The assessment of fisheries and marine life is lacking, failing to provide a thorough evaluation of the ecological or socio-economic impacts.

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

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

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

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

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

The deficiencies in the assessment, particularly concerning fishing displacement, underestimation of acoustic impacts, and internal inconsistencies, render it incomplete and unreliable. These shortcomings impede a robust evaluation of the impacts on marine life and fisheries.

TOURISM

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

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

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

In an island community where economic diversification is limited, the failure to properly evaluate tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been considered, contravening the requirements set out under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impacts and the necessity of showing a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking the necessary evidence for the competent authority to thoroughly assess the economic repercussions of the proposal.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a failure to meet the standards of sustainable development. This proposal does not address the statutory duties, national policy, or evidential standards required. It echoes the issues from the 2008 refusal of the Lewis Wind Power proposal, as the industrial scale remains

unacceptable. Although the current application falls under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still lacks necessary support.

Significant gaps in baseline data are evident, alongside the use of an undefined design envelope. There is an overreliance on unspecified mitigation measures, and essential impact pathways are omitted. This includes nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are present as well. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018. Furthermore, not disclosing the full Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

Additionally, the proposal conflicts with National Planning Framework 4. It does not sufficiently protect biodiversity, natural places, or cultural heritage. There is a lack of evidence showing that health and wellbeing impacts are acceptable, and it fails to demonstrate a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts from offshore and onshore components have not been accurately assessed, leaving the effects on peatlands, carbon balance, habitats, and crofting land unclear.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to rule out adverse effects has not been achieved, invoking the precautionary principle and hindering lawful conclusions regarding acceptable impacts.

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

Considering these issues, the application is procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks prevents a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or exercise regulatory provisions to demand the missing information.

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

Additional Comments

This is a grave mistake on the grounds of environmental and health recklessness. In time if it goes ahead it will be looked on as such and then scrapped and vast amounts of compensation will need to be paid making the whole thing an expensive folly. No consideration is given to the health of the local population and wildlife or it would never have been proposed. I worry for my health and that of my family and neighbours.

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: DB7670EA

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and its accompanying documents has revealed significant deficiencies in material planning, environmental considerations, cultural impacts, and procedural compliance. The development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, nearly pristine environment, and rich cultural identity. There are fundamental concerns about the compatibility of the proposal's scale, proximity, and design with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis necessary for a lawful determination. There are critical gaps in environmental data, and the baseline information provided is limited and inconsistent. Furthermore, key aspects of the proposal remain undefined. The use of a flexible design framework obscures a clear understanding of the likely significant effects, while reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are not substantiated by robust evidence.

There are evident and substantial conflicts with policy. The proposal appears to diverge from the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests for consent and undermine the capacity of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal introduces large turbines positioned in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental repercussions. Collectively, the insufficiency of information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a full, transparent, or reliable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty undermines the integrity of the assessment and hinders a consistent application of a worst-case scenario. Consequently, the impacts outlined may not correspond to the actual development, leaving both the public and the competent authority without a clear understanding of the true extent of environmental effects.

Consent is sought based on the reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach defers essential information to post-consent stages, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such procedural deficiencies contravene the intentions of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly established before any determination.

Moreover, there are critical evidential shortcomings, including gaps in baseline data and limitations in methodology, alongside a reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of impacts, particularly as conclusions of negligible or non-significant effects are presented without robust supporting data. The insufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is inconsistent with statutory requirements.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is fundamentally flawed, revealing significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. Situated on the west coast of the Isle of Lewis, an area known for its internationally important seabird populations, the proposed development fails to adequately demonstrate that these species, many of which are already in decline, will

not face adverse effects. Critical foraging areas and migratory pathways are located within the development site, yet the assessment does not thoroughly evaluate the risks of displacement, collision, or habitat loss.

There exists a glaring contradiction in the application. While the developer asserts there will be no significant adverse effects, they simultaneously put forth a Habitats Regulations derogation case, which should only be necessary where significant harm is anticipated. This inconsistency raises serious concerns about the assessment's reliability, suggesting that the conclusions drawn are unsupported by the evidence provided. Furthermore, there is a lack of sufficient evidence to conclude that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment does not fully account for the critical importance of these feeding grounds, and the reliance on modelling methods creates uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. Methodological shortcomings may lead to an underestimation of mortality, especially in areas where baseline data is lacking and where the behavioural responses of species are not comprehensively understood.

The placement of turbines within a recognised migratory corridor introduces a substantial risk, acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of sustained mortality in this corridor and the potential impacts on species that possess relatively small global populations. From a regulatory standpoint, the application does not meet the evidential standards necessary to affirm no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and limitations in modelling means the standard of being beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle, preventing a lawful conclusion that supports consent.

Moreover, the identified deficiencies represent a failure to adhere to National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally 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 lack of robust evidence. As a result, it ultimately fails to meet the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage associated with the West Lewis coastline is fundamentally deficient, neglecting to recognise it as a dynamic cultural landscape wherein environment, language, tradition, and community are deeply intertwined. The approach taken in the application is overly simplistic, reducing heritage to mere static assets and failing to acknowledge their ongoing social, cultural, and spiritual relevance within the community.

Particularly problematic is the handling of significant cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These are not just historical markers; they serve as active burial grounds and places of spiritual significance. However, the assessment mistakenly categorises these sites as static features, overlooking their contemporary use and the implications of development on their surroundings. This lack of understanding leads to an inadequate evaluation of cultural impacts, disregarding the vital role these sites play in community life.

Moreover, there is a striking absence of consideration for intangible cultural heritage. Elements such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment are essential to the area's identity but are missing from the assessment. This omission represents a critical gap, as understanding the cultural impact of the proposed development necessitates the inclusion of these factors.

Concerns also arise regarding the rights and involvement of the community. The Gaelic-speaking population embodies a unique cultural identity and possesses characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken, which undermines the validity of the assessment and fails to adhere to the established principles of community participation in decisions that affect cultural and environmental interests.

A significant procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority's ability to fulfil its legal obligation to evaluate the social, cultural, and economic repercussions on the island community. This alone renders any determination unlawful.

From a policy standpoint, the aforementioned deficiencies put the proposal at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and sites. The failure to engage with both tangible and intangible heritage, alongside the neglect of living cultural practices, clearly deviates from policy obligations.

In summary, the failure to adequately assess living heritage, the value of intangible cultural aspects, community rights, and compliance with statutory requirements leads to a considerable evidential gap. The cultural repercussions of the proposed development have not been thoroughly evaluated, and the application falls short of providing a solid foundation for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The inadequacy of the assessment concerning social impacts, health, and wellbeing is evident, particularly in terms of transparency necessary for a lawful evaluation. The developer has engaged in a Social Impact Assessment, which included focus groups with local residents, but the full report remains unpublished. This absence of information creates a considerable evidential gap, hindering both public understanding

and the competent authority's ability to grasp the full range of social risks highlighted in the developer's own research.

Summaries that are available suggest that residents are already facing quantifiable stress, anxiety, and concern linked to the scale and closeness of the proposed development. These effects are based on direct engagement, indicating they are not mere speculation. However, without the full assessment, proper scrutiny of these findings is impossible, limiting the capacity to evaluate their significance during the decision-making process.

Moreover, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" specifically noted in the developer's findings. Despite the recognition of these impacts, they have not been adequately incorporated into the primary application nor afforded the necessary consideration. The lack of disclosure surrounding the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency has further repercussions for the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this nature, especially where community character and functioning might be affected. By failing to provide the complete dataset, the application does not present a full evidential basis for weighing the benefits against the potential harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments are required to foster positive health outcomes and avoid detriment; however, the available evidence highlights existing negative effects that have not been fully revealed. Without access to the complete assessment, the application cannot prove compliance with this policy.

The procedural implications of this situation are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation due to the lack of access to the full Social Impact Assessment. This constitutes a material omission within the application, resulting in a failure to satisfy the evidential requirements stipulated by the Environmental Impact Assessment regime.

Collectively, the failure to disclose the complete Social Impact Assessment, alongside evidence of existing adverse effects, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly inadequate and does not accurately reflect the scale of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon,

undeveloped nature, and profound sense of remoteness. Introducing large-scale turbines near the shoreline would result in a continuous and imposing industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application fails to adequately represent the extent of this visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity, diminishing the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact, especially within such a sensitive landscape.

There are also critical methodological issues regarding how visual viewpoints have been selected and presented. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and landscapes of high value. This raises concerns that the visual impact may have been understated, which undermines the credibility of the assessment.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape interconnected by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated entities rather than acknowledging their interdependence, leading to an incomplete analysis 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 severing their connection to the natural horizon. This issue represents not only a visual impact but also a broader cultural and spatial harm that has not been sufficiently addressed within the application.

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

Lastly, 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 change is, therefore, fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation.

In conclusion, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and

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

CONSTRUCTION AND POLLUTION RISKS

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

This reliance on unspecified future measures raises substantial concerns, particularly given the sensitivity of the local environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on strategies for prevention, control, or monitoring of these issues.

There is also significant uncertainty surrounding the scale and behaviour of sediment plumes that could result from seabed disruption and cable installation. Without thorough modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

Furthermore, the absence of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are in place to manage pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures effectively at the point of determination.

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application does not sufficiently demonstrate that these vital uses and habitats can be safeguarded or maintained without experiencing significant disruption. A primary concern is the assumption that fishing activity can be displaced without adverse effects. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of sustaining additional pressure. This omission is critical, as displacement may lead to overfishing in other areas and could have broader economic repercussions for the local fishing fleet. The impacts on fisheries and local livelihoods cannot be adequately assessed without a clear, evidence-based evaluation.

Moreover, the proposal presents substantial 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 disturb marine life over considerable distances, affecting species such as dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application diminishes the importance of these effects without sufficient evidence to support such a claim.

Furthermore, the application acknowledges the necessity of licenses to permit harm to European Protected Species, yet simultaneously describes the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, determining the overall impact on marine ecosystems and socio-economic conditions is unfeasible.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus precluding 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 collectively render the assessment incomplete and unreliable. These shortcomings impede a robust evaluation of the impacts on marine life and fisheries.

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 application lacks an assessment of dark skies and nocturnal wildlife, which is a significant omission in the Environmental Impact Assessment. The coastline of West Lewis features exceptionally dark skies that contribute to environmental quality, cultural identity, and tourism. However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive light effect across the western horizon, fundamentally changing the night-time environment.

There is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important as dark skies play a critical role in the area's identity and the growth of sectors like astro-tourism. The absence of this analysis creates a clear gap in the overall landscape and environmental assessment.

Moreover, impacts on nocturnal wildlife have not been evaluated. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and increased risk of collision. The application fails to include any assessment of lighting impacts or phototaxis studies, meaning the potential effects on these species and the risk of increased mortality remain unexamined.

This issue is further complicated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data leaves a critical gap in understanding ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites would face adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, which invokes the precautionary principle and impedes a lawful determination.

From a policy standpoint, this omission goes against National Planning Framework 4 concerning the protection of natural places and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time is an essential part of the environment.

Overall, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unsuitable for lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, especially when evaluated against statutory duties, national policy, and evidential standards. It echoes the core issues

that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Presenting the project now under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing does not address these persistent concerns.

There are significant gaps in the baseline data, and the application relies on an undefined design envelope, which raises questions about the reliability of the evidential basis for determination. The proposed mitigation measures remain unspecified, while crucial impact pathways—such as those affecting nocturnal wildlife, the complete onshore infrastructure, and potential tourism effects—have been omitted. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, there are evident failings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the failure to provide the full Social Impact Assessment is a significant omission. Such deficiencies obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

Furthermore, the proposal stands in direct conflict with National Planning Framework 4. It does not adequately demonstrate protection of biodiversity, natural areas, or cultural heritage. There is no evidence of acceptable health and wellbeing impacts, and the absence of tourism impact modelling fails to provide proof of a net economic benefit. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks presented remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes contradictory. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The myriad information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct any lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or utilise the relevant regulatory provisions to demand the submission of the missing information.

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

Additional Comments

I strongly object

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: 740E85AC

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 regulations. A review of the Environmental Impact Assessment Report and accompanying documentation has revealed significant deficiencies in planning, environmental considerations, cultural implications, and procedural adherence. The development is proposed off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project, particularly regarding its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application does not provide an adequate evidential basis necessary for a lawful determination. Important environmental data is absent, and the baseline information is both limited and inconsistent, leaving many key elements of the proposal undefined. The flexible design framework utilised inhibits a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures means that their potential effectiveness cannot be accurately assessed. Consequently, the documentation fails to facilitate a full or informed understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not underpinned by robust evidence.

There exist substantial conflicts with established policy. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly in regards to biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and undermine the competent authority's capacity to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines situated near the shoreline, raises significant concerns related to landscape capacity, visual dominance, and environmental impact. When considered collectively, the lack of sufficient information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, or trustworthy overview of the potential environmental repercussions of the proposal. The employment of a flexible Project Design Envelope, which lacks a commitment to precise turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty hampers a consistent assessment based on worst-case scenarios, thereby compromising the integrity of the evaluation. As a result, the potential impacts outlined may not accurately represent the development that will ultimately be realised, leaving both the public and the competent authority unaware of the true magnitude of the environmental effects.

The application leans significantly on mitigation strategies, monitoring plans, and management approaches that remain undefined. Consent is being sought under the assumption that any environmental damage will be addressed later, which hinders any substantial evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of crucial information until after consent is granted is procedurally unacceptable and contradicts the essential aims of the Environmental Impact Assessment process, which mandates that significant potential effects and mitigation measures should be clearly established before any determination can be made.

There are also marked evidential shortcomings, encompassing gaps in baseline data, methodological limitations, and a reliance on assumptions rather than specific site-related evidence. This leads to uncertainties regarding both the scale and significance of the impacts, particularly where conclusions suggest negligible or non-significant effects without robust supporting information. The lack of adequate data obstructs a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential standards outlined in the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal falls short of demonstrating alignment with the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is not possible to confirm that impacts have been thoroughly evaluated or that suitable safeguards have been established.

Overall, the dependence on an unspecified design envelope, the lack of defined mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies prevent a lawful and rigorous assessment of environmental effects, resulting in the competent authority being unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough assessment of alternatives, which does not fulfil the requirements of the Environmental Impact Assessment regime. Instead of offering a reasoned and structured comparison of viable alternatives based on their environmental effects, it provides a narrative of project development that does not convincingly show that less harmful options have been identified, assessed, and chosen over more damaging ones.

There is a notable absence of a transparent, evidence-based evaluation of different offshore locations, scales of development, and design configurations. Specifically, the application fails to illustrate that the developer has genuinely considered positioning the turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitive nature of the West Lewis coastline and the critical role that proximity to shore plays in determining impacts, the lack of such analysis means that no conclusion can be drawn about whether the proposed siting is the least damaging option.

This inadequacy also applies to the assessment of cable routing and landfall. There is insufficient evidence to suggest that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant locations such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis indicate that the design process did not incorporate mitigation by design, instead relying heavily on post-design mitigation measures.

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

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a critical omission that contributes to the overarching 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 within the West Lewis coastal environment is substantially inadequate. This area is characterised as a biologically active marine system, yet the baseline data provided is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of relevant species. Consequently, the assessment lacks a reliable evidential basis necessary for evaluating potential impacts.

A significant gap exists concerning otters, a species protected under European law, where their active utilisation of coastal areas for foraging and movement has not been adequately acknowledged or assessed. The failure to consider their core foraging range and behavioural patterns leads to an insufficient evaluation of the potential impacts stemming from construction activities, noise, and increased human activity. Such omissions compromise the conclusions regarding the absence of significant effects on the otter population.

Further issues emerge in the evaluation of basking sharks, as the reliance on aerial surveys introduces a considerable detection bias, particularly given the conditions prevalent in the Atlantic. This methodology is likely to result in an underestimation of their presence, especially in light of established land-based observations that indicate frequent use of these waters. Neglecting to incorporate or adequately consider this data contributes to an incomplete baseline and diminishes the credibility of the assessment's conclusions.

These methodological deficiencies mean that the conclusions asserting negligible or non-significant effects are founded on assumptions rather than solid evidence. Additionally, the lack of comprehensive baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This creates uncertainty regarding the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify or assess the protected species involved. The uncertainty generated by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

In conclusion, the assessment's reliability is fundamentally undermined by incomplete baseline data, flawed methodologies, and unsupported conclusions. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, collectively suggesting that the application lacks a robust evidential foundation.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the essential criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application revisits the fundamental issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal does not adequately address these critical concerns.

Significant gaps in baseline data and the continued use of an undefined design envelope undermine the reliability of the application. Additionally, it relies on unspecified mitigation measures and omits essential impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, obstructing a comprehensive understanding of potential significant effects or residual impacts.

There are notable procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment is a material omission. These deficiencies hinder the competent authority from accurately assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, failing to illustrate the protection of biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore elements has not been adequately evaluated, obscuring implications for peatlands, carbon balance, habitats, and crofting land.

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

The industrialisation proposed would lead to substantial and irreversible alterations to a highly sensitive landscape. The impacts on the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and negative effects on tourism will create permanent changes that cannot be mitigated to an acceptable degree.

In summary, the application is both procedurally and substantively unsuitable for determination. The multitude of information deficiencies, combined with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the necessary regulatory provisions to mandate the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 82A4C20F

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 inadequate and fails to provide a complete, transparent, or trustworthy assessment of the potential environmental impacts of the proposal. The reliance on a flexible Project Design Envelope, which lacks

commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of specificity undermines the integrity of the assessment, resulting in a scenario where the impacts discussed may not accurately represent the development that will be constructed. Consequently, both the public and the competent authority are left without a true understanding of the environmental effects involved.

Furthermore, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed later hinders any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to stages following consent is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before any determination.

Significant evidential deficiencies also exist, including gaps in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not fulfil the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully evaluated or that appropriate safeguards are in place.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment surrounding community identity and cultural heritage is fundamentally flawed, neglecting to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. This application adopts an overly simplistic viewpoint, treating heritage merely as a collection of isolated, static elements rather than recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and spiritual sites, yet the assessment portrays them as fixed features, overlooking their ongoing significance, usage, and the potential impact of development on their surroundings. This oversight leads to an incomplete understanding of cultural implications and dismisses their importance in community life.

Moreover, the application neglects to consider intangible cultural heritage, which encompasses the Gaelic language, traditions, and the long-standing bond between the community and the coastal environment. These elements are vital to the identity of the area, yet they are entirely omitted from the assessment, which represents a considerable gap. Without examining these factors, one cannot fully comprehend the cultural impact of the proposed development.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population possesses a unique cultural identity, characterised by recognised traits of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of genuine engagement undermines the credibility of the assessment and neglects established principles of participation regarding cultural and environmental decisions.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot meet its legal obligation to assess the social, cultural, and economic repercussions on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and spaces. The failure to consider both tangible and intangible heritage, alongside the lack of recognition for living cultural practices, signifies a clear deviation from policy requirements.

Ultimately, the combined failure to adequately evaluate living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural ramifications of the proposed development have not been thoroughly evaluated, leaving the application lacking a solid foundation for assessing the genuine cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is significantly inadequate and does not 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is significantly inadequate and does not take into account the complete range of impacts resulting from this integrated development. The offshore turbines and onshore works are closely interrelated, yet they are evaluated separately, leading to a fragmented approach that obscures the true extent of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland and the construction of a substation in proximity to Stornoway, as well as the necessary access infrastructure through delicate landscapes. These activities entail excavation across deep peat areas, particularly in Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. Without a thorough assessment of these impacts, there is no comprehensive understanding of the project's overall environmental footprint.

The decision to exclude or postpone the assessment of onshore impacts hampers the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process necessitates that all elements of a project be considered in conjunction; however, the distinct assessment of offshore and onshore components results in a lack of clarity regarding the combined effects on peatlands, habitats, and local communities.

There are also considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The current application fails to show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been taken, indicating a significant evidential gap in relation to biodiversity protection.

Concerns about carbon balance are also pertinent. Disturbing peatland has the potential to release stored carbon, which could lead to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter nor does it prove that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. There is no evidence provided in the application that the requisite consents or processes have been initiated, which brings into question the project's feasibility and lawful implementation.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed as it does not meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, specifically regarding the unacceptable scale of industrialisation. This new application is presented under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet fails to address these essential elements.

The evidential basis for determining the application is incomplete and unreliable. There are significant gaps in baseline data, and the proposal relies on an undefined design envelope and unspecified mitigation measures. Key impact pathways, such as those concerning nocturnal wildlife, onshore infrastructure, and tourism, have been omitted. As a result, the Environmental Impact Assessment is inadequate, preventing a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty established under the Islands (Scotland) Act 2018. Additionally, not disclosing the full Social Impact Assessment represents a serious omission. These issues hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

In direct violation of National Planning Framework 4, the application fails to protect biodiversity, natural areas, and cultural heritage. It does not adequately 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 impacts of both offshore and onshore components have not been thoroughly assessed, leaving effects on peatlands, carbon balance, habitats, and crofting land obscured.

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

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

In conclusion, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, along with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A4235918

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 informed by a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant planning, environmental, cultural, and procedural deficiencies.

The development's location off the west side of the Isle of Lewis is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposed development, which call into question its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined. The use of a flexible design framework obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures leaves their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, the proposal exhibits clear and substantive conflicts with existing policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that it meets national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent, undermining the competent authority's ability to deem the development acceptable under policy considerations.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, introduces significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of inadequate information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle is warranted.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency regarding the environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions or configurations, creates significant uncertainty. This compromises the assessment's integrity and obscures the true environmental impacts, making it difficult for both the public and the competent authority to grasp the full extent of the effects.

The application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Consequently, consent is sought on the premise that environmental harm will be resolved later, which impedes a meaningful evaluation of their effectiveness and the assessment of residual impacts. This postponement of crucial information to post-consent stages is not procedurally acceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly outlined before a decision is made.

Furthermore, there are considerable evidential deficiencies, including gaps in baseline data and methodological limitations, alongside a reliance on assumptions rather than site-specific evidence. These issues contribute to uncertainty about the scale and significance of impacts, especially where claims of negligible effects are made without substantial supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that cannot align with statutory requirements.

As a result, the application does not meet the evidential criteria set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not align with National Planning Framework 4, particularly its stipulations on biodiversity protection and environmental integrity, since it is unclear whether the impacts have been thoroughly assessed or if appropriate safeguards are established.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, treating the West Lewis coastline merely as a collection of isolated, static assets rather than recognising it as a vibrant cultural landscape where environment, language, tradition, and community intertwine. This reductive approach overlooks the ongoing social, cultural, and spiritual roles that these heritage elements play within the community.

Particularly concerning is the inadequate treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places of spiritual significance, yet the assessment characterises them as static features, ignoring their continued use and the implications of development on their context. This mischaracterisation leads to an incomplete understanding of the cultural effects and dismisses their importance in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the community's deep-rooted relationship with the coastal environment. These aspects are essential to the area's identity, yet they are entirely omitted from the evaluation, representing a significant gap. Without recognising these factors, the true cultural impact of the development remains unclear.

There are additional concerns regarding community rights and the lack of engagement. The Gaelic-speaking population, recognised as possessing a distinct cultural identity akin to that of an Indigenous People, has not been involved in a process of Free, Prior and Informed Consent. This absence of genuine participation undermines the legitimacy of the assessment and fails to uphold established principles of inclusion in decisions affecting cultural and environmental matters.

A significant procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination legally deficient.

From a policy standpoint, these shortcomings position the proposal in direct conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with living cultural practices, clearly diverges from established policy requirements.

Overall, the combined failure to evaluate living heritage, intangible cultural value, community rights, and statutory requirements creates a significant evidential gap. The cultural impacts of the development have not been appropriately assessed, and the application fails to establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The application significantly lacks the necessary transparency regarding social impacts, health, and wellbeing, rendering its evaluation materially deficient. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the complete report has not been made public. This withholding of information creates a critical evidential gap that hinders both the public and the relevant authorities from grasping the full extent of the social risks identified in the developer's own research.

From the summaries that are available, it is clear that residents are currently experiencing notable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and should not be dismissed as speculative. The lack of access to the full assessment restricts proper scrutiny of these findings and limits the capability to ascertain their significance in the decision-making process.

Moreover, there is a distinct perception among the community that this proposal threatens their identity and cohesion, with the developer's findings identifying "cultural loss." Nevertheless, such impacts have not been sufficiently integrated into the main application nor afforded the proper consideration they deserve. By not disclosing the full Social Impact Assessment, the true human and social costs of the development remain obscured.

This absence of transparency detrimentally impacts the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health consequences is crucial for developments of this magnitude, particularly when the character and function of the community may be at stake. The application, lacking the full dataset, fails to present a robust evidential foundation for weighing the benefits against the harms.

On a policy level, the application falls short of demonstrating compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, the evidence presented indicates adverse effects that have not been fully revealed. Without access to the complete assessment, it is impossible to ascertain compliance with this policy.

The procedural ramifications are significant, as the competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential standards set forth by the Environmental Impact Assessment framework.

Ultimately, the failure to disclose the full Social Impact Assessment, coupled with the evidence of existing adverse impacts, renders the evaluation incomplete and unreliable. This situation hinders a lawful determination and underscores that the application is unsupported by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, landscape, and seascape is significantly lacking, failing to accurately capture the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon and its undeveloped nature, which contributes to a strong sense of remoteness. The planned large-scale turbines, situated close to the shoreline, would impose a continuous industrial presence, fundamentally altering this unique character and

leading to a permanent transformation of the landscape.

The visual change represented in the application is not sufficiently detailed. Given the scale and proximity of the turbines, they are likely to dominate views from residential areas, historic locations, and popular coastal sites. This dominance would adversely affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning significant cultural heritage sites and high-value landscapes. This limitation raises the possibility that the visual impact has been understated, thus questioning the reliability of the assessment.

Additionally, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage adequately. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the wider landscape, sharing visual and spatial connections to the Atlantic horizon. The assessment fails to consider these sites as interdependent assets, leading to an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape threatens to sever these vital connections, transforming the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This issue is not limited to visual impacts but also encompasses broader cultural and spatial damages, which the application has not properly addressed.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which aims to protect natural spaces and historic assets. The proposed scale of change contradicts the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment further challenges any claims of policy adherence.

Ultimately, the impacts identified are not capable of being effectively mitigated. Due to the turbines' scale, height, and proximity, their presence will be dominant and unavoidable. Therefore, the resulting changes are fundamental and permanent, beyond the possibility of being lessened to acceptable levels through mitigation efforts.

In conclusion, the assessment does not accurately depict the scale of the impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and confirm that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to adequately assess construction and pollution risks, resulting in an incomplete evaluation of likely environmental effects. It proposes significant seabed preparation and installation works in a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on future mitigation and contingency measures to be created after consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly troubling given the sensitivity of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail on prevention, control, or monitoring strategies.

Furthermore, 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, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to the potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

The absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders evaluation of whether adequate safeguards are in place to respond to pollution incidents. This situation introduces procedural risk 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 contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent, and the lack of such information means that a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation measures, detailed management plans, and uncertainty about potential impacts culminate in a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application remains incomplete.

TOURISM

The application overlooks the critical assessment of tourism impacts, failing to evaluate the economic and social implications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Despite the application noting that 86% of visitors are attracted by scenery, it lacks a quantified analysis of how large-scale offshore

infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced considerable growth, increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and the potential loss of environmental quality could affect Tourism Gross Value Added or the wider economic resilience of the area. Without such vital analysis, it remains unclear whether the proposed development would yield a net economic benefit or potentially harm an established and expanding sector.

Furthermore, the assessment neglects to address the importance of environmental quality in enhancing tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, creating a substantial gap in understanding the impacts on a recognized and growing aspect of the local economy.

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

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

Collectively, the shortcomings in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and considering the island's economic dependency lead to a significant evidential gap. This hinders a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory obligations, national policy, and evidential benchmarks. It echoes the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was determined, yet it is now introduced under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential foundation for determination, characterised by critical gaps in baseline data, the use of an undefined design

envelope, unspecified reliance on mitigation measures, and omissions regarding key impact pathways, including nocturnal wildlife, full onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Moreover, clear procedural failures are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, and the failure to disclose the full Social Impact Assessment is 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.

The proposal conflicts directly with National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural areas, and cultural heritage. It does not establish that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative impacts of both offshore and onshore elements have not been adequately assessed, leaving effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and inhibiting a lawful conclusion regarding the acceptability of impacts.

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

When considering these factors collectively, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or invoke relevant regulatory provisions to demand the submission of the missing information.

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

Additional Comments

I grew up on the west side of Lewis and my family home is still there. We don't have the infrastructure to support the work, our mental health will be affected. Villagers go down

to the shore seeking peace and enjoying the wild environment we have grown up with. My grandfather built our family home with stones from the shore. We have been winkle picking, we have played here. We want to pass on this beautiful place to future generations. It will be the bigger heartbreak and cause irreversible damage to all life 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: D3290F49

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and near-pristine environment, alongside a strong cultural identity. The scale and design of this proposal, particularly with the positioning of large turbines close to the shoreline, raise significant concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and essential components of the proposal remain undefined. The utilisation of a flexible design framework obscures the assessment of likely significant effects, while the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects, which are not supported by robust evidence.

Moreover, there are substantial policy conflicts present. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies relate directly to the statutory tests necessary for consent and compromise the competent authority's ability to affirm the development's acceptability within policy parameters.

The unprecedented scale of this proposal, combined with insufficient information, undefined mitigation measures, evidential deficiencies, and clear policy non-compliance, indicates that the application is incomplete and incapable of facilitating a lawful determination. In light of these issues, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a biologically active and highly sensitive marine system. However, the assessment of marine ecology and protected species presents significant deficiencies that undermine its reliability. The baseline data provided is incomplete, and the methodologies used do not adequately capture the

presence, behaviour, and habitat use of species within this critical area. Consequently, the assessment does not offer a sound evidential basis for evaluating potential impacts.

One major oversight pertains to otters, a species that is protected under European law. The application has not sufficiently recognised or assessed their use of coastal areas for foraging and movement. There is a notable lack of consideration given to their core foraging range and behavioural patterns, which means that the potential impacts from construction disturbances, noise, and increased activity have not been adequately evaluated. This gap in understanding compromises the conclusions regarding the absence of significant effects on this protected species.

Additionally, the assessment of basking sharks suffers from methodological shortcomings, particularly the reliance on aerial surveys that introduce considerable detection bias in challenging Atlantic conditions. This approach is likely to underestimate the presence of basking sharks in these waters, especially when contrasted with established observations from land that indicate their frequent use of the area. The failure to incorporate or adequately consider such data leads to an incomplete baseline, further weakening the reliability of the conclusions drawn.

The methodological flaws present in the assessment mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This creates 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, given that protected species have not been accurately identified or assessed. The uncertainty created by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its findings. The application is situated in key foraging areas and migratory pathways along the west coast of the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the application fails to

adequately demonstrate that these species will not be adversely affected.

There exists a critical contradiction within the application; the developer asserts that no significant adverse effects are anticipated while simultaneously advancing a case for Habitats Regulations derogation, a process triggered only when significant harm is expected. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by sufficient evidence.

Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not thoroughly acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly concerning species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given the incomplete baseline data and the unclear understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor poses an additional and significant risk, as it effectively creates a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impact 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, coupled with data gaps and limitations in modelling, means the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle and prevents a lawful conclusion that would support consent.

The deficiencies identified in the assessment also indicate a failure to comply with National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

In summary, these various shortcomings render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. Collectively, they hinder a robust evaluation of the impacts and contribute to the conclusion that the application does not satisfy the statutory requirements essential for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal lacks a thorough assessment of the seascape, landscape, and visual impacts, failing to adequately represent the scale of change and the sensitivity of the receiving environment. The character of the West Lewis coastline is marked by its open

Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would establish a continuous industrial presence that fundamentally alters this character, leading to a permanent transformation of the landscape.

There are serious concerns regarding the methodology used in 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 high-value landscapes. This suggests a risk of underestimating the magnitude of visual impact, which raises doubts about the reliability of the assessment.

The application fails to consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting intertwined with the Atlantic horizon. Treating these heritage assets as isolated, rather than recognising their interdependence, results in an inadequate evaluation of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4's commitment to safeguarding natural places and historic assets. The scale of the proposed changes is incompatible with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of policy compliance.

Additionally, it is evident that the identified impacts cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, unable to be reduced to an acceptable level through any form of mitigation.

Overall, the assessment is inadequate, failing to accurately represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings prevent a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This alteration to the night-time environment fundamentally

undermines the exceptionally dark skies characterising the West Lewis coastline, which are essential to the area's environmental quality, cultural identity, and tourism value.

The application does not assess the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This failure is particularly concerning given the significance of dark skies to the local identity and the emerging tourism sectors, such as astro-tourism. The lack of consideration of these impacts highlights a critical gap in the overall landscape and environmental assessment.

Equally alarming is the absence of an evaluation of impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can disorient them and increase their risk of collision. The application lacks a lighting impact assessment or phototaxis study, failing to examine how aviation lighting may affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment further compounds this omission, as it does not account for nocturnal activity or the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data leaves a critical void in understanding the ecological impacts of the proposal.

Without an assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites may be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be met. This engages the precautionary principle and hampers a lawful determination of the application.

From a policy standpoint, these omissions conflict with National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, they undermine the broader assessment of landscape and seascape impacts, as the night-time character is integral to the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed, failing to meet the requirements of sustainable development when evaluated against statutory duties and national policy. The application revisits the critical issues associated with the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. This new submission is made under a

more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the baseline data provided, and the proposal employs an undefined design envelope while depending on unspecified mitigation measures. It neglects to address key impact pathways, including effects on nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment remains incomplete, lacking the necessary information to fully understand likely significant effects or any residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to disclose the entire Social Impact Assessment is a notable omission. These flaws hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

In addition, the proposal is at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to confirm that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has not been conducted effectively, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and hindering a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal would lead to considerable and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and impacts on tourism present permanent effects that cannot be mitigated to an acceptable level.

Overall, the application is procedurally and substantively unfit for determination. The extensive deficiencies in information, combined with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. Therefore, the competent authority should either refuse consent on these grounds or invoke the necessary regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

The scale of this project will have a negative impact on our island landscape

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 03AD77AA

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 informed by a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant planning, environmental, cultural, and procedural deficiencies.

The development's location off the west side of the Isle of Lewis is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposed development, which call into question its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined. The use of a flexible design framework obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures leaves their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, the proposal exhibits clear and substantive conflicts with existing policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that it meets national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent, undermining the competent authority's ability to deem the development acceptable under policy considerations.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, introduces significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of inadequate information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle is warranted.

ASSESSMENT OF ALTERNATIVES

The proposed application lacks a comprehensive assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a clear, structured comparison of feasible alternatives based on their environmental impacts, it offers a narrative that merely outlines the project's evolution. This approach does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging solutions.

Moreover, there is a notable absence of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. In particular, the application does not show that the developer has genuinely considered the possibility of situating turbines further offshore, where visual, ecological, and coastal impacts could potentially be lessened. The sensitivity of the West Lewis coastline is critical, and the significance of proximity to shore in determining impact cannot be overstated. This lack of analysis makes it impossible to conclude that the proposed siting is indeed the least damaging option.

The inadequacies also apply to cable routing and landfall assessments. There is insufficient evidence suggesting that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The failure to provide a clear avoidance strategy, coupled with the absence of comparative analysis, indicates that the application has not adopted mitigation by design, relying instead on post-design mitigation measures.

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

From a policy standpoint, this shortcoming severely undermines adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a material omission that leads to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline features clean coastal waters and important habitats that are sensitive to disturbances and contamination. The assessment of construction and pollution risks associated with the proposed project is incomplete, lacking the necessary detail to properly evaluate the likely environmental effects. The proposal includes substantial seabed preparation and installation works within a high-energy 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 would be formulated after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

There are acknowledged risks in the application, such as sediment mobilisation and accidental chemical or oil spills, but it fails to provide enough detail on how these risks will be prevented, controlled, or monitored. Additionally, uncertainty surrounds the scale and behaviour of sediment plumes that may arise 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 potential effects on marine species and habitats that have already been identified as sensitive.

The absence of detailed emergency response procedures further complicates the issue. By postponing contingency planning until after consent, the application makes it impossible to evaluate whether proper safeguards are established to handle pollution events. This introduces 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 is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and required mitigations must be evaluated prior to granting consent; without this information, a lawful determination cannot be made. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient management plans, and uncertainties regarding potential impacts render the assessment materially deficient. These issues prevent a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. The current proposal is presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps in baseline data and the continued use of an undefined design envelope raise concerns regarding the evidential foundation for this application. The reliance on unspecified mitigation measures and the omission of critical impact pathways, such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects, contribute to an Environmental Impact Assessment that is incomplete. This lack of thorough analysis impedes a full understanding of the likely significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment is a material omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is inconsistent with the National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. It also fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, clouding the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and could be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold needed to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would cause substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and impacts on tourism would result in permanent effects that cannot be mitigated to a satisfactory level.

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

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

Additional Comments

This should not be visible from land in Lewis no need except greed

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: 0BFD688D

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 in accordance with marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies related to planning, environmental, cultural, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The proposal raises serious concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development due to its scale, proximity, and design.

The application lacks an adequate 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. Key components of the proposal remain unclear, and the flexible design framework employed hinders a proper assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures calls into question their effectiveness, rendering the documentation inadequate for a comprehensive understanding of the potential environmental, cultural, or community impacts. Consequently, assertions of negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are evident and substantial. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests essential for obtaining consent and impair the competent authority's ability to determine whether the development is policy-compliant.

The scale of the proposal is unprecedented for this location, as it includes large turbines positioned very close to the shoreline, which raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and reliability to adequately account for the environmental effects of the proposal. The flexible Project Design Envelope, which does not specify turbine dimensions or layouts, creates uncertainty and hampers the ability to evaluate worst-case scenarios. This compromises the assessment's integrity and obscures the true environmental impacts, limiting public understanding and oversight by the competent authority.

Moreover, the application heavily relies on yet-to-be-defined mitigation measures and management plans. Seeking consent based on the assumption that environmental damage will be rectified later hinders meaningful evaluation and understanding of potential residual impacts. This deferment of crucial information to post-consent stages is procedurally improper and undermines the purpose of the Environmental Impact Assessment, which mandates clear establishment of significant effects and mitigation before any determination.

There are also notable evidential gaps, including incomplete baseline data and methodological limitations, leading to reliance on assumptions rather than site-specific evidence. This uncertainty casts doubt on the scale and significance of impacts, particularly where claims of negligible effects are made without adequate supporting data. The lack of sufficient information compromises a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that conflict with statutory requirements.

As a result, the application does not satisfy the evidential standards set by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that adequate safeguards are implemented.

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

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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is fundamentally a living cultural landscape, where the environment, language, tradition, and community are closely intertwined. However, the assessment of cultural heritage and community identity in the application is fundamentally inadequate, as it treats heritage as isolated, static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

A significant shortcoming of the assessment is its handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet the assessment categorises them as static features, neglecting their continued use, significance, and the potential impact of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores their vital role in community life.

Moreover, the application fails to address intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the area's identity, yet they

are entirely omitted from the assessment, which constitutes a significant oversight. Without acknowledging these factors, it becomes impossible to fully understand the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which has a distinct cultural identity that aligns with recognised characteristics of Indigenous Peoples, has not been engaged in a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and disregards established principles of participation in decisions affecting cultural and environmental interests.

A further procedural failing is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community. This oversight alone renders a lawful determination impossible.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines close to the shoreline would create a dominant industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient and does not adequately reflect the magnitude of this change or the sensitivity of the receiving environment.

The application fails to fully represent how visual amenity would be impacted. The scale and proximity of the turbines mean that they would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This oversight erodes the defining qualities of naturalness and remoteness in the area. Furthermore, the methodology employed in selecting and presenting visual viewpoints raises significant concerns. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This may lead to an understatement of the visual impact, undermining the reliability of the assessment.

Another critical deficiency is the lack of assessment regarding the interconnectedness of landscape, seascape, and cultural heritage. Sites like 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 sites as isolated, ignoring their interdependence, which results in an incomplete understanding of the impacts on their cultural significance and setting. The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This constitutes not just a visual impact, but also a broader cultural and spatial harm that has not been sufficiently evaluated.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the protection of natural areas and historic assets. The scale of change is at odds with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further jeopardises claims of compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. This change is thus fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation. In conclusion, the assessment does not accurately depict the scale of impact, the environment's sensitivity, 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 proposal presents significant deficiencies in the assessment of construction and pollution risks, leading to an incomplete evaluation of potential environmental effects. It involves extensive seabed preparation and installation activities in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application suggests relying on future mitigation and contingency measures, which will be established after consent is granted. This approach hinders any meaningful assessment of their adequacy or effectiveness prior to approval.

The sensitivity of the receiving environment amplifies the issues associated with this reliance on undefined future measures. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies. Additionally, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the extent, duration, or ecological impacts of these

plumes cannot be determined, raising further concerns for sensitive marine species and habitats identified in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application obstructs the evaluation of whether suitable safeguards are in place to manage pollution events. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination. From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be evaluated before consent, and the lack of this information means a lawful determination cannot be achieved.

Ultimately, the combined absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts lead to a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment provided regarding fisheries and marine life lacks thoroughness and fails to deliver a strong evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these crucial habitats and uses can be safeguarded or sustained without causing significant disruption.

One primary concern lies in the assumption that fishing activities can be relocated without repercussions. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to absorb additional pressure. This omission is crucial, as the potential for displacement raises the risk of overfishing in other areas and could have broader economic ramifications for the local fishing fleet. An evidence-based assessment is essential to fully understand the impacts on fisheries and the livelihoods that depend on them.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling planned over an extended period is expected to disturb marine life over large areas, notably affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay the seriousness of these effects, lacking sufficient supporting evidence.

Additionally, there is a striking inconsistency in the application concerning the necessity for licences to permit harm to European Protected Species, even as such impacts are described as negligible. This contradiction undermines the credibility of the

assessment and raises substantial concerns regarding adherence to the Habitats Regulations, particularly where harm is expected to occur to a degree that requires legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is vital to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

The onshore components encompass cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of associated access infrastructure through ecologically sensitive landscapes. These activities involve excavating areas characterised by deep peat, particularly within Barvas Moor, which represents an important carbon store and ecologically delicate habitat. The current application lacks a thorough assessment of these effects, thus obscuring a complete understanding of the project's overall environmental footprint.

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

Moreover, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The

application has not sufficiently evidenced that the impacts on these habitats have been comprehensively evaluated or that suitable avoidance measures have been implemented, thereby creating a notable evidential gap with respect to biodiversity preservation.

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

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

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

Collectively, the fragmentation of project elements, the absence of a thorough assessment, and the lack of evidence concerning environmental and land use impacts render this portion of the application incomplete and unreliable, hindering a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the standards required for sustainable development, as assessed against statutory duties, national policy, and evidential criteria. It mirrors the 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 presented under a more robust policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and community wellbeing, the application lacks a reliable evidential foundation for its determination.

Critical deficiencies exist in the baseline data provided, and the reliance on an undefined design envelope raises significant concerns. Furthermore, the proposal does not adequately specify its mitigation measures and neglects key impact pathways such as nocturnal wildlife, the implications of the full onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects and residual impacts of the project.

Additionally, there are clear procedural violations evident in the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duties

outlined in the Islands (Scotland) Act 2018. Moreover, the failure to fully disclose the Social Impact Assessment is a critical omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, and cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. There is also a failure to show a net economic benefit, largely due to the lack of modelling regarding tourism impacts. The cumulative impacts of both offshore and onshore elements have not been thoroughly assessed, which obscures the potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold needed to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, preventing any lawful conclusion that impacts are acceptable.

Moreover, the proposal threatens to 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 relationships, and the negative impacts on tourism are all permanent effects that cannot be mitigated to an acceptable degree.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E9769131

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 marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. This development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

There is a concerning lack of adequate evidential support for a lawful determination within the application. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and key components of the proposal remain unspecified. The use of a flexible design framework complicates the assessment of likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive or informed understanding of the potential environmental, cultural, or community impacts, and claims asserting negligible or non-significant effects lack robust evidence.

The proposal is marked by clear and substantive conflicts with established policies. It is inconsistent 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. The application does not satisfactorily demonstrate adherence to national requirements for protecting biodiversity, climate considerations, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and weaken the competent authority's ability to deem the development acceptable within policy frameworks.

The unprecedented scale of this proposal, with large turbines located close to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information presented, reliance on undefined mitigation strategies, evident evidential weaknesses, and clear policy non-compliance, it is apparent that the application is incomplete and incapable of facilitating a lawful determination. Under these circumstances, the precautionary principle must be 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.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally inadequate, lacking a thorough and dependable understanding of the ecological receptors present in this sensitive marine area. The baseline data is insufficient, and the methodologies employed do not effectively capture the presence, behaviours, and habitat utilisation of various species.

Consequently, the assessment fails to establish a credible evidential basis for understanding potential impacts.

Particularly concerning is the oversight regarding otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active usage of coastal regions for foraging and movement. This oversight neglects critical factors such as their core foraging range and behavioural patterns, leading to an inadequate assessment of the potential impacts stemming from construction activities, noise, and increased human activity. Such gaps significantly undermine any assertions regarding the lack of significant effects on this species.

Additionally, the assessment of basking sharks suffers from deficiencies, primarily due to an over-reliance on aerial surveys that introduce substantial detection bias, especially under Atlantic conditions. This methodological approach is likely to underreport the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent utilisation of these waters. The failure to integrate or properly consider such data culminates in an incomplete baseline, thus diminishing the reliability of the conclusions drawn.

These methodological shortcomings result in findings of negligible or non-significant effects being based on conjectures instead of robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, encompassing seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the genuine level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment framework and National Planning Framework 4, given that protected species have not been sufficiently identified or evaluated. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, lawful consent cannot be granted.

In summary, the combination of insufficient baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These inadequacies obstruct a thorough evaluation of the potential impacts on marine ecology and protected species, leading to the overarching conclusion that the application is devoid of a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and lacks the necessary evidential support to demonstrate that it will not adversely affect the internationally important seabird populations found along the west coast of the Isle of Lewis. This region is home to many seabird species that are already in decline, and the application fails to adequately address the implications of potential displacement, collision risk, or habitat loss within key foraging areas and migratory pathways.

There is a significant contradiction within the application itself, as it asserts that there will be no significant adverse effects while simultaneously putting forth a Habitats Regulations derogation case. Such a case is only applicable when significant harm is anticipated, thus raising concerns about the credibility of the assessment and the validity of its conclusions. The evidence presented does not convincingly establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. Moreover, the critical importance of these feeding grounds has not been thoroughly assessed, and the modelling approaches used introduce considerable uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding of behavioural responses.

The placement of turbines within a known migratory corridor poses an additional significant risk, as it effectively obstructs a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to confirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and modelling deficiencies, means that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby precluding a lawful conclusion in favour of consent. Furthermore, the identified deficiencies are indicative of non-compliance with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The inability to establish that internationally important seabird populations will remain unaffected directly conflicts with national policy.

Overall, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These issues undermine a robust evaluation of the impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline should be recognised as a living cultural landscape, where environment, language, tradition, and community are intricately linked. However, the assessment of cultural heritage and community identity in the application is inadequate, adopting a simplistic view that treats heritage as isolated and static, rather than acknowledging its ongoing social, cultural, and spiritual functions within the community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These active burial sites, vital for spiritual

practices, are inaccurately categorised as static features, neglecting their continued use and the potential impacts of development on their settings. This oversight leads to an incomplete evaluation of cultural effects, disregarding their importance in community life.

Moreover, the assessment fails to consider intangible cultural heritage, such as the Gaelic language and local traditions, alongside the community's long-standing connection to the coastal environment. These elements are central to the area's identity but are entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population represents a distinct cultural identity, akin to that of an Indigenous People; yet, the absence of a process for Free, Prior and Informed Consent undermines the credibility of the assessment. This lack of meaningful engagement does not align with established principles of participation in decisions affecting cultural and environmental interests.

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

From a policy standpoint, these deficiencies conflict directly with National Planning Framework 4, especially regarding the preservation of historic assets and places. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, represents a clear departure from policy standards.

Overall, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory obligations result in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not provide a sound basis for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the social impacts, health, and wellbeing associated with the proposed development raises serious concerns regarding the application's validity. A commissioned Social Impact Assessment involved local residents through focus groups; however, the full report has not been made available. This omission results in a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research.

Available summaries reveal that residents are currently facing tangible stress, anxiety, and concerns due to the scale and proximity of the proposal. These impacts are not

speculative, as they stem from direct engagement with the community. Nevertheless, the failure to disclose the complete assessment restricts meaningful scrutiny of the findings, limiting the capacity to gauge their significance in the decision-making process.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this recognition, these critical impacts have not been adequately incorporated into the main application, nor have they been given the necessary weight in deliberations. The withholding of the full Social Impact Assessment consequently obscures the true human and social costs that could arise from the development.

This lack of disclosure not only undermines the Environmental Impact Assessment process but also prevents a comprehensive understanding of the social, economic, and health implications of such a large-scale development, particularly regarding its effect on community character and functioning. The absence of the full dataset means the application fails to provide a complete evidential basis for balancing potential benefits against harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and avert harm, yet the available evidence points to existing adverse effects that remain inadequately disclosed. Without the complete assessment, compliance with this policy cannot be confirmed.

Procedurally, the implications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission in the application and fails to satisfy the evidential requirements of the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, along with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This inadequacy hinders a lawful determination and underscores the conclusion that the application is unsupported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would fundamentally change this character, creating a continuous and dominant industrial presence that would lead to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, failing to reflect the scale of change or the sensitivity of the receiving environment.

The application does not adequately convey the magnitude of the visual change. The

turbines' scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. Methodological concerns arise regarding the selection and presentation of visual viewpoints, which may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, diminishing the assessment's reliability.

Another significant oversight is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated assets, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This represents a broader cultural and spatial harm that has not been sufficiently assessed. From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any claims of policy compliance.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation. Collectively, these deficiencies in the assessment fail to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, reinforcing the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate and lacks the necessary detail to evaluate potential environmental effects. The proposal involves significant seabed preparation and installation works in a challenging Atlantic environment. However, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would be formulated after consent, hindering any meaningful assessment of their suitability or effectiveness.

This reliance on unspecified future measures is particularly alarming due to the sensitivity of the local environment. The West Lewis coastline features clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental spills of chemicals or oil, it does not provide adequate details on how

these risks will be prevented, controlled, or monitored.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes generated from seabed disturbances and cable installations. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these disturbances. This uncertainty also extends to potential impacts on marine species and habitats that have been identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures adds to these concerns. By postponing contingency planning until after consent, the application fails to allow for the evaluation of whether appropriate measures are in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment framework. Significant effects and mitigation must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. The application also does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application under review fails to adequately protect or maintain these critical habitats and uses, leading to significant concerns regarding ecological and socio-economic impacts. The assessment of fisheries and marine life is lacking, particularly in its evaluation of fishing displacement, which is presumed to occur without consequence. There is no evidence presented that alternative fishing grounds are accessible or can sustain additional pressure, a significant oversight that raises the risk of overfishing and potential economic fallout for the local fleet.

Moreover, the proposal poses considerable risks to marine species, especially due to underwater noise from construction activities. The high-energy hammer piling anticipated over an extended duration is likely to disturb marine life across vast distances, impacting species such as dolphins. Concerns have been raised about the predicted disturbance affecting a substantial part of the local bottlenose dolphin population, yet the application downplays the significance of these effects without adequate supporting evidence.

The application also reveals contradictions, acknowledging the necessity for licences for any harm to European Protected Species while simultaneously characterising the impacts as negligible. This inconsistency undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly where potential harm is identified that may warrant legal authorisation.

Cumulative impacts resulting from habitat disturbance, noise, and the displacement of fishing activities have not been sufficiently evaluated. The lack of a comprehensive assessment of these combined effects leaves the overall implications for marine ecosystems and socio-economic conditions unclear.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate how the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, precluding any assertion that the proposal constitutes sustainable development.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies compromise the reliability of the assessment, thereby obstructing a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal's separation of offshore turbines and onshore works results in a materially incomplete assessment, failing to fully account for the integrated nature of the project. This fragmented approach obscures the true scale of the environmental and socio-economic impacts, as the onshore elements, which include cabling across protected moorland and the construction of a substation near Stornoway, are not adequately assessed alongside their offshore counterparts.

Significant concerns arise from the construction activities, particularly the excavation across areas of deep peat within Barvas Moor. This region is a crucial carbon store and ecologically sensitive habitat, yet the application lacks a comprehensive evaluation of these impacts. Consequently, it prevents an accurate understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together, and the current separation hampers a complete understanding of the combined impacts on peatlands, habitats, and local communities.

Sensitive habitats, including machair systems and peatland environments, face significant risks that are not fully addressed. The application does not adequately demonstrate that impacts on these protected areas have been assessed or that suitable avoidance measures have been implemented, which highlights a clear

evidential gap regarding biodiversity protection.

Furthermore, the disturbance of peatland raises serious concerns about the carbon balance. Disturbing these areas releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application provides insufficient detail on this matter or assurance that the overall carbon balance remains favourable.

The routing of infrastructure through active croft land presents additional challenges, introducing potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, thereby raising questions about the deliverability and lawful implementation of the project.

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

In summary, the division of project components, the lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts culminate in an incomplete and unreliable application, hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

This critical omission is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the

associated risks. Kittiwakes, for example, may forage or migrate at night and are similarly vulnerable to disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

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

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is deeply concerning and should be refused in its entirety. It demonstrates significant deficiencies that make it unfit for determination. There are critical gaps in baseline data, which undermine the reliability of the evidence presented. The proposal relies on an undefined design envelope and mitigation measures that are unspecified, while also omitting key impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment lacks completeness and fails to provide a comprehensive understanding of the likely significant effects and residual impacts.

Additionally, procedural failures are evident throughout the application. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a full Social Impact Assessment is a material omission that prevents a thorough evaluation of the impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application insufficient for a competent authority to assess.

The proposal also stands in direct conflict with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Furthermore, it fails to show that impacts on health and wellbeing are acceptable, and there is an absence of tourism impact modelling to evidence a net economic benefit. The cumulative impacts of both offshore and onshore elements have not been properly assessed, obscuring effects on peatlands, carbon balance, habitats,

and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent within themselves. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been met. This situation calls for the application of the precautionary principle, which prevents a lawful conclusion that the impacts are acceptable.

Moreover, the proposal threatens 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 negative impacts on tourism would lead to permanent effects that cannot be adequately mitigated.

In summary, the combination of information deficiencies, policy conflicts, and unresolved environmental risks indicates that the application is both procedurally and substantively unfit for determination. The competent authority must refuse consent based on these grounds or invoke the necessary regulatory provisions to require the submission of 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: 2E064F94

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

Dear Sir/Madam

This letter is a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and supporting documents, highlighting material deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. It contains missing critical environmental data, and the baseline information provided is limited and inconsistent. Key aspects of the proposal are not clearly defined. The flexible design framework inhibits a clear understanding of likely significant effects, while unspecified mitigation measures prevent any assessment of their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not backed by robust evidence.

There are clear policy conflicts evident in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests for consent and hinder the competent authority's ability to conclude that the development is acceptable in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The reliance on undefined project parameters creates a situation fraught with uncertainty, undermining the credibility of the Environmental Impact Assessment Report. Without specific turbine dimensions, layouts, or configurations, it is impossible

to apply a consistent worst-case scenario, leaving significant gaps in understanding the potential environmental effects of the development. This lack of commitment to detail prevents both the public and the competent authority from grasping the true extent of the impacts, which is vital for informed decision-making.

Moreover, the application is heavily dependent on unestablished mitigation measures, monitoring strategies, and management plans, which cannot be evaluated at this stage. Seeking consent with the expectation that environmental harm will be addressed later is procedurally unacceptable. This approach conflicts with the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly outlined prior to any determination.

The report exhibits significant evidential shortcomings, including notable gaps in baseline data and methodological limitations. These deficiencies result in a reliance on assumptions rather than site-specific evidence, leading to uncertainty about the scale and significance of the impacts. Conclusions that suggest negligible or non-significant effects lack robust supporting data, which is essential for a clear understanding of cumulative and worst-case scenarios. Such scientific uncertainty cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, it does not demonstrate compliance with the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity. The absence of a comprehensive assessment of impacts and adequate safeguards further exacerbates these concerns.

In summary, the deficiencies stemming from an undefined design envelope, lack of specified mitigation, and insufficient baseline data culminate in an Environmental Impact Assessment Report that is unreliable and incomplete. These significant shortcomings hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a well-informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development's assessment of marine ecology and protected species is significantly flawed, leading to an unreliable understanding of ecological receptors within the West Lewis coastal environment. This area is recognised as a biologically active and sensitive marine system. However, the baseline data provided is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable gap in the assessment concerns otters, which are classified as a European

Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the possible effects of construction disturbance, noise, and increased activity have not been sufficiently evaluated. Such shortcomings undermine any claims about the absence of significant effects on otters.

Additionally, the assessment of basking sharks presents further deficiencies. The reliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions, which likely leads to an underestimation of their presence. This is particularly evident when comparing the aerial survey results with established land-based observations that indicate frequent use of these waters. The failure to include or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological limitations present throughout the assessment mean that assertions of negligible or non-significant effects are based on assumptions rather than on robust evidence. Furthermore, the lack of sufficient baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as there has been inadequate identification and assessment of protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a flawed ornithological assessment, characterised by significant gaps in evidence and internal inconsistencies that undermine its overall conclusions. 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 demonstrate convincingly that these species will not be adversely affected. Turbines are proposed within critical foraging areas and migratory pathways, yet the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

A key contradiction arises within the application, as the developer claims there are no

significant adverse effects while simultaneously making a case for Habitats Regulations derogation, which is typically required only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that its conclusions are not firmly backed by the available evidence. Furthermore, the assessment lacks sufficient evidence to ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not comprehensively addressed, and the reliance on modelling techniques adds uncertainty, particularly for species such as Kittiwakes and Fulmars that are in severe decline. The applied methodologies are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor introduces an additional and considerable risk, as it effectively creates a barrier within 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 sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle and prevents a lawful conclusion supporting consent.

The identified deficiencies also indicate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is fundamentally unreliable due to internal inconsistencies, methodological flaws, and inadequate evidence. These issues impede a thorough evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to adequately consider the West Lewis coastline as a living cultural landscape, where environment, language, tradition, and community are interconnected. The application adopts a simplistic view of heritage, treating it merely as a collection of isolated and static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A significant oversight is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are classified as static features, neglecting their

continued use and importance as well as the impact that development may have on their surrounding environment. This mischaracterisation leads to an inadequate assessment of cultural effects and overlooks their vital role in community life.

Moreover, the application does not address intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are essential to the area's identity and are conspicuously missing from the assessment, which constitutes a significant omission. Without acknowledging these factors, the cultural implications of the development remain poorly understood.

Further issues arise concerning community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that is recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot properly fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This single omission prevents a lawful determination.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, clearly diverges from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the development have not been sufficiently evaluated, and the application does not offer an adequate basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding its social impacts, health, and wellbeing, as the evaluation provided is materially deficient and lacks the necessary transparency for a lawful assessment. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of the social risks identified in the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by available summaries. These impacts arise from direct engagement with the community and are therefore not speculative. However, without access to the complete assessment, proper scrutiny of these findings is unattainable, limiting the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with references to “cultural loss” emerging from the developer's findings. Unfortunately, these critical impacts have not been adequately considered in the main application, nor have they been given the appropriate weight they deserve. The failure to disclose the entire Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning may be at stake. The absence of the complete dataset means that the application does not present a thorough evidential basis to assess the balance of benefits and harm.

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

The procedural implications of this situation are considerable. The competent authority is unable to carry out a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This inadequacy obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, which is essential to its undeveloped character. The proposal for large-scale turbines in close proximity to the shoreline would result in a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible transformation of the landscape.

The magnitude of visual change associated with this application is inadequately

represented. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not fully capture the sensitivity of key cultural heritage sites or the worst-case scenarios, particularly concerning high-value landscapes. This raises the risk of underestimating the magnitude of visual impact, which undermines the reliability of the assessment.

Furthermore, there is a notable deficiency in assessing the interconnectedness of landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape context linked to the Atlantic horizon. The assessment treats these heritage assets in isolation rather than recognising their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital connections, disrupting how heritage assets are experienced in relation to the natural horizon. This represents not only a significant visual impact but also broader cultural and spatial harm that has not been adequately assessed.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant shortcomings in its assessment of construction and pollution risks, which ultimately hinders the ability to thoroughly evaluate likely environmental effects. It involves extensive seabed preparation and installation works in a dynamic Atlantic environment, yet lacks comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on

mitigation and contingency measures that are intended to be developed after consent is granted, thereby obstructing any meaningful assessment of their potential adequacy and effectiveness.

This reliance on undefined future measures is particularly troubling considering the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges potential risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the prevention, control, or monitoring of these threats.

Moreover, there remains uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have been recognised as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application precludes any evaluation of whether appropriate safeguards are in place for responding to pollution incidents. This introduces procedural risk and undermines 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. Significant effects and mitigation must be evaluated before consent, and the lack of necessary 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 clearly defined mitigation measures, inadequate management plans, and uncertainty surrounding potential impacts render the assessment materially deficient. These deficiencies impede a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding the impacts on fisheries and marine life is inadequate and fails to present a thorough evaluation of both ecological and socio-economic consequences. The waters along the West Lewis coast are home to a diverse marine ecosystem and a vibrant fishing industry. However, the application does not adequately demonstrate how these activities and habitats can be preserved or maintained without significant disruption.

A notable concern is the presumption that fishing activities can simply be shifted

without repercussions. The application does not provide any evidence that alternative fishing grounds exist, are accessible, or can handle increased pressure. This gap is crucial, as the risk of overfishing in other areas could arise, potentially leading to broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, understanding the effects on fisheries and livelihoods remains incomplete.

Furthermore, the proposal presents significant risks to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling for extended durations is expected to create disturbances over considerable distances, impacting species such as dolphins. The predicted disruption to a large segment of the local bottlenose dolphin population raises important issues, yet the application minimizes the seriousness of these effects without adequate supporting evidence.

There is also a striking inconsistency within the application, as it acknowledges the necessity of licences for any harm to European Protected Species, while simultaneously describing those impacts as negligible. This contradiction undermines the trustworthiness of the assessment and raises issues related to adherence to the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal permission.

Additionally, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. 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 alignment with 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 consequences for marine biodiversity, which hinders the conclusion that the proposal embodies sustainable development.

When considered as a whole, the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment both incomplete and unreliable. These shortcomings impede a thorough evaluation of the repercussions for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is fundamentally lacking and does not take into account the full range of impacts from what constitutes a single integrated project. The offshore turbines are closely linked to the onshore works, yet they are assessed separately, leading to a disjointed approach that masks the true extent of environmental and socio-economic consequences.

The onshore components comprise cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. Excavation in areas of deep peat, especially within Barvas Moor, poses risks to a significant carbon store and ecologically sensitive habitat. The application falls short by failing to provide a detailed assessment of these impacts, which obstructs a full understanding of the project's overall environmental footprint.

By excluding or delaying the evaluation of onshore impacts, the application inhibits a proper assessment of cumulative effects. The Environmental Impact Assessment process requires that all aspects of a project be considered collectively. However, the disconnection between offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain unclear.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not show that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that runs counter to renewable energy development goals. The application fails to address this issue sufficiently or prove that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence that the necessary consents or processes have been started, leading to doubts about the feasibility and lawful execution of the project.

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

Overall, the separation of project components, lack of thorough assessment, and absence of evidence on environmental and land use impacts render this segment of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances. This creates a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. 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.

There is a significant absence of assessment regarding the impact of this lighting on

visual amenity, landscape character, and the experiences of residents and visitors. This gap is particularly notable given the growing importance of dark skies to local identity and emerging sectors such as astro-tourism. The Environmental Impact Assessment does not evaluate how the proposed lighting may affect these crucial aspects.

Equally concerning is the lack of evaluation regarding impacts on nocturnal wildlife. Several species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are highly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application does not provide a lighting impact assessment or phototaxis study, meaning it fails to consider how the proposed aviation lighting could affect these species or contribute to increased mortality.

Moreover, the reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity and related risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation due to artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a crucial gap in understanding potential ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been met, thus 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 places and environmental quality. It undermines the overall evaluation of landscape and seascape impacts since the night-time character is an integral aspect of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its ability to meet the requirements of sustainable development when evaluated against statutory duties and national policy. This application reiterates the critical issues that led to the refusal of the Lewis Wind Power proposal in 2008, which was rejected due to the unacceptable scale of industrialisation. The current proposal is presented under a policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it fails to address these concerns adequately.

The evidential foundation for the application is incomplete and unreliable, with significant gaps in baseline data and an undefined design envelope. Furthermore, it

relies on unspecified mitigation measures and neglects to consider crucial impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of potential significant effects and residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment is a violation of statutory obligations under the Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a significant failure. These inadequacies 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 contravenes the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It also fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been properly assessed, which obscures the consequences for peatlands, carbon balance, habitats, and crofting land.

Furthermore, environmental risks associated with the proposal remain uncertain and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to significant 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 negative impacts on tourism are permanent consequences that cannot be effectively mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The magnitude of informational deficiencies, coupled with policy inconsistencies and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, it is essential that the competent authority refuse consent for the Spiorad na Mara Offshore Wind Farm proposal in its entirety or invoke the relevant regulatory provisions to compel the submission of the missing information.

Additional Comments

In this day and age of restoring peat lands. How can you justify destroying 40 acres of class 1 peat at Arnish.

The wind turbines are not only extremely ugly in a place of onb but extremely detrimental to all sea life., and bird 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: 3D2DD743

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

Dear Sir/Madam

This letter represents a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The concerns stem from a review of the Environmental Impact Assessment Report, which reveals significant deficiencies in planning, environmental protection, cultural preservation, and procedural integrity. The proposed site is located off the west side of the Isle of Lewis, an area recognised for its stunning Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The proposal's scale and design, particularly its proximity to the shore, raise urgent questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

A critical issue with the application is the lack of a solid evidential basis for any lawful determination. Important environmental data has been omitted, baseline information is both limited and inconsistent, and vital aspects of the proposal remain undefined. This flexible design framework complicates the assessment of potential significant effects, while the unspecified mitigation measures leave their effectiveness unexamined. Consequently, the supporting documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are notable policy inconsistencies. 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 that it can satisfy national requirements to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests for consent and compromise the ability of the competent authority to assess the development's acceptability in terms of policy.

The unprecedented scale of this project, featuring large turbines situated near the shoreline, generates significant worries about landscape capacity, visual dominance, and overall environmental impact. When considering the combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it becomes evident that the application is incomplete and unfit for lawful determination. In light of these serious concerns, the precautionary principle must be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks the necessary transparency for a lawful evaluation of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, but the full report remains unpublished. This creates a significant evidential gap that inhibits both public understanding and the competent authority's ability to fully grasp the social risks identified through the developer's research.

Summaries of the assessment suggest that local residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are not mere speculation. However, the absence of the full assessment hinders proper scrutiny of these findings and restricts the ability to evaluate their significance in the decision-making process.

Additionally, the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's own findings. Despite this, such impacts have not been adequately integrated into the main application or given the appropriate consideration. Withholding the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the full dataset, the application does not present a complete evidential basis needed to assess the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to support positive health outcomes and mitigate harm; however, the available evidence suggests existing adverse effects that remain undisclosed. Without the complete assessment, demonstrating compliance with this policy is unfeasible.

The procedural implications are significant because the competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This inadequacy prevents a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary requirements for sustainable development. It does not align with statutory duties,

national policy, or evidential standards. This proposal repeats the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the extent of industrialisation. Although the current application is presented under a stronger policy framework, it still does not adequately address biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

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

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

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

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

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

Additional Comments

No benefit to the local community or economy. How could our natural environment and coastal rural identity be altered forever and there be no benefit to the community in the long term. Surely the island population should benefit more from this natural resource in some capacity as demonstrated with the wind turbine initiative in the village of Tolsta on the 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: 8653A308

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

Dear Sir/Madam

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

The application does not present a sufficient evidential basis for a lawful decision. It is marked by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The employment of a flexible design framework hinders a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures prevents an assessment of their efficacy. Consequently, the documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There exist pronounced and substantial conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

Moreover, the proposal's scale is unprecedented for this area, with large turbines located in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. When considering the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and evident policy violations, it is clear that the application is incomplete and cannot substantiate a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and does not deliver a complete, transparent, or reliable analysis of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to defined turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the application of a worst-case scenario. This deficiency undermines the assessment's integrity, resulting in a situation where the impacts outlined may not represent the actual development built. Consequently, both the public and the competent authority are left unable to grasp the true extent of the environmental effects.

The application leans significantly on mitigation measures, monitoring strategies, and management plans that remain unspecified. Seeking consent under the assumption that environmental harm will be addressed later obstructs a meaningful evaluation of their effectiveness or an assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations be clearly defined prior to determination.

There are also notable evidential shortcomings, including inadequate baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such gaps lead to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without solid supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, introducing a scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not meet the evidential standards established under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been thoroughly assessed or that suitable safeguards are in place.

When considered collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These flaws obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to reach a decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The proposed application lacks a comprehensive and evidence-based assessment of alternatives, failing to satisfy the statutory requirements set forth by the Environmental Impact Assessment regime. Rather than offering a structured comparison of realistic alternatives based on their environmental implications, the application merely narrates the project's evolution. This narrative approach does not establish that less harmful

options have been properly identified, evaluated, and chosen in favour of more damaging solutions.

Moreover, the application does not provide a transparent comparison of alternative offshore sites, development scales, or design configurations. Notably, it does not demonstrate that the developer has adequately explored the possibility of placing turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. Considering the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact, the lack of such analysis precludes any conclusion that the proposed siting is the least damaging option available.

These shortcomings extend to the evaluation of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly considered to minimise impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, along with a lack of comparative analysis, indicates a failure to apply mitigation by design, resulting in a reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been adequately minimised through careful site selection, layout, and infrastructure routing. This represents a deviation from the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more appropriate alternatives are available. Without a robust assessment of alternatives, it is impossible to conclude that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents an assessment of marine ecology and protected species that is materially deficient, failing to deliver a complete and reliable understanding of ecological receptors within the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system; however, the baseline data is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat use. Consequently, there is no sound evidential basis for evaluating potential impacts.

One significant oversight involves 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. The core foraging range and behavioural patterns of otters have not been properly considered, meaning that the potential impacts of construction

disturbance, noise, and increased activity remain inadequately assessed. This lack of consideration undermines the conclusions drawn regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks suffers from further deficiencies. The reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is particularly evident when compared to established land-based observations which indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions provided.

Due to these methodological limitations, the conclusions of negligible or non-significant effects rest on assumptions rather than robust evidence. Moreover, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This uncertainty clouds the true scale of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally unreliable, marked by significant gaps in evidence and internal contradictions that call into question its conclusions. The west coast of the Isle of Lewis hosts internationally important seabird populations, many of which are already experiencing decline. However, the application fails to provide the necessary evidential standard to demonstrate that these species will not face adverse impacts. The turbines are proposed within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss are not adequately evaluated.

A critical inconsistency arises within the application, wherein the developer asserts that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, a mechanism that is only invoked when significant harm is anticipated. This contradiction undermines the reliability of the assessment and suggests that the conclusions drawn lack support from the underlying

evidence. Furthermore, the assessment does not adequately demonstrate that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not sufficiently recognised, and reliance on modelling approaches introduces considerable uncertainty, especially for species that are severely declining, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is incomplete and behavioural responses of the birds are not fully understood.

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

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

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

In conclusion, the assessment is characterised by internal inconsistency, methodological weaknesses, and insufficient evidence. These deficiencies hinder a thorough evaluation of potential impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly concerning the West Lewis coastline, which is a living cultural landscape where environment, language, tradition, and community are interconnected. The application treats heritage as isolated and static rather than recognising its ongoing social, cultural, and spiritual significance within the community.

There is a significant deficiency in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active burial and spiritual places, yet they are mischaracterised as static features. This approach neglects their continued use and meaning, which impacts the understanding of development effects on their setting.

Additionally, the assessment overlooks intangible cultural heritage, including the

Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are essential to the area's identity, yet they are completely absent from the evaluation, which is a major omission. Without accounting for these factors, the cultural impacts of the proposed development cannot be fully understood.

There are also important concerns regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity recognised as part of Indigenous Peoples, but the absence of a Free, Prior and Informed Consent process undermines the validity of the assessment. This lack of meaningful engagement does not align with established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural flaw is the lack of an Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is necessary for the competent authority to evaluate the social, cultural, and economic effects on the island community. Its absence alone renders a lawful determination impossible.

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

The overall result is a significant evidential gap due to the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations. The cultural impacts of the development have not been adequately evaluated, and the application lacks sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment represents a significant evidential gap that undermines the evaluation of the proposed development. The developer engaged local residents through focus groups, yet the complete report remains unpublished. This lack of transparency obstructs both public understanding and the competent authority's ability to fully grasp the social risks highlighted in the developer's own research.

Residents are already reporting measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not speculative. However, without access to the full assessment, there is inadequate scrutiny of the findings, which limits the assessment of their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with findings indicating potential "cultural loss" that have not been adequately considered in the main application. The failure to fully integrate these impacts

diminishes the acknowledgment of the true human and social costs associated with the development.

The withholding of the full Social Impact Assessment compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health implications is crucial for developments of this magnitude, particularly when they may impact community character and functioning. By not providing the entire dataset, the application lacks a complete evidential basis for balancing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, existing adverse effects, which have not been fully disclosed, suggest a failure to meet this requirement. Without the complete assessment, adherence to this policy cannot be validated.

The procedural implications of this situation are profound. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission is a significant shortfall within the application and fails to satisfy the evidential demands of the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly lacking and does not adequately capture the degree of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would create a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to represent the extent of the visual change. Given their scale and closeness, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct impact on visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not convey the level of this impact or its significance within the context of such a sensitive landscape.

There are also concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the viewpoints may not fully reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural

heritage sites and valued landscapes. This raises the possibility that the visual impact may have been understated, undermining the assessment's reliability.

Additionally, the assessment does not consider the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape connected through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated, rather than acknowledging their interdependence, which leads to an incomplete evaluation 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 not just a visual impact but also a more extensive cultural and spatial harm that has not been sufficiently evaluated within the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of change is inconsistent 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 claim of compliance with policy.

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

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of the 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 this proposal is insufficient and lacks the necessary detail to properly evaluate the potential environmental impacts. The project entails significant seabed preparation and installation activities within a challenging Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be developed after consent has been granted, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on vague future measures is especially troubling given the fragile nature of the surrounding environment. The West Lewis coastline is home to pristine coastal

waters and crucial habitats that are susceptible to disruption from sediment and contamination. While the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it falls short in providing adequate details on how these incidents will be prevented, managed, or monitored.

Additionally, there is ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without rigorous modelling and clearly articulated management strategies, it remains impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also extends to the effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application does not allow for the evaluation of whether adequate safeguards are in place to respond to pollution incidents. This introduces a procedural risk and compromises the ability of the competent authority to properly assess environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the mandates of the Environmental Impact Assessment regime. Significant likely effects and mitigation strategies must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents serious deficiencies in its assessment of fisheries and marine life, failing to deliver a comprehensive evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the application does not demonstrate the ability to protect or maintain these habitats and uses without causing significant disruption.

A notable flaw in the application is the assumption that fishing activity can be relocated without adverse effects. There is no evidence provided to confirm that alternative fishing grounds exist, are accessible, or can bear the additional fishing pressures. This significant omission could lead to overfishing in alternative areas and could have broader economic repercussions for the local fishing fleet. An absence of a clear, evidence-based assessment hampers the understanding of potential impacts on

fisheries and local livelihoods.

Additionally, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is expected to cause disturbances over large distances, impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming; yet the application downplays these effects without adequate supporting evidence.

There is an evident contradiction within the application, which acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously asserting that impacts are negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially in areas where anticipated harm necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

By omitting or delaying the assessment of onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process requires all project components to be considered together. The separation of onshore and offshore elements obscures the combined impacts on peatlands, habitats, and local communities.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an evaluation of dark skies and nocturnal wildlife, which constitutes a significant evidential gap. The West Lewis coastline is renowned for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

This application fails to assess the impact of such lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to local identity and emerging tourism sectors, such as astro-tourism, this omission is particularly concerning. Furthermore, there is no evaluation of the impacts on nocturnal wildlife, including sensitive species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are affected by artificial lighting due to phototaxis. This can result in disorientation and increased collision risk. The absence of

a lighting impact assessment or phototaxis study means that there is no consideration of how aviation lighting may affect these species or contribute to mortality.

The ornithological assessment's reliance on daytime survey data fails to capture nocturnal activity and associated risks. Kittiwakes, which may forage or migrate at night, also face disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data leads to a critical gap in understanding the ecological impacts.

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

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the broader evaluation of landscape and seascape impacts, as night-time character is a vital component of the environment. Overall, the absence of any assessment of dark skies and nocturnal wildlife renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The application significantly underrepresents the potential impacts on tourism, a crucial sector for the Isle of Lewis economy. This area's tourism thrives on its wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. With 86% of visitors attracted by the scenery, the proposal does not provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has shown remarkable growth, with its contribution rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application neglects to model the potential effects of seascape industrialisation and the deterioration of environmental quality on Tourism Gross Value Added and the broader economic resilience of the region. Without such crucial analysis, it remains unclear if the proposed development would result in a net economic benefit or if it would jeopardise an already thriving sector.

Furthermore, the evaluation fails to account for the critical role that environmental quality plays in tourism, particularly regarding unspoiled landscapes and dark skies which are vital for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the effects on a recognised and growing segment of the local economy.

Considering the limited economic diversification within this island community, the oversight in assessing tourism impacts has broader implications for employment, local

enterprises, and community sustainability. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately examined, as required by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to 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 and does not furnish enough evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the economic dependency of the island culminates in a significant evidential gap. This deficiency hinders a comprehensive evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application brings forth the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was evident. Although the current application is presented under a more robust policy framework, it places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable and comprehensive evidential basis for determination is notably lacking in the application. Critical gaps exist in the baseline data, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Key impact pathways are omitted, including those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of significant effects or residual impacts.

Procedural inadequacies are also present. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations set out in the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a complete Social Impact Assessment constitutes a material omission. These gaps obstruct the competent authority from assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also exhibit internal inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, thus invoking the precautionary principle and preventing 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, the loss of dark skies, disruptions to cultural and visual relationships, and negative impacts on tourism represent enduring effects that cannot be mitigated to an acceptable degree.

In summary, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, along with 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 the relevant regulatory provisions to demand the submission of the missing information.

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

Additional Comments

I feel very strongly that Spiorad na Mara (SNM) is an affront to the island of Lewis, in all possible aspects. The very name, in Scottish Gaelic, is an insult, perporting to be an acknowledgement of local culture and heritage. SNM is foisted on the island with hardly any perceivable benefit in the short, medium or long-term. Whilst there may be an employment benefit for a few years in the construction phase, this will not be to the benefit of the local employment pool. Workers will be imported and housed temporarily, leaving at the end of the construction phase. These are not people who will be interested in adapting to our way of life.

The community benefit is risible, and is not even directed at Lewis alone. We will be left with an industrial wasteland for decades to come, which will destroy our unique wilderness factor (the Lewis Peatlands). Tourists don't come to the Outer Hebrides to marvel at whirling windturbines. We have a unique environment, with a strong sense of place and attachment, which people have been prepared to fight for. The impacts on sea and land are understated if they are known at all.

Spiorad na Mara is not the spirit of the sea. It is the fouling of the sea, and cannot be permitted to be built.

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: B7B6E37C

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and related documentation, highlighting significant deficiencies in planning, environmental protection, cultural considerations, and procedural integrity. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns about the proposal's scale, proximity, and design challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential basis for lawful determination. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent, and key elements of the proposal remain undefined. The flexible design framework employed hampers a comprehensive understanding of potential significant effects. Moreover, the proposed mitigation measures have yet to be detailed, leaving their effectiveness unassessable. Consequently, the documentation does not facilitate a complete or informed understanding of environmental, cultural, or community impacts, making the claims of negligible or non-significant effects unsubstantiated by robust evidence.

Substantial conflicts with policy are evident. 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 the health and wellbeing of the community. It fails to prove that national standards for protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to assess the development's acceptability in policy terms.

The scale of this proposal is unprecedented in this region, featuring large turbines in close proximity to the shoreline, which raises serious concerns about landscape capacity, visual dominance, and environmental impact. The lack of sufficient information, the reliance on unspecified mitigation measures, and evident policy non-compliance collectively indicate that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, adherence to the precautionary principle is essential.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises serious concerns due to significant gaps in evidence and contradictions that undermine its findings. There are internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline. However, the application fails to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located within the development site, yet the evaluation does not adequately consider the risks of displacement, collision, or habitat loss for these seabirds.

There is a crucial inconsistency within the application itself. The developer claims there will be no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction casts doubt on the credibility of the assessment and indicates that its conclusions lack the necessary evidence.

The assessment does not sufficiently establish 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 addressed, and the reliance on modelling introduces uncertainty, especially for species like Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate potential mortality, particularly where baseline data is insufficient and the behavioural responses of seabirds are not comprehensively understood.

The placement of turbines within a recognised migratory corridor poses an additional risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately assess the long-term consequences of sustained mortality within this corridor or the potential impact on species that have relatively small global populations.

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

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

Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues prevent a thorough evaluation of the impacts and lead to the conclusion that the application does not fulfil the statutory requirements essential for approval.

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

I'm against the industrialisation of our Island

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A02FE3F5

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under relevant marine licensing and Environmental Impact Assessment regulations. The objection arises from an examination of the Environmental Impact Assessment Report and associated documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. 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 rich cultural identity. Concerns about compatibility with statutory requirements, national policy, and sustainable development principles are paramount given the scale, proximity, and design of the project.

The application does not provide a sufficient evidential basis for a lawful determination. It is notable that critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal are undefined. The implementation of a flexible design framework obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures raises questions about their efficacy. Consequently, the documentation fails to offer a comprehensive understanding of the impacts on the environment, culture, or community, and assertions of negligible or non-significant effects lack solid evidence.

There are evident and substantial policy conflicts as the proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies directly challenge the statutory tests necessary for consent and hinder the competent authority's ability to deem the development acceptable within policy frameworks.

The scale of the proposal is unprecedented for this location, with large turbines proposed in close proximity to the shoreline, raising serious concerns about landscape capacity, visual dominance, and environmental impact. Taken as a whole, the lack of adequate information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy violations illustrate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report fails to provide a complete and reliable account of the likely environmental effects of the proposal. Significant uncertainty arises from the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This lack of commitment prevents a consistent application of a worst-case scenario, compromising the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the development that is ultimately built, limiting both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed later inhibits any meaningful evaluation of effectiveness or assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates a clear establishment of likely significant effects and mitigation prior to determination.

There are also substantial evidential gaps present, including inadequacies in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies generate uncertainty regarding the scale and significance of impacts, especially in instances where negligible or non-significant effects are concluded without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold needed under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to show that impacts have been fully assessed or that adequate safeguards are in place.

Overall, the combination of 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 preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a determination based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its impact on ornithological interests. The assessment presented is fundamentally flawed, exhibiting considerable gaps in evidence and inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to provide the required evidential assurance that these species will not be adversely affected. The turbines are positioned within key foraging areas and migratory pathways, yet the assessment does not thoroughly evaluate the implications of displacement, collision risk, or habitat loss.

A critical contradiction is evident in the application, as the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats

Regulations derogation case, which is necessitated only when 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 available evidence. Furthermore, the assessment does not adequately demonstrate that seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds has not been fully considered, and the reliance on modelling approaches introduces uncertainty, particularly for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed may likely underestimate mortality, especially given the incomplete baseline data and the lack of understanding of behavioural responses.

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

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

Moreover, the identified deficiencies reflect a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected 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 shortcomings hinder a robust evaluation of impacts and support the overall conclusion that the application does not fulfil the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking, failing to recognise the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are interconnected. The application employs a simplistic approach, viewing heritage as separate, unchanging assets instead of acknowledging their continuous 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 locations serve as active sites for burial and spiritual practice; however, the assessment characterises them merely as

static features, overlooking their ongoing use, significance, and the implications of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural impacts and neglects their importance in community life.

Moreover, the assessment does not address intangible cultural heritage, which includes the Gaelic language, traditions, and the longstanding connection between the community and its coastal environment. These aspects are vital to the area's identity but are completely omitted from the evaluation, representing a significant gap. Understanding the cultural impact of the development is impossible without considering these elements.

Additional concerns arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not undergone a process of Free, Prior and Informed Consent. The lack of meaningful engagement raises questions about the validity of the assessment and fails to align with established principles regarding participation in matters affecting cultural and environmental interests.

There is also a critical procedural shortcoming in the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone hampers lawful decision-making.

From a policy standpoint, these deficiencies directly contradict the National Planning Framework 4, particularly concerning the protection of historic sites and places. The neglect to consider both tangible and intangible heritage, as well as the failure to recognise living cultural practices, indicates a clear divergence from policy standards.

When considered collectively, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the development have not been appropriately evaluated, and the application fails to provide a solid foundation for assessing the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, conveys a strong sense of remoteness. The introduction of large-scale turbines in such close proximity to the shoreline would create a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts fails to adequately reflect the scale of this change and the sensitivity of the receiving environment.

The magnitude of visual change resulting from the proposed turbines is inadequately represented in the application. Their scale and proximity would dominate views from

residential areas, historic sites, and popular coastal locations, which would directly affect visual amenity and degrade the defining qualities of naturalness and remoteness. The assessment does not convey the level of impact or its significance in relation to such a sensitive landscape.

Moreover, there are concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This oversight raises the risk that the visual impact has been understated, thus compromising the reliability of the assessment.

Another critical deficiency is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated assets neglects their interdependence, resulting in an incomplete assessment of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these important connections, altering the experience of heritage assets and disrupting their relationship to the natural horizon. This not only represents a visual impact but also inflicts broader cultural and spatial harm that has not been properly considered in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The scale of change presented is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment further undermines claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. The changes they would bring about are fundamental and permanent, rather than reducible to acceptable levels through mitigation efforts.

In summary, the assessment fails to accurately capture the scale of impact, the environment's sensitivity, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the view that the proposal is incompatible with protecting this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant concerns regarding the assessment of construction and pollution risks, which is incomplete and lacks the necessary detail to evaluate potential environmental effects. It involves considerable seabed preparation and installation work within a high-energy Atlantic environment. However, there are no fully

developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that are to be prepared after consent, hindering any meaningful evaluation of their adequacy or effectiveness.

The reliance on unspecified future measures raises particular concerns in light of the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to sediment disturbance and contamination. Although the application acknowledges risks associated with sediment mobilisation and the potential for accidental chemical or oil spills, it fails to offer sufficient detail on the prevention, control, or monitoring of these risks.

There exists uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also applies to potential effects on marine species and habitats identified as sensitive in the broader assessment.

Further compounding these issues is the absence of detailed emergency response procedures. The decision to defer contingency planning until after consent prevents the evaluation of whether adequate safeguards will be in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures be assessed prior to granting consent. In cases where this information is absent, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents an inadequate assessment of fisheries and marine life, failing to provide a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal does not convincingly demonstrate that these vital habitats and activities can be preserved without significant disruption.

A critical concern is the erroneous assumption that fishing activities can be displaced without negative consequences. The application lacks any evidence to support the availability of alternative fishing grounds that are both accessible and capable of handling additional pressure. This significant oversight raises the risk of overfishing in other areas, potentially leading to broader economic repercussions for the local fishing fleet. An absence of a clear, evidence-based assessment leaves the impacts on fisheries and local livelihoods poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly through the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is expected to disturb marine life over large areas, including species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious alarms, yet the application diminishes the seriousness of these effects without adequate supporting evidence.

There exists a glaring inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously declaring such impacts to be negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

Additionally, the assessment neglects to consider the cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and fishing displacement. 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 establish that the proposed development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, hindering any determination of the proposal as sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, underestimation of acoustic impacts, and internal inconsistencies renders the assessment incomplete and unreliable. These shortcomings impede a thorough evaluation of the proposal's impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application regarding the project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to account for the interconnected nature of the offshore turbines and onshore works. These elements should be evaluated as a cohesive unit, as their separation obscures the true magnitude of their environmental and socio-economic impacts. The onshore works involve cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Such activities include excavation in areas of deep peat, particularly within Barvas Moor, which is

crucial both as a significant carbon store and as an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a complete understanding of the project's overall environmental footprint.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is characterised by exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the tourism sector. However, the Environmental Impact Assessment completely omits the assessment of dark skies and nocturnal wildlife, representing a significant gap. The proposal includes permanent red aviation lighting, which would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

This application does not address the impacts of the proposed lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area's identity and the emerging sector of astro-tourism,

this lack of assessment is particularly concerning. Furthermore, there is no evaluation of how this lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and increased collision risks. The absence of a lighting impact assessment or phototaxis study fails to address these crucial effects.

The reliance on daytime survey data in the ornithological assessment further complicates the matter, as it does not capture nocturnal activity or its associated risks. Species like Kittiwakes, which might forage or migrate at night, are vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission contradicts National Planning Framework 4, which pertains to the protection of natural places and environmental quality. It undermines the broader assessment of landscape and seascape impacts since night-time character is an integral part of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm starkly illustrates a significant failure to meet the principles of sustainable development, particularly when measured against statutory obligations, national policy, and evidential standards. Similar to the 2008 refusal of the Lewis Wind Power proposal, this application again highlights an unacceptable scale of industrialisation, yet it is now being put forward under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

The evidential basis for the proposal is incomplete and unreliable, with critical gaps evident in baseline data. The ongoing use of an unspecified design envelope, alongside unverified mitigation measures, further complicates matters. Notably absent are assessments of key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment lacks the thoroughness needed to fully understand potential significant effects or any residual impacts.

Moreover, there are notable procedural shortcomings within the application. The lack of a compliant Island Communities Impact Assessment constitutes a violation of the statutory duty under the Islands (Scotland) Act 2018. Additionally, the incomplete disclosure of the Social Impact Assessment represents a material omission that hinders a proper evaluation of the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inadequate for determination.

This proposal is also fundamentally at odds with National Planning Framework 4. It fails to provide adequate protections for biodiversity, natural landscapes, and cultural heritage, and does not demonstrate that health and wellbeing impacts are acceptable. Furthermore, it cannot substantiate a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed appropriately, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain unclear and potentially significant, as assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

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

In conclusion, the application as it stands is both procedurally and substantively unfit for determination. The scale of the deficiencies in information, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, it is imperative that the competent authority refuses consent on these grounds or invokes the appropriate regulatory provisions to compel the submission of the necessary information. A formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E35238DE

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

Dear Sir/Madam

This objection is a formal stance against the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment protocols. It arises from an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting numerous deficiencies across planning, environmental, cultural, and procedural aspects. Situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline and strong cultural identity, the proposed development raises serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

Fundamentally, the application is deficient in evidential support necessary for lawful determination. There is a significant lack of critical environmental data, with baseline information being both limited and inconsistent. Moreover, essential elements of the proposal are inadequately defined. The flexible design framework used undermines the ability to assess likely significant effects, while the unspecified mitigation measures render any evaluation of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidential backing.

There are notable policy conflicts that raise alarm. 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 satisfactorily demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such discrepancies undermine the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the proposal's acceptability from a policy perspective.

The unprecedented scale of this proposal, with large turbines placed in close proximity to the shoreline, exacerbates concerns about landscape capacity, visual dominance, and environmental impact. Taken together, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear non-compliance with policy all indicate that the application is incomplete and unfit for lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several critical deficiencies that raise concerns about its reliability and transparency regarding the environmental effects of the proposed development. A significant issue is the adoption of a flexible Project Design Envelope, which lacks specific details about turbine dimensions, layouts, or configurations. This ambiguity introduces substantial uncertainty and hinders the ability to apply a worst-case scenario consistently. Consequently, the reported impacts may not accurately reflect the actual development, leaving both the public and the competent authority unable to fully comprehend the environmental implications.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its reliability. The development is situated within key foraging areas and migratory pathways on the

west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already declining. However, the application fails to prove to the necessary evidential standard that these species will not suffer adverse effects.

There are contradictions within the application itself. The developer claims that there will be no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency casts doubt on the assessment's reliability and highlights that the conclusions drawn are not backed by adequate evidence.

The assessment lacks sufficient evidence regarding the seabirds connected to protected sites such as the Lewis Peatlands and St Kilda. It does not fully account for the significance of these feeding grounds and relies heavily on modelling approaches that introduce uncertainty, particularly for species facing severe declines like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially since the baseline data is incomplete and the behavioural responses of these species are not thoroughly understood.

The placement of turbines within a recognized migratory corridor adds a significant risk, creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impact on species with limited global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold required to affirm that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, combined with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby hindering a lawful conclusion in favour of consent.

Moreover, the identified deficiencies signify non-compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will remain unaffected directly conflicts with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological flaws, and lack of evidence. These issues impede a thorough evaluation of impacts and substantiate the conclusion that the application does not satisfy the statutory requirements essential for 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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts associated with the proposed turbines is significantly inadequate, failing to accurately capture the scale of change and the sensitivity of the West Lewis coastline. This area is characterised by its unspoilt

Atlantic horizon, natural landscape, and a profound sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a pervasive industrial presence that would fundamentally change this character, leading to an irreversible transformation of the landscape.

The application does not effectively represent the extent of the visual changes anticipated. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts in the context of such a sensitive landscape.

Moreover, there are serious methodological issues concerning the selection and presentation of visual viewpoints. It appears that the chosen viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of visual impact has been understated, thereby compromising the assessment's reliability.

Another critical oversight is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, disregarding their interdependence, which results in a partial evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these important relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This not only represents a visual issue but also inflicts broader cultural and spatial damage, which has not been sufficiently evaluated in the application.

From a policy standpoint, this proposal contravenes the National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The extent of the proposed changes is inconsistent with the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further diminishes any claims of compliance with policy guidelines.

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

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and

heritage. These shortcomings hinder a reliable evaluation and strongly indicate that the proposal is incompatible with the necessary protections for this landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The coastline of West Lewis is noted for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change fundamentally impacts the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly important given the role of dark skies in the area’s identity and the growing sector of astro-tourism. The lack of consideration for these impacts creates a significant gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the effects on nocturnal wildlife, including species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, all of which are highly sensitive to artificial lighting due to their phototactic behaviour, leading to disorientation and a higher risk of collision. The application does not feature any lighting impact assessment or phototaxis study, which means it cannot evaluate how the aviation lighting may affect these species or increase mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposed development.

Without an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to rule out negative effects beyond reasonable scientific doubt cannot be satisfied, thus engaging the precautionary principle and hindering a lawful determination.

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

In summary, the lack of evaluation concerning dark skies and nocturnal wildlife constitutes a significant evidential gap. The absence of baseline data, impact

modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

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

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

Furthermore, the assessment neglects to consider how environmental quality underpins tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience, as well as emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this issue, leading to a substantial gap in understanding the effects on a vital and expanding segment of the local economy.

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

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current proposal is presented under a supposedly stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short in these areas.

Crucial gaps exist in the baseline data provided, alongside the use of an undefined design envelope and unspecified mitigation measures. The omission of key impact pathways, particularly concerning nocturnal wildlife, full onshore infrastructure, and tourism, further undermines the application. The Environmental Impact Assessment is incomplete, failing to allow for a comprehensive understanding of significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, breaching the statutory duty established under the Islands (Scotland) Act 2018. Furthermore, the lack of a full Social Impact Assessment represents a critical omission. These failings hinder the competent authority's ability to properly assess the implications for community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

In addition, the proposal is in direct conflict with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable, nor can it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore elements have not been adequately assessed, leaving concerns over effects on peatlands, carbon balance, habitats, and crofting land unaddressed.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also contain inconsistencies. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, along with policy conflicts

and unresolved environmental risks, obstruct any lawful, evidence-based decision. It is imperative that the competent authority refuse consent based on these grounds or invoke the necessary regulatory measures to mandate the submission of the missing information.

Accordingly, a formal request is made for the refusal of the Spiorad na Mara Offshore Wind Farm application 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: 9F6BEB26

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

Dear Sir/Madam

This letter is a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and supporting documents, highlighting material deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. It contains missing critical environmental data, and the baseline information provided is limited and inconsistent. Key aspects of the proposal are not clearly defined. The flexible design framework inhibits a clear understanding of likely significant effects, while unspecified mitigation measures prevent any assessment of their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not backed by robust evidence.

There are clear policy conflicts evident in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests for consent and hinder the competent authority's ability to conclude that the development is acceptable in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not deliver a full, transparent, or dependable account of the potential environmental effects associated with the proposal. The flexible Project Design Envelope employed in

the application, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty obstructs the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, hindering both public understanding and that of the competent authority regarding the true extent of the environmental effects.

Furthermore, the application is predominantly dependent on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be addressed at a later stage obstructs any substantial evaluation of the effectiveness of these measures or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable, contradicting the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

Additionally, there are significant evidential gaps, including deficiencies in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the magnitude and significance of impacts, especially in cases where negligible or non-significant effects are presented without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or appropriate safeguards implemented.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly deficient, failing to provide a complete and reliable understanding of the ecological receptors present. This area represents a highly sensitive and biologically active marine system, yet the baseline data collected is inadequate, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a

solid evidential foundation for evaluating potential impacts.

One major oversight pertains to otters, classified as a European Protected Species, which the application does not adequately recognise or assess regarding their active use of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns raises concerns, as the potential effects of construction-related disturbances, noise, and heightened activity have not been thoroughly evaluated. This significant omission undermines the conclusions drawn about the absence of serious effects on this species.

Additional shortcomings are evident in the evaluation of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The neglect to incorporate or adequately consider such pertinent data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions instead of robust evidence. The lack of sufficient baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This situation creates uncertainty about the actual level of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development lacks reliability due to significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate, to the necessary evidential standard, that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. Located within key foraging areas and migratory pathways, the development risks displacement, collision, and habitat loss, yet these implications are not robustly evaluated.

A critical inconsistency arises within the application itself, where the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation, which is applicable only when significant harm is anticipated. This contradiction casts doubt on the assessment's reliability and raises questions about the support provided by the underlying evidence. Furthermore, the assessment fails to adequately demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly considered, and the reliance on modelling approaches leads to uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed likely underestimate mortality, especially given incomplete baseline data and an insufficient understanding of behavioural responses.

Siting turbines within a recognised migratory corridor introduces further risk by creating a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not adequately consider the long-term implications of sustained mortality in this corridor or the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary 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 necessitates the application of the precautionary principle, precluding a lawful conclusion in support of consent.

These deficiencies indicate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal directly at odds with national policy. Collectively, the assessment's internal inconsistencies, methodological weaknesses, and lack of sufficient evidence prevent a thorough 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 West Lewis coastline has an open Atlantic horizon and an undeveloped character that contributes to a strong sense of remoteness. The proposal for large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally changing this character and leading to a permanent alteration of the landscape.

The application fails to represent the magnitude of the visual changes that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, thereby impacting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact on such a sensitive landscape.

Methodological issues are present in the selection and representation of visual viewpoints. Evidence suggests that the chosen viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises concerns that the true magnitude of visual impact may have been understated, which calls into question the reliability of the assessment.

There is also a failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This results in not just a visual impact, but a more extensive cultural and spatial harm that has not been properly assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change is not compatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further weakens any claims of compliance with policy requirements.

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

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

FISHERIES AND MARINE LIFE

The assessment pertaining to marine life and fisheries is inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. The fishing industry, which is active in the waters off the West Lewis coast and supports a diverse marine ecosystem, is not sufficiently safeguarded by the application. It does not adequately demonstrate how these crucial uses and habitats can be preserved without significant disruption.

A central concern is the assumption that fishing activities can be relocated without repercussions. The application fails to provide evidence that alternative fishing grounds exist and can support the additional pressures that would result from displacement.

This absence is critical as it poses a risk of overfishing in other areas, potentially leading to broader economic consequences for the local fishing fleet. The implications for fisheries and livelihoods remain unclear without a robust, evidence-based assessment.

Additionally, the proposal presents considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling over prolonged periods is anticipated to cause disturbances across extensive areas, which may impact species such as dolphins. The predicted disturbances to a significant portion of the local bottlenose dolphin population raise substantial concerns. However, the application diminishes the importance of these impacts and lacks adequate supporting evidence to justify this minimisation.

There exists a notable inconsistency within the application, acknowledging the need for licences to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction diminishes the assessment's credibility and raises questions about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment does not address cumulative impacts resulting from a combination of pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. The absence of a comprehensive evaluation of these combined effects obscures the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 and the National Marine Plan. It does not establish that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thereby undermining any assertion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project is fundamentally flawed, as it fails to adequately evaluate the onshore infrastructure and its impacts as part of a unified project. The offshore turbines and the associated onshore works are inextricably linked, yet they have been assessed separately, leading to a disjointed evaluation that obscures the true extent of the environmental and socio-economic implications.

The onshore components comprise cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities will involve excavation in areas of deep peat, particularly within Barvas Moor, which is both an important carbon

store and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore effects, the application impedes the proper consideration of cumulative impacts. The Environmental Impact Assessment process stipulates that all parts of a project should be reviewed collectively. However, the distinction between offshore and onshore elements has resulted in a failure to fully comprehend the combined effects on peatlands, local habitats, and surrounding communities.

Moreover, there are substantial risks to sensitive ecosystems, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place, leading to a significant evidential gap concerning biodiversity protection.

Concerns about carbon balance also emerge from this proposal. The disturbance of peatland can release stored carbon, potentially incurring a carbon debt that counters the aims of renewable energy initiatives. The application does not convincingly address this concern or show that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land presents possible conflicts with current land use and legal rights. There is a lack of evidence indicating that the necessary consents or processes have been initiated, which raises issues about the project's viability and lawful execution.

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

In conclusion, the fragmented approach to the assessment of project components, the absence of a comprehensive evaluation, and the lack of evidential support concerning environmental and land use impacts render this portion of the application incomplete and unreliable, obstructing a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the key issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this under an enhanced policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify the fundamental

shortcomings.

There are notable deficiencies in the evidential basis required for determining the application. Critical gaps exist in baseline data, and there remains an undefined design envelope alongside unspecified reliance on mitigation measures. Furthermore, key impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism impacts, have been overlooked. Consequently, the Environmental Impact Assessment is insufficient, impeding a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the incomplete disclosure of the Social Impact Assessment represents a serious omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is in direct contradiction with National Planning Framework 4. It fails to adequately protect biodiversity, natural environments, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent and do not satisfy the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, precluding a lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The vast array of information gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs the ability to make a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuses consent on these grounds or employs the relevant regulatory provisions to obtain the necessary missing information.

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

Additional Comments

Hebrides are a beautiful place and need conserving and preserving from these implementation of buildings.

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: 8F490099

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 frameworks. A comprehensive review of the Environmental Impact Assessment Report and accompanying documents highlights numerous material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Situated off the west side of the Isle of Lewis, this development threatens an area celebrated for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The nature, size, and design of the proposal raise serious questions about its alignment with statutory requirements, national policy, and the essential principles of sustainable development.

The application lacks a solid evidential foundation necessary for lawful determination. It reveals significant gaps in critical environmental data, presents limited and inconsistent baseline information, and leaves essential elements of the proposal undefined. The reliance on a flexible design framework obstructs a clear understanding of the likely significant effects. Furthermore, the proposed mitigation measures, which have yet to be clearly articulated, hinder any assessment of their potential effectiveness. Consequently, the documentation fails to provide a thorough or informed perspective on the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

Substantial conflicts with established policy are evident. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national mandates for protecting biodiversity, addressing climate concerns, and maintaining environmental integrity. These inconsistencies challenge the statutory tests necessary for consent and undermine the competent authority's ability to determine the proposal's acceptability in policy terms.

The scale of the proposed development is unprecedented for this locale, with large turbines located disturbingly close to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, the reliance on unspecified mitigation strategies, evidential shortcomings, and evident policy violations illustrate that the application is fundamentally incomplete and incapable of facilitating a lawful decision. Under these circumstances, it is imperative that the precautionary principle be invoked.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A key contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions lack sufficient support from the underlying evidence. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately address the sensitivity of the environment and the scale of change anticipated. The West Lewis coastline, characterised by an open Atlantic horizon, an undeveloped character, and a profound sense of remoteness, would be fundamentally altered by the introduction of large-scale turbines in close proximity to the shoreline. This would create a continuous and dominant industrial presence, resulting in a permanent and irreversible transformation of the landscape.

The application does not effectively convey the magnitude of the visual changes that would arise. The turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, thereby impacting visual amenity and undermining the defining qualities of naturalness and remoteness. There is a concerning lack of clarity regarding the level of impact and its significance within the context of such a sensitive landscape.

Methodological issues also arise in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, calling into question the reliability of the assessment.

Moreover, there is a failure to adequately consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, linked visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital relationships, changing the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents a visual impact as well as broader cultural and spatial harm that has not been sufficiently addressed in the application.

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

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. The resulting changes would thus be fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation.

In conclusion, the assessment fails to 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 preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents an incomplete assessment of construction and pollution risks, lacking the necessary detail to evaluate potential environmental effects. It proposes extensive seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that would be prepared after consent, which prevents any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures is concerning due to the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on the methods for preventing, controlling, or monitoring these risks.

There is also ambiguity surrounding the scale and behaviour of sediment plumes generated by 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 applies to 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 heightens these concerns. By postponing contingency planning to after consent, the application hampers the ability to evaluate whether suitable safeguards 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 determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed before granting consent, and when such information is absent, a lawful determination cannot be reached. The application does not demonstrate 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 about potential impacts render the assessment materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and further confirm that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not adequately consider the full range of impacts associated with what constitutes a single integrated project. While the offshore turbines and onshore works are interconnected, they are evaluated separately, leading to a disjointed approach that masks the true extent of environmental and socio-economic consequences.

The onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and necessary access routes through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as an important carbon store and is an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

By excluding or postponing an assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the distinct treatment of offshore and onshore elements means that the combined repercussions on peatlands, habitats, and communities are inadequately understood.

There are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not establish that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been employed, indicating a significant evidential gap concerning biodiversity protection.

Additionally, the project raises serious concerns related to carbon balance. The disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application fails to sufficiently address this matter or show that the overall carbon balance remains advantageous.

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

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

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

TOURISM

The evaluation of tourism impacts presented in the application is severely lacking and does not adequately address the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contributions they make.

Tourism on the island has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nonetheless, the application neglects to assess how the industrialisation of the seascape and any resultant decline in environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains unclear whether the proposed development would yield a net economic advantage or jeopardise an established and burgeoning sector.

The assessment also overlooks the significance of environmental quality in promoting tourism, including the value of unspoiled landscapes and dark skies to the visitor experience. This is especially relevant for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

Given that this is an island community with limited economic diversification, the failure to evaluate the impacts on tourism extends to broader concerns regarding 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 properly examined, as required under the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the economic reliance of the island culminates in a significant evidential gap. This deficiency undermines a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal presents significant shortcomings in its adherence to the principles of sustainable development, particularly when evaluated against statutory obligations, national policy, and evidential benchmarks. This application echoes the fundamental issues that led to 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 conservation, landscape integrity, and community wellbeing, it still fails to meet essential requirements.

Crucial gaps in baseline data are evident, along with an undefined design envelope, and there is an overreliance on unspecified mitigation measures. Additionally, key impact pathways related to nocturnal wildlife, complete onshore infrastructure, and tourism effects have been overlooked. The Environmental Impact Assessment is therefore inadequate, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Moreover, procedural deficiencies are apparent. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural environments, or cultural heritage. It also fails to ensure 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 impacts of offshore and onshore components have not been thoroughly evaluated, leaving potential effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks remain ambiguous and may be substantial. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent within their findings. The evidential requirement to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion about the acceptability of impacts.

The proposal threatens to bring about profound and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism represent enduring impacts that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively inadequate for determination. The multitude of information deficiencies, coupled with policy conflicts and unresolved environmental uncertainties, obstructs a lawful and evidence-based decision. The competent authority must either reject this application outright or invoke

regulatory provisions to demand the submission of the missing information.

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

Additional Comments

This development is a prime example of an out of scale project in absolutely the wrong place in so many respects. I urge decision makers to reject this application.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A7DB818E

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. A thorough review of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies in planning, environmental considerations, cultural impact, and procedural compliance. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine natural environment, and rich cultural heritage. The scale, design, and proximity of the development raise essential issues concerning its alignment with statutory obligations, national policy directives, and the principles of sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful assessment. Important environmental data is absent, baseline information is either limited or inconsistent, and numerous critical aspects of the proposal remain undefined. The proposal's flexible design framework obscures a clear understanding of the potential significant effects, and reliance on unspecified mitigation measures means their anticipated effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

There are evident and substantial conflicts with policy frameworks. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate that it can fulfil national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies directly challenge the statutory requirements for consent and hinder the competent authority's ability to determine the development's policy acceptability.

The unprecedented scale of the proposal, involving the installation of large turbines in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle is applicable.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to adequately assess the likely environmental effects of the proposal. It employs a flexible Project Design Envelope that does not commit to specific turbine dimensions, layouts, or configurations, which introduces considerable uncertainty. This approach undermines the assessment's integrity, making it difficult for both the public and the competent authority to fully grasp the true extent of the environmental impacts, as the presented effects may not align with what will ultimately be constructed.

Additionally, the application significantly relies on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. By seeking consent on the premise that any environmental harm will be addressed at a later stage, it hinders a genuine evaluation of the effectiveness of these measures or an assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contradicts the intention of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are established before any determination.

The assessment is further weakened by evidential deficiencies, such as gaps in baseline data and limitations in the methodology, coupled with an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of the impacts, particularly where claims of negligible or non-significant effects are made without substantial supporting data. Without adequate information, the assessment fails to clarify cumulative and worst-case impacts, introducing a level of scientific uncertainty that conflicts with statutory obligations.

Consequently, the application does not meet the evidential standard required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been thoroughly assessed or that suitable safeguards are in place.

Overall, the combination of relying on an undefined design envelope, the lack of specified mitigation measures, and the presence of gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and comprehensive evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly flawed, failing to deliver a comprehensive and trustworthy understanding of ecological receptors within the West Lewis coastal environment. This marine system is particularly sensitive

and biologically active, yet the baseline data remains incomplete. The methodologies employed do not sufficiently capture essential aspects such as species presence, behaviour, and habitat use. Consequently, the assessment does not establish a solid evidential foundation for evaluating potential impacts.

One critical gap is the assessment related to otters, which are classified as a European Protected Species. The application does not adequately recognise or evaluate their active utilisation of coastal areas for foraging and movement. The oversight concerning their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects stemming from construction disturbance, noise, and increased activity. This deficiency undermines any conclusions drawn regarding the absence of significant effects on otters.

Additional shortcomings are evident in the evaluation of basking sharks. The dependence on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or properly consider relevant data results in an incomplete baseline, further compromising the reliability of the conclusions presented.

These methodological weaknesses culminate in conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. The lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty surrounding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, given that 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, thereby invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application does not satisfy the evidential threshold required to demonstrate no adverse effect on the integrity of protected sites. There are significant gaps in evidence, internal inconsistencies, and methodological weaknesses that undermine the reliability of the ornithological assessment. The assessment fails to adequately evaluate the implications of displacement, collision risk, and habitat loss for internationally

important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline. The application suggests that no significant adverse effects are anticipated, yet it simultaneously puts forward a Habitats Regulations derogation case, which implies that significant harm is expected. This contradiction raises serious concerns about the validity of the assessment's conclusions.

Furthermore, the assessment does not sufficiently demonstrate that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will not be adversely impacted. The significance of these feeding grounds is not fully considered, and the reliance on modelling methods introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are experiencing severe declines. The methodologies used are likely to underestimate potential mortality rates, particularly where baseline data is lacking and the behavioural responses of these species are not fully understood.

The siting of turbines in a recognised migratory corridor adds another layer of significant risk, effectively creating a barrier within a primary flight path for 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 effects on species with relatively small global populations been considered.

Collectively, these deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. The overall conclusion is that the assessment is unreliable due to its internal inconsistencies and insufficient evidence, which prevents a thorough evaluation of impacts and indicates that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply intertwined. It adopts a simplistic viewpoint, treating heritage as mere isolated assets rather than recognising their ongoing social, cultural, and spiritual relevance to the community.

A significant shortcoming is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active sites of burial and spiritual practice, yet the assessment inaccurately categorises them as static features, neglecting their continued significance and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural effects and disregards their importance in community life.

Moreover, the application overlooks intangible cultural heritage elements, including the Gaelic language and traditions, as well as the long-standing connection between the community and the coastal environment. These factors are vital to the area's identity

but are conspicuously absent from the assessment, representing a serious omission. Without acknowledging these aspects, the cultural impact of the development cannot be accurately gauged.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds a distinct cultural identity, recognised as that of an Indigenous People; however, no Free, Prior and Informed Consent process has been followed. This lack of meaningful engagement undermines the assessment's credibility and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a critical procedural failure. This assessment is a statutory requirement under the Islands (Scotland) Act 2018. Without it, the competent authority is unable to fulfil its legal responsibility to evaluate the social, cultural, and economic impacts on the island community, thereby preventing a lawful determination.

From a policy standpoint, these deficiencies place the proposal in direct opposition to the National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the disregard for living cultural practices, clearly deviates from policy requirements.

Collectively, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks a complete assessment of 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 omission creates a significant gap in evidence and hinders both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts come from direct engagement with the community and are not speculative. Nonetheless, the failure to disclose the complete assessment restricts proper scrutiny of these findings and limits the determination of their significance in the decision-making process.

Moreover, the proposal is seen as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, these effects have not been adequately incorporated into the main application, nor have they been given appropriate weight. The withholding of the full Social Impact Assessment

obscures the real 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 critical for developments of this magnitude, especially where community character and functioning may be affected. By not providing the complete dataset, the application fails to offer a robust evidential basis to evaluate the balance between benefits and harms.

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

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

In summary, the non-disclosure of the complete Social Impact Assessment, paired with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and supports the conclusion that the application does not possess sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

visual impact may have been understated, casting doubt on the reliability of the assessment.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks a comprehensive assessment of construction and pollution risks, failing to provide the necessary detail for evaluating potential environmental effects. Given the high-energy Atlantic environment, substantial seabed preparation and installation works are proposed, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that would only be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and

contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it lacks sufficient detail on prevention, control, and monitoring strategies.

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

The concerns are further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards are in place to manage pollution events. This approach introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be evaluated prior to consent, and the lack of such information renders a lawful determination impossible. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts create a materially deficient assessment. These deficiencies obstruct a robust evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment fails to provide a strong evaluation of the ecological or socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not prove that these uses and habitats can be protected or maintained without serious disruption.

A significant concern is the assumption that fishing activities can be moved without any consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or able to handle additional pressure. This lack of information is crucial, as displacement could lead to overfishing in other areas and might have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, it is impossible to understand the impacts on fisheries and local livelihoods.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise produced during construction. High-energy hammer piling over an extended duration is expected to cause disturbances over large areas, affecting species such as dolphins. The predicted disturbance to a significant part of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

Moreover, there is an inconsistency in the application regarding the necessity for licences to allow harm to European Protected Species, while simultaneously describing impacts as negligible. This contradiction undermines the assessment's credibility and raises issues concerning compliance with the Habitats Regulations, especially where harm is expected to a level that requires legal approval.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking and does not account for the full range of impacts that arise from this single integrated project. The offshore turbines and the onshore works are inherently connected; however, they are evaluated separately, leading to a disjointed approach that obscures the true scale of environmental and socio-economic consequences.

Included in the onshore elements are cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, a vital carbon store and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact

Assessment process mandates that all project components be considered collectively; nevertheless, the division between offshore and onshore elements results in an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

There are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly show that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This presents a distinct evidential gap concerning biodiversity protection.

Furthermore, the routing of infrastructure across active croft land raises concerns about potential conflicts with existing land use and legal rights. The application does not supply evidence that the necessary consents or procedures have been initiated, which casts doubt on the deliverability and lawful implementation of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a significant oversight. The West Lewis coastline is renowned for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed introduction of permanent red aviation lighting, visible from long distances, would create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the importance of dark skies to the region's identity and to emerging sectors such as astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall landscape and environmental evaluation.

Furthermore, there is no analysis of the implications for nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased risks of collision. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on

these species or its contribution to mortality rates have not been addressed.

This gap is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and the associated risks. Species such as Kittiwakes, which may forage or migrate during the night, are also susceptible to disorientation caused by artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a critical void in understanding ecological impacts.

Without an assessment of nocturnal effects, it is impossible to determine whether protected species or designated sites could be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, necessitating the application of the precautionary principle and precluding a lawful determination.

From a policy standpoint, these omissions are at odds with National Planning Framework 4 regarding the protection of natural areas and environmental quality. They further undermine the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an essential component of the overall setting.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a serious shortcoming in meeting the requirements for sustainable development, as judged against statutory obligations, national policy, and evidential standards. The application mirrors the key issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This time, it is put forward under a more stringent policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Crucially, the application lacks a complete and reliable evidential basis necessary for determination. There are significant gaps in baseline data, an unspecified design envelope, and mitigation measures that are not clearly defined. Additionally, it omits vital impact pathways, including those relating to nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a full understanding of potential significant effects or residual impacts.

Moreover, there are significant procedural failings. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to provide the full Social Impact

Assessment is a material omission. These shortcomings hinder the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contravenes the National Planning Framework 4 by failing to protect biodiversity, natural areas, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor can it show a net economic benefit owing to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially severe. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

Please don't ruin our landscape and wildlife, both land and sea.

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: 3EDC6620

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with marine licensing and Environmental Impact Assessment procedures. A thorough review of the Environmental Impact Assessment Report and accompanying materials reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns arise regarding the compatibility of the project's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. Essential environmental data is missing, baseline information is either limited or inconsistent, and crucial components of the proposal remain undefined. The adoption of a flexible design framework complicates the assessment of likely significant effects, and the reliance on unspecified mitigation measures hampers the evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed perspective on the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

There are evident and substantial conflicts with existing policies. The proposal is 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 does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly pertain to the statutory tests required for consent and challenge 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 sited in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight that the application is incomplete and unable to facilitate a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report falls short in its capacity to provide a full and transparent account of the potential environmental consequences of the proposed development. One critical issue is the reliance on a flexible Project Design Envelope, which lacks commitment to specific dimensions, layouts, or configurations of turbines. This introduces significant uncertainty and hampers the assessment's integrity, as it obscures the potential impacts that the final development may entail. Consequently, both the public and the competent authority are unable to grasp the true extent of the environmental effects involved.

Moreover, the application places considerable emphasis on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent under the premise that environmental harm will be mitigated post-consent precludes any substantive evaluation of these measures' effectiveness or the assessment of residual impacts. This postponement of vital information contradicts the core aim of the Environmental Impact Assessment process, which mandates that significant effects and mitigation strategies must be clearly identified before a determination can be made.

The report also exhibits significant evidential shortcomings, such as insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly where negligible or non-significant effects are concluded without adequate supporting data. The lack of comprehensive information obscures understanding of cumulative and worst-case impacts and introduces scientific uncertainties that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential criteria set forth by the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. The precautionary principle must be engaged, especially regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly in areas concerning biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or if suitable safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data leads to an Environmental Impact Assessment Report that is both unreliable and incomplete. These deficiencies hinder a lawful and thorough evaluation of environmental impacts, leaving the competent authority unable to make a fully informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives presented in the application is insufficient and does not fulfil the requirements of the Environmental Impact Assessment. Instead of offering a structured and reasoned comparison of viable alternatives based on environmental impacts, the application merely recounts the project's development history. This

method does not establish that less harmful options have been effectively identified, evaluated, and chosen over more damaging alternatives.

There is a lack of transparent and evidence-based comparisons of different offshore locations, development sizes, or design configurations. Notably, the application fails to show that the developer has adequately considered placing turbines further offshore, where visual, ecological, and coastal impacts would probably be less severe. The sensitive nature of the West Lewis coastline and the critical significance of proximity to the shore in assessing impact highlight the failure to analyse these options, preventing any conclusion that the proposed site is the least damaging one.

This inadequacy also affects cable routing and landfall assessment, as there is insufficient evidence that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been implemented, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not illustrate that environmental harm has been minimised through site selection, layout, and routing of infrastructure. This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to determine if there are less harmful and more suitable alternatives available. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal is sustainable or complies with relevant policies.

From a policy standpoint, this shortcoming compromises adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot receive a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal presented fails to adequately assess cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape that intricately links environment, language, tradition, and community. The assessment adopts an overly simplistic view, treating heritage as a collection of separate, static assets instead of recognising their continuing social, cultural, and spiritual significance within the community.

There is a notable shortcoming in how culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are addressed. These locations serve as active sites of burial and spiritual practice, yet the assessment reduces them to mere static features, neglecting their ongoing use and meaning, as well as the potential impacts of development on their surroundings. This misrepresentation leads to an incomplete understanding of the cultural implications and disregards the sites'

importance in community life.

The intangible aspects of cultural heritage are also not considered, with the assessment omitting critical elements like the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These factors are vital to the area's identity, yet their exclusion signifies a major oversight. Without addressing these elements, the cultural impact of the development remains inadequately assessed.

Concerns extend to community rights and engagement. The Gaelic-speaking population has a unique cultural identity and is recognised as an Indigenous People, yet the process of Free, Prior and Informed Consent has not been followed. This lack of genuine engagement calls into question the credibility of the assessment and fails to adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

Furthermore, a significant procedural error arises from the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without such an assessment, the relevant authority is unable to meet its legal obligation to evaluate the social, cultural, and economic repercussions on the island community. This oversight alone renders a lawful determination impossible.

From a policy standpoint, the deficiencies in the application are 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, as well as to recognise living cultural practices, constitutes a clear breach of policy requirements.

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and essential statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly examined, and the application does not provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has not published the full Social Impact Assessment despite having commissioned it, which has resulted in a significant evidential gap. This lack of transparency hinders both the public and the competent authority from gaining a comprehensive understanding of the social risks identified in the developer's own research. While summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity, the failure to disclose the complete assessment limits the ability to scrutinise these findings thoroughly.

Moreover, the proposal is viewed by some as a direct threat to community identity and cohesion, with the developer acknowledging “cultural loss” within their findings.

Unfortunately, these critical impacts have not been adequately integrated into the main application or weighted appropriately. The absence of the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This situation undermines the Environmental Impact Assessment process, as a thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may alter community character and functioning. The lack of a complete dataset means the application does not provide a full evidential basis for evaluating the balance between potential benefits and harms.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and avoid harm; however, available evidence suggests existing adverse effects that remain undisclosed. Without the full assessment, demonstrating compliance with this policy becomes unfeasible.

The procedural implications are considerable. The competent authority is unable to perform a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This material omission signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the combination of non-disclosure of the complete Social Impact Assessment and evidence of existing adverse impacts renders the assessment incomplete and unreliable. This inadequacy obstructs a lawful determination and leads to the conclusion that the application is not backed by sufficient information.

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

The sensitivity of the receiving environment heightens the concerns associated with this

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

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

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

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

In summary, the lack of clearly defined mitigation measures, detailed management plans, and the uncertainty regarding potential impacts culminate in a materially deficient assessment. These shortcomings impede a thorough evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

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 an intrusive "wall of light" effect across the western horizon. This lighting fundamentally alters the night-time environment along the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are vital to the area's environmental quality, cultural identity, and tourism potential, particularly as emerging sectors like astro-tourism grow in importance.

However, the Environmental Impact Assessment lacks any assessment of dark skies and nocturnal wildlife, representing a material omission. This failure to consider the effects of the proposed lighting on visual amenity, landscape character, and the experiences of both residents and visitors is significant given the integral role dark skies

play in the area's identity.

Moreover, there is no evaluation of the impact on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and increased collision risk. The absence of a lighting impact assessment or phototaxis study means that potential effects on these species and the risk of increased mortality have not been evaluated.

The reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity or the associated risks to species such as Kittiwakes, which may forage or migrate at night. This oversight results in a critical gap in understanding the ecological impacts. Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The application does not meet the evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle and preventing a lawful determination.

From a policy standpoint, these omissions conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They undermine a comprehensive assessment of landscape and seascape impacts, as the night-time character is a fundamental aspect of the environment. Collectively, the absence of any assessment concerning 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.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development in accordance with statutory duties, national policy, and evidential standards. It mirrors the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This current proposal, however, is presented against a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for determination, including critical gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and the omission of essential impact pathways such as nocturnal wildlife, the complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident, particularly the lack of a compliant Island Communities Impact Assessment, which breaches statutory requirements set forth in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact

Assessment represents a material omission. These gaps hinder the competent authority's ability to evaluate the effects on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unfit for determination.

Moreover, the proposal conflicts with National Planning Framework 4, as it does not protect biodiversity, natural places, or cultural heritage. It also fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been adequately evaluated, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

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

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either refuse consent on these bases or invoke the relevant regulatory provisions to mandate the submission of the requisite 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: 08C8E36D

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. It highlights significant deficiencies in material planning, environmental, cultural, and procedural aspects based on a review of the Environmental Impact Assessment Report and its supporting documentation. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious concerns about its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of critical environmental data, with limited and inconsistent baseline information and several key elements of the proposal remaining undefined. The reliance on a flexible design framework obstructs a clear assessment of likely significant effects, while the unspecified mitigation measures mean that their effectiveness cannot be evaluated. Consequently, the existing documentation does not allow for a comprehensive understanding of environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust evidence to support them.

There are evident and substantial policy conflicts within the application. It seems inconsistent 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. The proposal does not sufficiently demonstrate that it can meet national obligations to protect biodiversity, climate interests, and environmental integrity. These policy conflicts directly relate to the statutory tests required for consent and undermine the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact due to the large turbines being placed in close proximity to the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy further illustrates that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent examination of the likely environmental consequences of the proposed project. A significant concern is the reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and obstructs a reliable worst-case scenario assessment, undermining the evaluation'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 true environmental ramifications.

The application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is being sought with the assumption that environmental harm will be addressed later, which hinders any effective evaluation of these measures' efficacy or the assessment of residual impacts. This approach, which defers critical information to post-consent phases, is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies are clearly outlined before a determination is made.

Moreover, there are substantial evidential shortcomings, such as insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This creates uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust data to support such conclusions. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that fails to align with statutory requirements.

As a result, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations, which is necessary to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, particularly in aspects relating to biodiversity protection and environmental integrity, as it has not been established 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 specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects, thereby leaving the competent authority unable to make a well-informed decision based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to meet the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it inadequately identifies

and assesses protected species. The assessment of marine ecology and protected species presents significant deficiencies, particularly concerning the understanding of ecological receptors within the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system, yet the baseline data remains incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat use. Consequently, the conclusions drawn lack a sound evidential basis for evaluating potential impacts.

A notable shortcoming pertains to otters, classified as a European Protected Species, where the application does not adequately acknowledge their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns results in an inadequate assessment of the potential impacts of construction disturbance, noise, and increased activity. This oversight undermines any conclusions regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks reveals additional deficiencies, as reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodological approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations indicating frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline, weakening the reliability of the conclusions presented.

These methodological limitations result in assessments of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, thus generating uncertainty regarding the true scale of risk to marine species and habitats.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions compromises the reliability of the assessment. These shortcomings inhibit a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application does not possess a sufficient evidential foundation. In light of the uncertainty introduced, it cannot be reasonably concluded that adverse effects can be excluded beyond reasonable scientific doubt, thereby engaging the precautionary principle and indicating that consent cannot be lawfully granted.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines. However, the ornithological assessment related to the development application is materially flawed, containing significant evidence gaps and internal inconsistencies that undermine its conclusions. The application fails to adequately demonstrate that these species will not be adversely affected, despite being located within key foraging areas and migratory pathways. It does not robustly evaluate the implications of displacement, collision risk, or habitat

loss.

A fundamental contradiction exists within the application itself; the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and indicates that the conclusions drawn are not substantiated by the evidence provided.

The assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces further uncertainty, particularly for species that are in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

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

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

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

Overall, these shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. Such failings prevent a thorough evaluation of potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is fundamentally inadequate. It does not recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically linked. The application adopts a reductive approach,

viewing heritage merely as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual functions within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active places of burial and spiritual practice; however, they are categorised as static features in the assessment. This failure to consider their continued use and meaning, as well as the implications of development on their settings, results in an incomplete evaluation of cultural effects, overlooking their vital role in community life.

Moreover, the application neglects to assess intangible cultural heritage, including the Gaelic language and local traditions. The long-standing relationship between the community and the coastal environment is central to the area's identity, yet these elements are entirely absent from the assessment, representing a significant omission. As such, the cultural impact of the development cannot be fully understood without considering these crucial factors.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, which aligns with characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, as required 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. This omission alone hinders a lawful determination of the proposal.

From a policy standpoint, these deficiencies conflict directly with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear departure from policy requirements.

In summary, the collective failures to assess living heritage, intangible cultural value, community rights, and adherence to statutory obligations create a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust foundation for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal poses a significant threat to community identity and cohesion, as highlighted by the findings of the developer's own research, which identified "cultural loss." However, these impacts have not been adequately incorporated into the main application or afforded the necessary consideration. The absence of the full Social

Impact Assessment conceals the genuine human and social costs associated with the development.

Furthermore, the assessment of social impacts, health, and wellbeing is materially deficient, lacking the transparency required for a lawful evaluation. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been made public. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's capacity to grasp the full extent of social risks identified through the developer's own work.

Available summaries reveal that residents are currently facing measurable stress, anxiety, and concern related to the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are not speculative in nature. However, the failure to disclose the full assessment obstructs proper scrutiny of these findings and restricts the ability to evaluate their significance within the decision-making process.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and avoid harm. Yet, the evidence available suggests existing adverse effects that have not been fully revealed. Without access to the complete assessment, it is impossible to ascertain compliance with this policy.

Moreover, the lack of transparency undermines the Environmental Impact Assessment process. It is crucial to have a comprehensive understanding of social, economic, and health impacts for developments of this magnitude, particularly when community character and functioning may be at stake. The failure to provide the full dataset results in an application that does not present a complete evidential basis for assessing the balance between benefits and harm.

The procedural implications of these deficiencies are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This situation represents a material omission within the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Taken together, the withholding of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This ultimately prevents a lawful determination and reinforces the conclusion that the application is not supported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal lacks a thorough assessment of the seascape, landscape, and visual impacts, failing to adequately represent the scale of change and the sensitivity of the

receiving environment. The character of the West Lewis coastline is marked by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would establish a continuous industrial presence that fundamentally alters this character, leading to a permanent transformation of the landscape.

There are serious concerns regarding the methodology used in 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 high-value landscapes. This suggests a risk of underestimating the magnitude of visual impact, which raises doubts about the reliability of the assessment.

The application fails to consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting intertwined with the Atlantic horizon. Treating these heritage assets as isolated, rather than recognising their interdependence, results in an inadequate evaluation of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4's commitment to safeguarding natural places and historic assets. The scale of the proposed changes is incompatible with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of policy compliance.

Additionally, it is evident that the identified impacts cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, unable to be reduced to an acceptable level through any form of mitigation.

Overall, the assessment is inadequate, failing to accurately represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings prevent a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies in the assessment of construction and pollution risks, rendering it materially incomplete. It fails to include adequately

developed Construction Environmental Management Plans or Pollution Prevention Plans, which are crucial for evaluating potential environmental effects. Instead, the proposal leans heavily on unspecified mitigation and contingency measures that would only be established after consent, thus hindering any meaningful assessment of their adequacy or effectiveness.

This lack of detail is particularly alarming when considering the sensitivity of 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 associated with sediment mobilisation and potential chemical or oil spills, it does not sufficiently outline how these risks will be prevented, monitored, or controlled.

Moreover, uncertainty looms over the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty extends to marine species and habitats that have already been identified as sensitive within the broader assessment.

The absence of detailed emergency response procedures exacerbates these issues. By relegating contingency planning to a post-consent phase, the application obfuscates the evaluation of whether suitable safeguards will be in place to address pollution incidents. This approach not only introduces procedural risk but also undermines the capacity of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Prior to consent, it is necessary to assess likely significant effects and mitigation measures, and the absence of this information means that a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the shortcomings evident in the undefined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts culminate in a materially deficient assessment. These failings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is inadequate.

FISHERIES AND MARINE LIFE

The proposal's assessment of marine life and fisheries is fundamentally inadequate, failing to provide a thorough examination of both ecological and socio-economic implications. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the application does not adequately ensure that these vital habitats and activities will remain protected and maintained without considerable disruption.

A notable concern is the unsubstantiated assumption that fishing activities can be displaced without repercussions. There is a lack of evidence indicating that alternative fishing grounds are available, accessible, or able to accommodate any increased pressure from displaced fishing. This absence of information is critical, as such displacement could lead to overfishing in other areas and may result in broader economic ramifications for the local fishing fleet. Without a detailed and evidence-based evaluation, the implications for fisheries and local livelihoods are not fully understood.

Moreover, the proposal poses significant threats to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is anticipated to cause disturbance across considerable distances, impacting species including dolphins. The forecasted disturbance to a substantial portion of the local bottlenose dolphin population raises alarming concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

Inconsistencies within the application are evident, as it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction diminishes the credibility of the assessment and raises alarms regarding adherence to the Habitats Regulations, especially when harm is expected to an extent that warrants legal authorization.

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

From a policy standpoint, the application does not illustrate conformity with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or evade unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal is sustainable.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking, failing to encompass the comprehensive impacts associated with this singular integrated project. The offshore turbines and the onshore works are closely interconnected, yet they are evaluated in isolation, leading to a disjointed approach that obscures the magnitude of the environmental and socio-economic consequences.

Key onshore elements involve cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure across delicate landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is vital as a significant carbon store and an ecologically sensitive habitat. The proposal does not provide an exhaustive assessment of these impacts, obstructing a complete understanding of the project's environmental footprint.

By neglecting to assess the onshore impacts or postponing their evaluation, the application obstructs an accurate analysis of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the fragmentation of offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

Significant risks are posed to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application fails to illustrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance strategies have been implemented, leading to a substantial evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland has the potential to release stored carbon, thus creating a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence that the requisite consents or procedures have been commenced, which brings the deliverability and lawful execution of the project into question.

From a policy standpoint, the division of the project's assessment and the failure to demonstrate the protection of peatlands, habitats, and land use interests contravene the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application's validity.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This lighting fundamentally alters the night-time environment of the

West Lewis coastline, which is characterised by exceptionally dark skies that contribute to environmental quality, cultural identity, and tourism value.

An Environmental Impact Assessment for this application notably lacks an evaluation of the impacts on visual amenity, landscape character, and the experiences of both residents and visitors. This gap is particularly concerning given the significance of dark skies to the area's identity and the potential for emerging tourism sectors, such as astro-tourism. The absence of such assessments creates a clear deficiency in the overall landscape and environmental evaluation.

Furthermore, there is no examination of the effects of this artificial lighting on nocturnal wildlife. Species that are particularly sensitive to artificial lighting, such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, may experience disorientation and increased collision risks due to phototaxis. The application does not include a lighting impact assessment or a phototaxis study, which means it fails to evaluate how aviation lighting could impact these species or lead to higher mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not account for nocturnal activities and the associated risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

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

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 fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of

industrialisation. This current application is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not comply.

Critical deficiencies are evident in the evidential basis for assessment. The application lacks comprehensive baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, it neglects vital impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is insufficient, preventing a thorough understanding of potential significant effects or residual impacts.

Additionally, procedural shortcomings are apparent. The failure to provide a compliant Island Communities Impact Assessment contravenes the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment constitutes a serious omission. These lapses hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage, nor does it prove that health and wellbeing impacts are acceptable. The lack of tourism impact modelling means that net economic benefit cannot be evidenced. Moreover, the cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and possibly significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and making it impossible to lawfully conclude that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy inconsistencies, and unresolved environmental risks obstructs the possibility of a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or require the submission of the missing information through relevant regulatory mechanisms.

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

Additional Comments

I strongly object to the size and scale of this proposed wind farm. Having seen other areas of the country utilised and spoilt by these turbines - I do not want to see any of these and discourage future wind farm plans entirely. The noise, the vibration, the visual impact and the distracting nature of the flickering blades is reason enough to suggest they are an environmental hazard as well as detrimental to the people living in /near or in sight of these huge man made monstrosities. The carving and changing of land and natural environments erodes the wild nature of the island should these go ahead. Years of destruction , disruption and mess as well as removal of views and changing of the coastal nature of a large proportion of the Isle of Lewis. I'm furious that the local population are not being considered and are having this oversized and ill thought up project faust upon them - giving it a Scottish Gaelic name doesn't make them palatable call them what they are huge man made ugly eye sores that cause all manner of disruption to wildlife in and above the sea and construction degradation on a massive scale NO I DO NOT WANT THIS to happen !

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: 5EF24A32

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. A thorough review of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies concerning planning, environmental factors, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region known for its stunning Atlantic-facing coastline, near-pristine surroundings, and rich cultural identity. Concerns arise from the scale, proximity, and design of the project, raising questions about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful decision. There is a troubling absence of critical environmental data, with baseline information being limited and inconsistent, while important elements of the proposal remain undefined. The flexible design framework used complicates a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation does not facilitate a comprehensive or informed grasp of the environmental, cultural, or community impacts. Claims regarding negligible or non-significant effects lack robust evidence to support them.

There are notable and substantive policy conflicts present. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and overall health and wellbeing. It fails to demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly relate to the statutory tests required for consent and undermine the capacity of the competent authority to determine the development's acceptability within policy parameters.

The unprecedented scale of the proposal raises significant concerns about its impact on the local landscape, with large turbines positioned alarmingly close to the shoreline, which threatens to dominate the visual environment and adversely affect the ecology. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is essential that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in essential information and does not offer a complete, clear, or trustworthy account of the potential environmental impacts of the proposal. The proposal's use of a flexible Project Design Envelope, which lacks commitment to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This approach hinders a consistent worst-case scenario analysis, compromising the assessment's integrity and obscuring the true environmental effects from both the public and the competent authority.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is sought under the premise that environmental damage will be addressed later, which hinders meaningful evaluation of effectiveness or the assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment process, which mandates that likely significant effects and mitigation strategies be clearly established before any determination.

There are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting evidence. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, contributing to scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not satisfy the evidential requirements under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This brings the precautionary principle into play, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including requirements for biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully assessed or that suitable safeguards are established.

Overall, the dependence on an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data lead to an unreliable and incomplete Environmental Impact Assessment Report. These shortcomings prevent a lawful and robust evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species has significant deficiencies that compromise its reliability and completeness. The West Lewis coastal environment is biologically active and sensitive, yet the baseline data collected is insufficient. The methodologies used do not adequately capture the presence, behaviour, and habitat usage of various species, leading to a lack of sound evidence for assessing potential impacts.

One major oversight is the treatment of otters, which are recognised as a European Protected Species. The application does not properly acknowledge their active use of coastal areas for foraging and movement. Ignoring their core foraging range and behavioural habits means that the assessment fails to evaluate the impacts of construction disturbance, noise, and increased human activity on these animals. This gap undermines any conclusions drawn about the absence of significant effects on otters.

There are also substantial weaknesses in the assessment of basking sharks, where reliance on aerial surveys can lead to significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or adequately consider such crucial data further contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data obstructs a proper evaluation of cumulative and indirect impacts, seasonal variations, and the interactions within the wider ecosystem. This adds uncertainty concerning the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to accurately identify and assess protected species. The uncertainty introduced by these deficiencies precludes the possibility of confidently excluding adverse effects, thus invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already in decline. The ornithological assessment associated with the development proposal is fundamentally flawed, lacking crucial evidence and containing internal contradictions that undermine its conclusions. It fails to demonstrate that these vital species will not be adversely impacted, particularly as the development sits within key foraging areas and migratory routes. There is inadequate evaluation of the implications regarding displacement, collision risk, and habitat loss.

Compounding this issue is a glaring inconsistency within the application; the developer asserts that there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted in scenarios where significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment, indicating that its conclusions are unsupported by the available evidence. The assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, and it fails to properly account for the significance of these feeding grounds. The reliance on modelling techniques injects further uncertainty, especially concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses are not fully understood.

Moreover, the proposed siting of turbines within a recognised migratory corridor creates an additional and substantial risk, acting as a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term ramifications of sustained mortality within this corridor, nor does it consider the potential impacts on species with relatively small global populations.

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

Additionally, the identified deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects places the proposal in direct contradiction to national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These deficiencies obstruct a robust evaluation of potential impacts and lead to the overall conclusion that the application does not fulfill the statutory requirements necessary for a proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to adequately recognise the West Lewis coastline as a dynamic cultural landscape, interlinking environment, language, tradition, and community. It adopts a reductive stance, viewing heritage merely as static assets while neglecting their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is found in the treatment of culturally important sites,

specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and places of spiritual practice, yet they are mischaracterised as static features. This oversight fails to acknowledge their continuing use and meaning, resulting in an incomplete understanding of cultural effects and disregarding their importance within community life.

Furthermore, the assessment neglects intangible cultural heritage, such as the Gaelic language and local traditions, along with the long-standing relationship between the community and the coastal environment. These elements are crucial to the area's identity but have been omitted from the evaluation, creating a substantial gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as possessing a unique cultural identity similar to Indigenous Peoples, has not been engaged in a Free, Prior and Informed Consent process. The lack of meaningful engagement undermines the assessment's credibility and fails to adhere to principles of participation that should guide decisions impacting cultural and environmental interests.

Moreover, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community, which alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from policy stipulations.

In summary, the lack of assessment regarding living heritage, intangible cultural values, community rights, and statutory requirements creates a significant evidential gap. The cultural ramifications of the development have not been sufficiently evaluated, and the application does not establish a robust foundation for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposed development is lacking and does not adequately convey the extent of change or the sensitivity of the local environment. The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped landscape, possesses a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a persistent and overwhelming industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to fully capture the scale of this visual change. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations. This would adversely affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the choice and representation of visual viewpoints in the assessment. There are indications that the viewpoints selected may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly in relation to important cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been downplayed, which compromises the reliability of the assessment.

Moreover, there is a notable deficiency in the evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, connected visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated rather than 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 connections, altering how heritage assets are experienced and their relation to the natural horizon. This change signifies not just a visual impact but also a wider cultural and spatial harm that has not been sufficiently evaluated in the proposal.

From a policy perspective, this proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The scale of change proposed is inconsistent with the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy guidelines.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and closeness of the turbines, their presence would be overwhelming and unavoidable. Thus, the resultant change is not merely something that can be reduced to an acceptable level through mitigation efforts; it is fundamental and permanent.

Overall, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient, lacking the necessary detail to properly evaluate the likely environmental effects. The proposed works involve significant seabed preparation and installation activities within a dynamic Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that would be developed after consent, which obstructs any meaningful assessment of their adequacy and effectiveness.

This dependence on undefined future measures is particularly alarming due to the sensitivity of the environment in question. The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbances caused by sediment and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to potential consequences for marine species and habitats that have already been recognised as sensitive in the broader assessment.

Adding to these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether adequate safeguards are in place for responding to pollution events. This creates procedural risks and hampers the competent authority's ability to assess environmental protection measures prior to determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established under the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with relevant 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 regarding potential impacts collectively render the assessment materially inadequate. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents serious deficiencies in its assessment of fisheries and marine life, failing to deliver a comprehensive evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the application does not demonstrate the ability to protect or maintain these habitats and uses without causing significant disruption.

A notable flaw in the application is the assumption that fishing activity can be relocated without adverse effects. There is no evidence provided to confirm that alternative fishing grounds exist, are accessible, or can bear the additional fishing pressures. This significant omission could lead to overfishing in alternative areas and could have broader economic repercussions for the local fishing fleet. An absence of a clear, evidence-based assessment hampers the understanding of potential impacts on fisheries and local livelihoods.

Additionally, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is expected to cause disturbances over large distances, impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming; yet the application downplays these effects without adequate supporting evidence.

There is an evident contradiction within the application, which acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously asserting that impacts are negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially in areas where anticipated harm necessitates legal authorisation.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is distinguished by its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This significant alteration poses immediate risks that have not been adequately addressed.

Crucially, the assessment fails to evaluate the impact of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The application lacks any lighting impact assessment or phototaxis study, leading to a failure in evaluating how aviation lighting may affect these species or escalate mortality rates.

Moreover, the ornithological assessment is overly reliant on daytime survey data, neglecting the nocturnal activity and associated risks that species such as Kittiwakes face, particularly as they forage or migrate at night. This oversight creates a significant gap in understanding the ecological impacts, as site-specific night-time data has not been collected.

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

From a policy standpoint, the absence of an assessment concerning dark skies and nocturnal wildlife contradicts National Planning Framework 4, which emphasises the protection of natural spaces and environmental quality. This omission also undermines the comprehensive assessment of landscape and seascape impacts, as night-time character is an integral aspect of the environment.

Overall, the lack of any evaluation regarding dark skies and nocturnal wildlife represents a significant evidential gap. The application is incomplete and incapable of supporting a lawful determination due to the absence of baseline data, impact modelling, and species-specific analysis. Immediate action is required to address these critical omissions.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates significant shortcomings in its adherence to sustainable development principles as required by statutory duties, national policy, and evidential standards. The application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, specifically regarding the unacceptable scale of industrialisation. This current application is submitted under a more robust policy framework, which emphasises the importance of biodiversity, peatland protection, landscape integrity, and community

wellbeing.

The evidential basis presented in the application is neither complete nor reliable, featuring critical deficiencies in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the omission of significant impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks comprehensiveness, failing to provide a full understanding of likely significant effects or residual impacts.

Furthermore, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties established under the Islands (Scotland) Act 2018. In addition, the failure to present the complete Social Impact Assessment constitutes a significant omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, which in turn renders the application unsuitable for consideration.

In addition to these procedural issues, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, fails to validate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore components has not been appropriately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks linked to the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and impeding any lawful conclusion regarding the acceptability of impacts.

The proposal would also lead to significant and irreversible alterations to a highly sensitive landscape. Industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism are all permanent consequences that cannot be sufficiently mitigated.

Considering all these factors, the application is both procedurally and substantively inadequate for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is thus urged to either refuse consent based on these grounds or to invoke relevant regulatory provisions to require the submission of the missing information.

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

Additional Comments

The Isle of Lewis is a unique place, through its landscapes and wildlife. The idea of building these wind farms in such a place is absolutely heartbreaking for those that hold the islands dear to them for so many reasons.

The disruption to the marine life building these wind farms is just the start, the impact they will then go on to have when in use to the marine life and seabirds etc cannot be justified. The long term effects of such cannot be known.

The impact on the seascapes of this picturesque island cannot be measured and will surely impact on the tourism to the area as that is not the beach view we have at present and nobody wants! This island is rich with its history and values, these new sights are not welcomed and not in view of such a preserved 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: 5BC464C8

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

Dear Sir/Madam

This representation serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documentation reveals significant material deficiencies in planning, environmental consideration, cultural aspects, and procedural adherence. The project is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not provide an adequate evidential basis for lawful determination, as critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework used hinders a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment requirements, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the development's acceptability within policy parameters.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or dependable account of the potential environmental repercussions of the proposal. The employment of a flexible Project Design Envelope, lacking definitive commitments to specific turbine dimensions, layouts, or configurations, introduces a substantial level of uncertainty. This approach obstructs a consistent application of a worst-case scenario, thereby jeopardising the integrity of the assessment. As a result, the impacts presented may not accurately represent the development that is ultimately constructed, which prevents both the public and the competent authority from grasping the true scale of environmental effects.

Significant reliance is placed on mitigation measures, monitoring strategies, and management plans that remain undefined. The request for consent is thus made on the premise that environmental damage will be addressed at a later stage, which hinders any meaningful evaluation of the effectiveness of such measures or a thorough assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

There are numerous evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty surrounding the scale and significance of impacts, particularly where findings of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces a level of scientific uncertainty that cannot be aligned with statutory requirements.

Consequently, the application does not fulfil the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, specifically the requirements pertaining to biodiversity protection and environmental integrity, as it has not been shown that impacts have been comprehensively assessed or that adequate safeguards are in place.

In summary, the dependence on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determination based on the information provided.

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is insufficient and fails to deliver a thorough and dependable understanding of ecological receptors. This marine system is both biologically active and sensitive, yet the baseline data remains incomplete, while the methodologies employed do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a sound evidential basis for the evaluation of impacts.

Significant shortcomings pertain to 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. The omission of their core foraging range and

behavioural patterns means that potential impacts from construction disturbance, noise, and increased activity have not been sufficiently examined. This gap undermines any conclusions regarding the lack of significant effects on this species.

Deficiencies are also evident in the assessment of basking sharks, where reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that show frequent utilisation of these waters. The failure to include or properly account for such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that any conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, as well as seasonal variations and broader ecosystem interactions. This introduces uncertainty concerning the true extent of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been thoroughly identified or evaluated. The uncertainty created prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, granting consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application does not sufficiently represent the magnitude of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and widely used coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. This level of impact and its significance within such a sensitive landscape have not been properly conveyed in the assessment.

Moreover, there are methodological concerns regarding the selection and presentation

of visual viewpoints. Evidence suggests that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such shortcomings risk understating the magnitude of visual impact, thus undermining the reliability of the assessment.

The assessment also neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, like the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape setting connected by visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation fails to acknowledge their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy perspective, the proposal is at odds with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any claim 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 reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. This deficiency obstructs a robust evaluation of construction and pollution risks and underscores the conclusion that the application is incomplete.

The proposal involves considerable seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application leans on mitigation and contingency measures that would be created after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly troubling 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 acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

Moreover, there is 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 extends to the potential effects on marine species and habitats already identified as sensitive within the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application precludes an evaluation of whether appropriate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed before consent; when such information is absent, a lawful determination cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements relating to environmental protection and water quality.

FISHERIES AND MARINE LIFE

The proposed application raises significant concerns regarding its assessment of fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and a vibrant fishing industry, yet the evaluation does not adequately address how these essential habitats and activities will be protected or maintained.

A critical flaw in the assessment is the assumption that fishing can be relocated without negative effects. There is no evidence provided that alternative fishing grounds exist or are capable of sustaining the added pressure from displaced activities. This lack of information is crucial, as such displacement could lead to overfishing in different areas and have broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based evaluation, the impacts on both fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated by construction activities. The use of high-energy hammer piling for extended periods is likely to disturb marine life over considerable distances,

notably affecting species like dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population raises serious issues. However, the application appears to minimise these concerns without providing adequate supporting evidence.

There is also a notable inconsistency in the application regarding the necessity of licences for any harm to European Protected Species. While it acknowledges the need for legal authorisation where harm is anticipated, it simultaneously asserts that the impacts are negligible. This contradiction calls into question the reliability of the assessment and raises issues about compliance with the Habitats Regulations.

Furthermore, the evaluation does not adequately consider the cumulative impacts from various pressures, such as habitat disruption, noise, and the displacement of fishing activities. Without a comprehensive analysis of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with current marine users or avoid significant negative impacts on marine biodiversity, which obstructs any conclusion that it represents sustainable development.

In summary, the deficiencies in the evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application contribute to an incomplete and unreliable assessment. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development as outlined in statutory duties, national policy, and evidential standards. It raises the same fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This application is now presented within a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for decision-making is neither complete nor reliable. There are significant gaps in baseline data, the design envelope remains undefined, and it relies on unspecified mitigation measures. Furthermore, key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks the completeness needed to fully understand the likely significant effects or any residual impacts.

There are also serious procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a complete Social

Impact Assessment is a material omission. These issues hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately protect biodiversity, natural places, and cultural heritage. It fails to demonstrate that the health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, as there is no tourism impact modelling included. The cumulative effects of both offshore and onshore elements have not been properly assessed, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

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

The proposed project would lead to substantial and irreversible changes to a highly sensitive landscape. It would industrialise the Atlantic-facing coastline, result in a loss of dark skies, disrupt cultural and visual relationships, and negatively impact tourism, leading to permanent effects that cannot be adequately mitigated.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 305B76BA

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 in accordance with marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies related to planning, environmental, cultural, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The proposal raises serious concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development due to its scale, proximity, and design.

The application lacks an adequate 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. Key components of the proposal remain unclear, and the flexible design framework employed hinders a proper assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures calls into question their effectiveness, rendering the documentation inadequate for a comprehensive understanding of the potential environmental, cultural, or community impacts. Consequently, assertions of negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are evident and substantial. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests essential for obtaining consent and impair the competent authority's ability to determine whether the development is policy-compliant.

The scale of the proposal is unprecedented for this location, as it includes large turbines positioned very close to the shoreline, which raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings and fails to offer a comprehensive and transparent account of the expected environmental effects related to the proposal. The flexibility in the Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This variability hinders the consistent application of a worst-case scenario, compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately reflect the eventual development, limiting both the public and the competent authority's ability to grasp the true extent of the environmental effects.

Moreover, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that any environmental harm will be addressed later obstructs meaningful evaluation of effectiveness or residual impacts. This postponement of crucial information to post-consent stages is procedurally improper and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly defined prior to determination.

Additionally, there are notable evidential deficiencies, including gaps in baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. These issues create uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information leads to an unclear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that conflicts with statutory obligations.

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

In conclusion, the reliance on an ambiguous design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These issues obstruct a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application significantly lacks a proper assessment of alternatives, which fails to meet the necessary standards outlined in the Environmental Impact Assessment regime. Instead of offering a coherent, evidence-based comparison of viable options based on their environmental consequences, it presents merely a narrative of how the project has evolved. This narrative does not adequately prove that less harmful

alternatives have been identified, assessed, and prioritised over more damaging choices.

Moreover, there is an absence of clear and evidence-based comparisons regarding alternative offshore sites, development scales, or design configurations. Specifically, the application does not reflect that the developer has adequately considered the potential for placing turbines further offshore, where there would likely be less visual, ecological, and coastal impact. The West Lewis coastline's sensitivity and the significance of proximity to shore in evaluating impacts mean that without such analysis, it is impossible to conclude that the chosen location is indeed the least harmful.

The shortcomings also extend to the evaluation of cable routing and landfall assessments, which lack sufficient evidence that alternative routes have been thoroughly investigated to minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to establish a clear avoidance strategy and the absence of comparative analysis highlight a neglect of design-based mitigation measures, relying instead on mitigation strategies implemented after design.

Consequently, the application does not show that environmental harm has been adequately reduced through careful site selection, layout decisions, and infrastructure routing. This constitutes a failure to adhere to the recognised mitigation hierarchy, leaving the competent authority unable to ascertain whether more appropriate and less harmful alternatives are available. Without a comprehensive alternatives assessment, one cannot conclude that the proposal meets the standards of sustainability or is compliant with policy.

From the perspective of policy compliance, this deficiency undermines adherence to National Planning Framework 4, particularly concerning the safeguarding of natural areas, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant omission that ultimately leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The analysis of marine ecology and protected species in the application is fundamentally flawed, leading to an unreliable understanding of the ecological receptors present in the West Lewis coastal area. This region is characterised as a sensitive and biologically rich marine system; however, the baseline data provided is insufficient, and the methodologies employed fail to adequately identify species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their

active utilisation of coastal zones for foraging and movement. This oversight, particularly regarding their core foraging range and behavioural patterns, results in an inadequate evaluation of potential impacts from construction disturbance, noise, and increased human activity. Such deficiencies undermine any claims made about the lack of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its conclusions. The presence of internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing decline, raises serious concerns. Despite this, the application does not adequately demonstrate that these species will not suffer adverse effects. Key foraging areas and migratory pathways are directly impacted by the development, yet the assessment fails to thoroughly evaluate the potential risks of displacement, collision, and habitat loss.

A notable contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats

Regulations derogation case, which is only necessary if significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not adequately considered, and the reliance on modelling approaches introduces a degree of uncertainty, particularly concerning severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in instances where baseline data is lacking and the behavioural responses of the species are not fully understood.

Moreover, the placement of turbines within a designated migratory corridor significantly heightens the risk to avian populations, effectively creating a barrier along a primary flight path that species use while migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term repercussions of sustained mortality in this corridor, nor does it consider the implications for species with relatively small global populations.

From a regulatory standpoint, the application falls short of the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thereby hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological shortcomings, and inadequate evidence. These issues preclude a comprehensive evaluation of impacts and support the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, particularly regarding the West Lewis coastline, which is a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. This application adopts a simplistic view, treating heritage as isolated, static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A major oversight is evident in the handling of significant cultural sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they serve as active places of burial and spiritual practice. The assessment's failure to account for their continued use and meaning, along with the potential impact

of development on their setting, leads to an incomplete understanding of cultural effects and ignores their essential role in community life.

Furthermore, the evaluation neglects intangible aspects of cultural heritage such as the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These components are vital to the area's identity yet are entirely overlooked in the assessment, representing a significant gap. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Community rights and engagement also raise serious concerns. The Gaelic-speaking population has a distinct cultural identity recognised as part of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the legitimacy of the assessment and does not adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

A further procedural flaw is the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. This omission means the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. Such a gap alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with living cultural practices, clearly deviates from policy requirements.

Overall, the deficiencies in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is fundamentally inadequate 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 remains unpublished. This absence of information creates a significant evidential gap, hindering both the public and the competent authority from comprehending the full range of social risks highlighted by the developer's research.

Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and are, therefore, not speculative in

nature. Nevertheless, the failure to disclose the complete assessment restricts proper scrutiny of these findings and limits the ability to evaluate their importance within the decision-making framework.

There is also recognition that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this acknowledgment, these impacts have not been adequately considered in the main application or given the necessary weight. The withholding of the full Social Impact Assessment obscures the actual human and social costs tied to the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health effects is vital for developments of this magnitude, particularly where community character and functionality may be impacted. By not providing the complete dataset, the application fails to present a thorough evidential basis for evaluating the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the evidence available points to existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to demonstrate compliance with this policy.

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and signifies a failure to satisfy the evidential requirements of the Environmental Impact Assessment process.

In summary, the non-disclosure of the full Social Impact Assessment, combined with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal to introduce large-scale turbines close to the West Lewis coastline poses a significant threat to the area's natural landscape and cultural heritage. This region is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The addition of such industrial structures would create a persistent and overwhelming presence that would irrevocably change this character, leading to a permanent alteration of the landscape.

The assessment presented within the application does not adequately reflect the magnitude of the visual changes that would occur. Given their scale and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and undermining the essential

qualities of naturalness and remoteness. The report fails to convey the true extent of this impact or its significance, particularly within the context of such a sensitive environment.

There are serious methodological issues regarding the selection and representation of visual viewpoints in the assessment. It appears that the chosen viewpoints may not fully represent the most sensitive receptors or potential worst-case scenarios, especially concerning vital cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact has been downplayed, which undermines the credibility of the assessment.

Moreover, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape connected by visual and spatial relationships to the Atlantic horizon. Instead of recognising this interdependence, the assessment treats these assets as isolated, resulting in an incomplete consideration of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, fundamentally altering how heritage assets are perceived and diminishing their connection to the natural horizon. This situation presents not only a visual impact but also a broader cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the preservation of natural places and historic assets. The anticipated scale of change is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment undermines any assertion of compliance with policy guidelines.

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. Thus, the resulting changes would be fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the extent of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the safeguarding of this vital landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is notably deficient and lacks the necessary detail to evaluate potential environmental effects adequately. The initiative necessitates significant seabed preparation and

installation work in a high-energy Atlantic setting, yet it does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application is predicated on the future preparation of mitigation and contingency measures post-consent, thereby obstructing any meaningful assessment of their potential adequacy or effectiveness.

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

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

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

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

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

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding its impact on fisheries and marine life, particularly due to its inadequate assessment of ecological and socio-economic effects. The coastal waters off West Lewis are home to a vibrant marine ecosystem and support a thriving fishing industry, yet the application does not convincingly show how

these activities and habitats can be preserved without considerable disruption.

A critical flaw in the application is the presumption that fishing activities can be relocated without repercussions. There is no evidence provided that alternative fishing grounds are available or capable of absorbing the additional fishing pressure. This lack of information is crucial, as it may lead to overfishing in other areas and could have severe economic repercussions for the local fishing fleet. The absence of a thorough and evidence-based assessment inhibits a proper understanding of the implications for fisheries and the livelihoods dependent on them.

Moreover, the proposal poses significant risks to marine species, particularly due to underwater noise generated during construction activities. The anticipated high-energy hammer piling over a prolonged period is likely to disrupt marine life across extensive distances, particularly affecting species such as dolphins. The predicted disturbance to a substantial portion of the local bottlenose dolphin population is concerning; however, the application inadequately addresses these impacts, downplaying their importance without sufficient evidence.

Additionally, the application exhibits a contradiction by acknowledging the necessity of licenses to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency calls into question the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially when anticipated harm necessitates legal authorisation.

The assessment also neglects to account for cumulative impacts that may arise from various pressures, including noise, habitat disturbance, 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 the socio-economic landscape.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It fails to establish that the development can coexist with current marine users or avoid significant negative effects on marine biodiversity, thus undermining any argument for the proposal being a form of sustainable development.

In summary, the deficiencies surrounding the evidence of fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the assessment render it incomplete and unreliable. These shortcomings prevent a comprehensive evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines alongside the onshore works fails to provide a complete picture, as it treats these components separately despite their intrinsic connection. This fragmented approach obscures the full extent of environmental and socio-economic impacts of what is essentially a single integrated project. The onshore

works entail cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. Notably, excavation activities will take place in areas of deep peat, particularly within Barvas Moor, which is crucial both as a significant carbon store and as an ecologically sensitive habitat. The absence of a comprehensive assessment of these impacts prevents a thorough understanding of the overall environmental footprint of the project.

Moreover, the application's exclusion or deferral of onshore impacts hampers the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the disjointed assessment of offshore and onshore elements leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities. Significant risks to sensitive habitats, such as machair systems and peatland environments, have not been adequately addressed, which raises concerns regarding biodiversity protection and compliance with policy requirements. The application does not provide evidence that the impacts on these habitats have been fully assessed or that effective avoidance measures have been implemented, thus presenting a clear evidential gap.

The proposal further generates concerns around carbon balance, as the disturbance of peatland could release stored carbon, creating a carbon debt that contradicts the goals of renewable energy development. The failure to adequately address this aspect or to demonstrate that the overall carbon balance remains beneficial is a critical oversight. Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence that the necessary consents or processes have been initiated, which casts doubt on the deliverability and lawful implementation of the project.

From a policy standpoint, the disjointed assessment of the project as a whole undermines the protection of peatlands, habitats, and land use interests, conflicting with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated adds further weakness to the application. In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife is a significant flaw within the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will be visible over considerable distances, creating an intrusive "wall of light" effect on the western horizon that will fundamentally change the night-time landscape.

Furthermore, the proposal fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning as dark skies are essential to the identity of the region and to the growth of emerging sectors like astro-tourism. By neglecting these impacts, the assessment reveals a significant gap in the overall landscape and environmental evaluation.

Equally alarming is the lack of any investigation into the impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting, which can disorient them and increase their risk of collision. The absence of a lighting impact assessment or a phototaxis study means there has been no consideration of how aviation lighting might affect these birds or contribute to their mortality rates.

This issue is worsened by the overreliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. Even species like Kittiwakes, known to forage or migrate at night, are at risk of disorientation from artificial light, but this danger has not been evaluated. The lack of site-specific data regarding night-time activity leads to a critical misunderstanding of ecological impacts.

Without a thorough examination of nocturnal consequences, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The required evidential standard to dismiss adverse effects beyond reasonable scientific doubt is not achieved, necessitating the precautionary principle and preventing a lawful determination.

From a policy standpoint, this absence conflicts with the National Planning Framework 4 concerning the safeguarding of natural environments and environmental quality. It also diminishes the comprehensive evaluation of landscape and seascape impacts, given that the night-time character is a fundamental aspect of the environment.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife represents a considerable evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of supporting a lawful decision.

TOURISM

The evaluation of tourism impacts is significantly lacking and does not address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and its sense of remoteness. The application notes that 86% of visitors are attracted by the scenery; however, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

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

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

In a community like the island, which has limited economic diversification, the neglect of tourism impact assessments has broader consequences 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 evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the obligation to show net benefit. It also contradicts strategic objectives that designate tourism as a key growth sector and lacks sufficient evidence for the competent authority to evaluate the economic repercussions of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, as it does not align with statutory duties, national policy, or evidential standards. This application echoes the core issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a thorough and reliable evidential basis.

Critical gaps in baseline data are evident, alongside the continued use of an undefined design envelope and an overreliance on unspecified mitigation measures. Key impact

pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects and residual impacts.

There are also clear procedural failures associated with the proposal. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment represents a material omission. These deficiencies impede the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Environmental risks remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent, and the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, preventing a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

Very concerned about the long term health impacts of these massive constructions near our shorelines!

We have NOT been adequately informed or consulted and listened to as residents of these islands! Who exactly will benefit? What are the long term land, sea, individual,

generational, human and nature implications ahead? As well as the visual monstrosities that they are!!!!

What are the actual benefits (truth not lies) for the island, and what are the alternatives? These concerns should be addressed robustly and transparently before any of this goes ahead!

Yours faithfully,

[Redacted]

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