

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 regimes. My concerns stem from a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is to be situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale, proximity, and design of this proposal raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application is deficient in providing a solid evidential foundation for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Many essential aspects of the proposal remain undefined. The flexible design framework employed complicates an accurate assessment of likely significant effects, while the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation does not afford a comprehensive understanding of the potential environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust evidence to support them.

There are significant conflicts with established policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national standards aimed at safeguarding biodiversity, climate objectives, and environmental integrity. Such conflicts directly affect the statutory tests necessary for granting consent and impair the competent authority's ability to conclude that the development aligns with policy requirements.

The unprecedented scale of this proposal, with large turbines positioned dangerously close to the shoreline, raises major concerns about landscape capacity, visual dominance, and environmental repercussions. Together, the lack of sufficient 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 factors, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

Collectively, the dependence on an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and rigorous evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposal suffers from significant deficiencies in the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of viable alternatives based on their environmental impacts, the application provides a narrative account of the project's

evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging ones.

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

These shortcomings also extend to cable routing and landfall assessments, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and insufficient 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 demonstrate that environmental harm has been adequately minimised through considerations of site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hampers 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 definitively stated that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies significantly undermine compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a material omission, leading to the overall conclusion that the application has not been thoroughly evaluated and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species has significant deficiencies, leading to an incomplete understanding of the ecological receptors in the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the baseline data used is inadequate. The methodologies employed do not effectively capture important aspects such as species presence, behaviour, and habitat use, which undermines the assessment's ability to evaluate impacts accurately.

A notable gap is the treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise their use of coastal areas for foraging and movement. Without a proper assessment of their core foraging range and behaviour, the potential impacts of construction activities, noise, and increased human

activity remain insufficiently evaluated. This flaw weakens the conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks is hampered by the over-reliance on aerial surveys, which carry a significant risk of detection bias, particularly under Atlantic conditions. Such reliance likely leads to an underestimation of their presence, especially in light of established land-based observations that demonstrate frequent use of these waters. The failure to integrate or adequately consider this data results in a further incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, there remains a level of uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out in the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This uncertainty prevents the exclusion of adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. Given these circumstances, it is clear that consent cannot be granted lawfully.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies impede a robust evaluation of impacts on marine ecology and protected species and contribute to the overall conclusion that the application lacks a sound evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to satisfy the evidential threshold necessary to establish no adverse effect on the integrity of protected sites. This deficiency is underscored by the presence of contradictory conclusions, coupled with significant gaps in data and limitations inherent in the modelling approaches utilised. As a result, the standard of beyond reasonable scientific doubt has not been met, thereby engaging the precautionary principle and hindering a lawful conclusion in support of consent.

The ornithological assessment is fundamentally flawed, exhibiting substantial gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. Yet, the application fails to meet the required evidential standard demonstrating that these species will not face adverse effects. Key foraging areas and migratory pathways are situated within the proposed development, yet the assessment neglects to thoroughly evaluate the potential implications of displacement, collision risk, or habitat loss.

There exists a critical contradiction within the application, whereby the developer

asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary in instances where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. The assessment lacks adequate evidence to ensure that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore, the significance of these feeding grounds is not comprehensively addressed, and the reliance on modelling approaches introduces uncertainty, particularly for species such as Kittiwakes and Fulmars that are in critical decline. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are inadequately understood.

The placement of turbines within a recognised migratory corridor presents an additional and considerable risk, effectively establishing a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of sustained mortality within this corridor or consider the potential impact on species with relatively small global populations.

The identified deficiencies also reflect a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected directly conflicts with national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological inadequacies, and lack of sufficient evidence. Consequently, these shortcomings hinder a thorough evaluation of the impacts and lead to the overarching conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, represents a major shortcoming in the assessment. These sites serve as active places for burial and spiritual practice; however, they have been categorised merely as static features. This oversight fails to acknowledge their ongoing use and significance, as well as the potential impact of development on their setting. Such a mischaracterisation leads to an inadequate evaluation of cultural effects and neglects their importance within community life.

Furthermore, the assessment overlooks intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the community's enduring relationship with the coastal environment. These elements are vital to the area's identity and have been wholly disregarded, marking a significant omission. The lack of consideration for these factors means the cultural impact of the proposed development cannot be fully comprehended.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population, which possesses distinct characteristics of an Indigenous People, has not been granted the opportunity for Free, Prior and Informed Consent. The absence of this meaningful engagement diminishes the credibility of the assessment and contradicts established principles of participation in decisions that affect cultural and environmental interests.

Additionally, a critical procedural gap exists due to the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission is significant enough to prevent a lawful determination.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to take into account both tangible and intangible heritage, and to recognise living cultural practices, represents a clear deviation from policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a considerable evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not present a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding the assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This absence creates a notable evidential gap, hindering both public understanding and the competent authority's capacity to grasp the full scope of social risks highlighted in the developer's research.

Summaries that are available reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are therefore not mere speculation. Nonetheless, the lack of disclosure of the complete assessment limits proper scrutiny and undermines the significance of these findings in the decision-making process.

The proposal is also viewed as a threat to community identity and cohesion, with findings indicating “cultural loss” identified in the developer's own research. Despite these critical insights, they have not been sufficiently integrated into the main application or given the weight they deserve. The decision to withhold the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this scale, particularly in relation to community character and functioning. Without the complete dataset, the application fails to provide an adequate evidential basis to assess the balance between potential benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the available evidence suggests that there are existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to demonstrate compliance with this policy.

The implications of these procedural shortcomings are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the absence of the full Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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 evaluation of the proposal is materially deficient due to the lack of detail concerning construction and pollution risks. There are substantial seabed preparation and installation works planned within a high-energy Atlantic environment; however, the application does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be prepared after consent is granted, which obstructs any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns, particularly in light of the sensitivity of the environment in question. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, it fails to

provide adequate detail on preventive, control, or monitoring measures.

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

Moreover, the absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application undermines the competent authority's ability to evaluate whether appropriate safeguards exist for addressing pollution events. This introduces procedural risks and compromises the assessment of environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and their mitigation must be assessed prior to granting consent, and the absence of such information renders a lawful determination unattainable. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal raises serious concerns regarding its impact on fisheries and marine life, particularly as it pertains to the waters off the West Lewis coast, which sustain a diverse marine ecosystem and an active fishing industry. The application does not adequately demonstrate that the ecological and socio-economic needs of these areas will be protected or maintained without significant disruption.

A major issue lies in the assumption made by the application that fishing activity can be displaced without any consequences. There is no evidence provided that alternative fishing grounds are available, accessible, or capable of supporting the additional pressure that displacement would create. This absence of information is critical, as it raises the risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a clear and evidence-based evaluation, the potential impacts on both fisheries and local livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species due to the underwater

noise generated during construction. High-energy hammer piling over an extended period is expected to create disturbances that could affect a wide range of species, including dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population should be of serious concern, yet the application downplays the severity of these effects and lacks sufficient supporting evidence.

Moreover, there is an apparent inconsistency within the application, which acknowledges the requirement for licenses to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises issues of compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

The assessment further neglects to consider cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise pollution, 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 surrounding them.

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 proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which obstructs any conclusion regarding the sustainability of the development.

In summary, the deficiencies related to evidence on fishing displacement, underestimation of acoustic impacts, and internal inconsistencies make 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 proposal involves the assessment of onshore infrastructure, which is incomplete and does not consider the full range of impacts related to a single integrated project. The offshore turbines and onshore works are closely connected; however, they are evaluated separately, leading to a fragmented view that does not reveal the complete environmental and socio-economic consequences.

The onshore aspects consist of cabling through protected moorland, the construction of a substation near Stornoway, and related access infrastructure across delicate landscapes. These activities entail excavation in areas of deep peat, notably within Barvas Moor, a crucial carbon store and ecologically sensitive area. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By not addressing onshore impacts or postponing their assessment, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact

Assessment process mandates that all project components be evaluated together. However, the division between offshore and onshore elements means the collective impacts on peatlands, habitats, and local 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 prove that impacts on these habitats have been fully evaluated or that suitable avoidance measures are in place, resulting in a significant gap in evidence regarding biodiversity protection.

The proposal also presents issues related to carbon balance. Disturbing peatland releases stored carbon, possibly creating a carbon debt that contradicts renewable energy objectives. This matter is inadequately addressed in the application, which fails to show that the overall carbon balance is advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application does not provide proof that the required consents or processes have been initiated, raising concerns about the project's deliverability and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal includes the introduction of permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change will fundamentally alter the night-time environment of the West Lewis coastline, which is noted for its exceptionally dark skies that are essential to the area's environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment notably lacks any evaluation of the impacts of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This deficiency is particularly concerning given the significance of dark skies to the identity of the region and to emerging tourism sectors like astro-tourism. The failure to address these impacts indicates a clear gap in the overall assessment of both landscape and environmental conditions.

Moreover, the assessment does not consider the effects of artificial lighting on

nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, as phototaxis can lead to disorientation and a heightened risk of collision. The application is lacking a lighting impact assessment or a phototaxis study, thus failing to evaluate how the proposed aviation lighting may impact these species or contribute to increased mortality rates.

Additionally, the reliance on daytime survey data in the ornithological assessment is problematic, as it fails to account for nocturnal activity and its associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data results in a critical gap in the understanding of ecological impacts.

Without an assessment of nocturnal impacts, it cannot be determined whether protected species or designated sites would face adverse effects. The evidential standard required to exclude potential adverse effects beyond reasonable scientific doubt is not met, thus engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, the omission conflicts with National Planning Framework 4 concerning the protection of natural places and environmental quality. This also diminishes the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

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

TOURISM

The proposal involves the development of large-scale offshore infrastructure, yet the assessment of its tourism impacts is materially deficient. It overlooks the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism thrives on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Notably, the application acknowledges that 86% of visitors are drawn by the scenery, but it fails to provide a quantified assessment of how such industrialisation would affect visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, and supports more than 1,000 jobs, accounting for up to 16% of the island's economy. Despite this significant contribution, the application does not explore how the potential industrialisation of the seascape and a decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the area. In the absence of this analysis, it is impossible to ascertain whether the proposed

development would yield a net economic benefit or threaten an established and growing sector.

Furthermore, the assessment neglects to consider the critical role of environmental quality in sustaining tourism. The significance of unspoiled landscapes and dark skies for enhancing visitor experience, as well as the potential for emerging markets like nature-based tourism and astro-tourism, is not addressed. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a significant gap in understanding the effects on an acknowledged and expanding segment of the local economy.

Given the context of an island community that has limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. Moreover, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately assessed as mandated by the Islands (Scotland) Act 2018.

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

Collectively, the inability to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and recognise the economic dependency of the island leads to a considerable evidential gap. This deficiency inhibits a thorough assessment of economic effects and substantiates the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm epitomises a significant shortfall in meeting the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the fundamental 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 latest application, presented under a more robust policy framework, still fails to adequately address concerns regarding biodiversity, peatland protection, landscape integrity, and community wellbeing.

A thorough evidential basis for this application is lacking. There are notable deficiencies in baseline data, the use of an ambiguous design envelope, unspecified mitigation measures, and the failure to address key impact pathways, such as nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island

Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a significant omission. These oversights hinder the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal is at odds with the National Planning Framework 4. It does not adequately demonstrate the safeguarding of biodiversity, natural spaces, and cultural heritage, nor does it provide assurance that health and wellbeing impacts are acceptable. There is also a lack of evidence supporting a net economic benefit, as tourism impact modelling is absent. The failure to properly assess the cumulative impacts of both offshore and onshore components conceals the potential effects on peatlands, carbon balance, habitats, and crofting land.

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

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

In summary, the application is both procedurally and substantively inadequate for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or utilise the appropriate regulatory measures to obtain the necessary 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: A79BE175

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Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation has revealed material deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The development site, located off the west side of the Isle of Lewis, is characterised by an Atlantic-facing coastline, a near-pristine environment, and a rich cultural identity. The scale and proximity of the proposed turbines, along with the design, raise serious concerns about compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a robust evidential basis for a lawful determination. Key environmental data is absent, baseline information is inadequate and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework employed limits the understanding of likely significant effects, and the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to offer a full or informed understanding of the potential environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects, which lack solid evidence.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration presents significant deficiencies in its ornithological assessment, which is flawed due to substantial gaps in evidence and internal contradictions that challenge its conclusions. Situated on the west coast of the Isle of Lewis, an area that supports seabird populations of international importance, the proposal fails to adequately demonstrate that these species, many of which are already in decline, will not experience adverse impacts. The proposed development is located within crucial foraging areas and migratory corridors, yet the assessment does not thoroughly evaluate the risks of displacement, collision, or habitat loss for these birds.

A notable contradiction within the application arises when the developer asserts that there will be no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is intended for situations where significant harm is anticipated. This inconsistency casts doubt on the validity of the assessment and suggests that its conclusions lack support from the evidence provided. The assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The critical nature of these feeding grounds is inadequately considered, and reliance on modelling methods adds uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Moreover, the methodologies employed are likely to underestimate mortality rates, particularly given the incomplete baseline data and the limited understanding of behavioural responses.

The placement of turbines within a known migratory corridor introduces significant risks by potentially obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The application lacks a comprehensive assessment of the long-term consequences of sustained mortality in this corridor and the implications for species with small global populations.

From a regulatory standpoint, the application does not meet the evidential standards required to confirm no adverse effects on the integrity of protected sites. The contradictory findings, coupled with data gaps and limitations in modelling, mean that the necessary standard of proof beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, making a lawful conclusion in favour of consent unattainable.

Furthermore, the identified deficiencies represent a failure to adhere to National Planning Framework 4, which relates to the protection of biodiversity and natural assets. The inability to prove that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable, undermined by methodological weaknesses and insufficient evidence. These shortcomings hinder a comprehensive evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for a determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, notably neglecting the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising heritage as a living element that serves ongoing social, cultural, and spiritual purposes within the community, the application presents it as a collection of isolated, static assets.

There is a critical shortcoming in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet the assessment views them merely as static features. This oversight fails to consider their continued use and meaning, as well as the potential impact of development on their settings. Consequently, the evaluation of cultural effects remains incomplete and overlooks their importance to community life.

Moreover, the application neglects to address intangible cultural heritage elements, including the Gaelic language and traditions, which are central to the identity of the area. The long-standing relationship between the community and the coastal environment is completely disregarded in the assessment, representing a major omission. Without these considerations, the cultural implications of the development cannot be accurately understood.

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

Furthermore, there is a critical procedural oversight in the absence of a compliant Island Communities Impact Assessment, as mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thus hindering a lawful determination.

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the lack of recognition for living cultural practices, clearly deviates from policy requirements.

In summary, the failure to assess living heritage, intangible cultural values, community rights, and statutory obligations has resulted in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for determining the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines near the West Lewis coastline would lead to a continuous industrial presence, fundamentally changing the area's character defined by its open Atlantic horizon and undeveloped nature. This alteration would result in a permanent transformation of the landscape, which has not been adequately assessed in terms of visual impacts.

The application fails to represent the magnitude of the visual change. The close proximity and scale of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, impacting visual amenity and diminishing the naturalness and sense of remoteness in this sensitive landscape. The assessment does not convey the level of this impact or its significance adequately.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that some viewpoints may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This could result in an understatement of the visual impacts, calling the reliability of the assessment into question.

Another deficiency is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that visually and spatially relates to the Atlantic horizon. Instead of recognising this interdependence, the assessment treats these sites as isolated, resulting in an incomplete evaluation of the impact on their setting and cultural significance.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 concerning the protection of natural places and historic assets. The anticipated changes are incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment further undermines claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The turbines' scale, height, and proximity would ensure their presence is dominant and unavoidable. The resulting changes would thus be fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

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

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

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders the evaluation of whether suitable safeguards are in place to respond to pollution incidents. This approach introduces procedural risk and compromises the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent; the absence of such information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts render the assessment materially deficient. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents an incomplete assessment of the onshore infrastructure, failing to address the full extent of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are inextricably linked, yet they have been evaluated separately, leading to a fragmented analysis that obscures

the true scale of both environmental and socio-economic effects.

Included among the onshore elements are the installation of cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The assessment does not comprehensively evaluate these impacts, thus hindering a complete understanding of the project's environmental footprint.

Furthermore, the application's exclusion or deferral of onshore impact assessments obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components together, yet the delineation between offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application fails to demonstrate that a thorough assessment of these habitats has been conducted or that suitable avoidance measures have been instituted, thus revealing a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises concerns about potential conflicts with existing land use and legal rights. The absence of evidence indicating that the requisite consents or processes have been initiated brings into question the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and to demonstrate the protection of peatlands, habitats, and land use interests is in conflict with both the National Marine Plan and National Planning Framework 4. The lack of evidence supporting the avoidance or mitigation of impacts further undermines the application.

In summary, the segmentation of project components, coupled with the absence of a thorough assessment and insufficient evidence regarding environmental and land use impacts, renders this portion of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

There is no assessment of how this lighting impacts visual amenity, landscape

character, or the experiences of residents and visitors. This is particularly concerning considering the significance of dark skies for the area's identity and for emerging sectors such as astro-tourism. The absence of these evaluations represents a serious gap in the landscape and environmental assessment.

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

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

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

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

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

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: 12124A5B

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

Dear Sir/Madam

This letter formally objects to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection is founded on a thorough review of the Environmental Impact Assessment Report and related materials, revealing significant planning, environmental, cultural, and procedural shortcomings. The wind farm is proposed for the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns arise regarding the compatibility of the project with statutory requirements, national policies, and sustainable development principles due to its scale, proximity to the shore, and design.

The application lacks a sufficient evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Moreover, several key elements of the proposal remain undefined. The flexible design framework used complicates the understanding of potential significant effects, while the dependence on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. The proposal contradicts the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate issues, and environmental integrity. These conflicts directly challenge the statutory tests for consent and weaken the competent authority's ability to affirm that the project aligns with policy standards.

The unprecedented scale of the proposal, featuring large turbines in close proximity to the coastline, raises serious concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the deficiencies in information, dependence on undefined mitigation, evidential gaps, and clear policy violations indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a comprehensive, transparent, or reliable overview of the proposal's likely

environmental effects. Central to this inadequacy is the use of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty, hindering 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, restricting both the public's and the competent authority's ability to gauge the true extent of environmental effects.

Additionally, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans, which remain unarticulated at this stage. Seeking consent based on the premise that environmental harm will be mitigated subsequently obstructs a meaningful evaluation of effectiveness or the assessment of residual impacts. Such a deferral of vital information to post-consent phases is procedurally unacceptable, contradicting the essential purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation be clearly established prior to determination.

There are also notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. These issues contribute to uncertainty regarding the scale and significance of impacts, particularly where findings of negligible or non-significant effects are asserted without robust supporting data. The lack of sufficient information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot align with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The application presents significant shortcomings in its assessment of alternatives, failing to adhere to the requirements of the Environmental Impact Assessment regime. Rather than offering a detailed and reasoned evaluation of viable alternatives based on their environmental impacts, it merely recounts the project's development history. This

method does not adequately demonstrate that less damaging options have been properly identified or evaluated in favour of more harmful solutions.

There is a clear absence of transparent and evidence-based comparisons of different offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining environmental effects make this lack of analysis particularly concerning. Consequently, it is impossible to conclude that the proposed siting is the least damaging option.

These inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been thoroughly examined to mitigate impacts on sensitive sites, including culturally and spiritually significant areas like Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of a comparative analysis imply that the application has not effectively applied mitigation by design, instead relying on mitigation measures that would only be implemented after design completion.

As a result, the application does not demonstrate that environmental harm has been adequately minimised through careful site selection, layout, and infrastructure routing. This represents a neglect of the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. In the absence of a comprehensive alternatives assessment, it is not possible to conclude that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, these deficiencies significantly compromise compliance with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a crucial omission that underlines the overall conclusion that the application has not been thoroughly evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a significant deficiency in its assessment of marine ecology and protected species, leading to an unreliable understanding of ecological receptors in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is incomplete. The methodologies used fail to capture the presence, behaviour, and habitat usage of the species accurately, which compromises the evidential foundation necessary for evaluating potential impacts.

One notable oversight is the treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal areas for foraging and movement. By neglecting to assess their core foraging

range and behavioural patterns, the potential effects of construction-related disturbance, noise, and increased activity on otters are not properly evaluated. This lack of consideration undermines any assertions regarding the absence of significant effects on this species.

The assessment also inadequately addresses basking sharks, where reliance on aerial surveys leads to substantial detection bias, particularly in challenging Atlantic conditions. This method is likely to result in an underestimation of the species' presence, especially when compared to land-based observations that indicate regular use of these waters. The failure to incorporate or adequately analyse such pertinent data leads to an incomplete baseline, further weakening the reliability of the conclusions drawn.

Due to these methodological shortcomings, the conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The insufficient baseline data also hinders meaningful assessments of cumulative and indirect impacts, including those arising from seasonal variations and broader ecosystem interactions. This lack of clarity raises concerns about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty created by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, the granting of consent under these circumstances would not be lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings inhibit a comprehensive evaluation of impacts on marine ecology and protected species, ultimately leading to the assertion that the application lacks an adequate evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application has significant flaws in its ornithological assessment, which presents major gaps in evidence and inconsistencies that undermine its findings. The Isle of Lewis's west coast is home to internationally important seabird populations, many of which are already declining. However, the application fails to convincingly show that these species will not be negatively impacted. The development site is situated within critical foraging areas and migratory routes, yet the assessment does not thoroughly consider the risks of displacement, collision, or habitat loss.

There is a notable contradiction within the application. The developer claims that there are no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is typically necessary when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that its

conclusions are not adequately backed by the evidence provided.

Furthermore, the assessment lacks sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The importance of these feeding grounds is not fully addressed, and the reliance on modelling introduces uncertainty, especially for species like Kittiwakes and Fulmars that are in serious decline. The methodologies used are likely to underestimate mortality, particularly given incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines in a recognised migratory corridor adds another serious risk, creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not properly evaluate the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

Regulatory compliance is also questionable, as the application does not meet the evidential standard required to assert that there will be no adverse effect on the integrity of protected sites. The contradictory conclusions, combined with data deficiencies and modelling constraints, indicate that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and inhibits a lawful decision in favour of consent.

Overall, the deficiencies identified reflect a failure to comply with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal at odds with national policy. These issues collectively render the assessment unreliable due to inconsistencies, methodological flaws, and insufficient evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Additionally, the assessment disregards intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are fundamental to the area's identity, yet they are entirely overlooked, creating a significant gap in understanding the true cultural impact of the development.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The concerns surrounding social impacts, health, and wellbeing related to the proposal are profound and merit urgent attention. A significant evidential gap exists due to the lack of transparency in the developer's Social Impact Assessment, which remains unpublished despite having included focus groups with local residents. This omission hinders both public understanding and the competent authority's ability to evaluate the potential social risks highlighted by the developer's own research.

Available summaries reveal that local residents are suffering from measurable stress, anxiety, and concern linked directly to the proposal's scale and proximity. These findings stem from direct community engagement and are thus grounded in reality, yet the lack of access to the comprehensive assessment limits scrutiny and fails to inform the decision-making process adequately.

Additionally, there is a growing perception among residents that the proposal threatens community identity and cohesion, with references to "cultural loss" appearing in the developer's findings. Alarming, these critical social impacts have not been

incorporated into the application or given due consideration, further obscuring the true human and social costs of the development.

Such a lack of transparency disrupts the Environmental Impact Assessment process, as a complete understanding of social, economic, and health ramifications is vital for developments of this magnitude, especially when they could alter community character and functioning. Without the full dataset, the application fails to offer a comprehensive evidential basis to weigh benefits against harms.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence currently indicates existing adverse effects that remain undisclosed. Consequently, the absence of the full assessment prevents any demonstration of compliance with this critical policy.

The procedural implications are equally troubling. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This material omission highlights a significant failure to meet the evidential standards required under the Environmental Impact Assessment regime.

In conclusion, the combination of non-disclosure of the full Social Impact Assessment and the presence of existing adverse impacts leaves the assessment incomplete and unreliable. Such deficiencies obstruct a lawful determination and underscore the reality that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not properly represent the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would establish a continuous industrial presence, significantly altering this character and leading to a permanent and irreversible change in the landscape.

There is also a lack of clarity in the application regarding the magnitude of the visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the extent of this impact or its importance within such a sensitive landscape.

Methodological issues arise from the selection and presentation of visual viewpoints. It appears that the viewpoints may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This may lead to an understatement of the visual impact, which questions the reliability of the assessment.

Moreover, the assessment does not consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting, linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment overlooks their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and their connection to the natural horizon. This change is not merely a visual impact; it represents a broader cultural and spatial harm that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which seeks to protect natural areas and historic assets. The proposed scale of change is at odds with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes the argument for policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resulting changes are fundamental and permanent, rather than something that can be lessened to an acceptable degree through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks is lacking in completeness and fails to provide the necessary detail to evaluate potential environmental effects adequately. The proposal entails extensive seabed preparation and installation operations within a high-energy Atlantic setting, yet it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent, which hinders any thorough evaluation of their sufficiency or effectiveness.

This dependence on unspecified future actions raises significant concerns, particularly given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to disturbances from sediment and contamination. Although the application does acknowledge risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, managed, or monitored.

There is also ambiguity regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. In the absence of reliable modelling and clearly defined management approaches, it remains impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have already been recognised as sensitive within the broader assessment.

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

From a regulatory viewpoint, the postponement of essential environmental safeguards is at odds with the stipulations of the Environmental Impact Assessment framework. Significant effects and mitigation must be evaluated before consent is issued, and without this critical information, a lawful determination cannot occur. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These weaknesses obstruct a thorough evaluation of construction and pollution risks, further reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application exhibits a troubling contradiction, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously claiming that such impacts are negligible. This inconsistency undermines the credibility of the assessment and raises significant concerns regarding adherence to the Habitats Regulations, particularly in instances where potential harm is expected to necessitate legal authorisation.

Moreover, the assessment of fisheries and marine life is notably inadequate, lacking a thorough evaluation of the ecological and socio-economic consequences. The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application fails to convincingly demonstrate that these essential uses and habitats can be preserved or maintained without considerable disruption.

A critical issue is the presumption that fishing activity can be relocated without repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or able to endure added pressure. This significant omission poses risks of overfishing in other locations, which may lead to broader

economic ramifications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the impacts on fisheries and local livelihoods remain inadequately understood.

Additionally, the proposal introduces considerable risks to marine species, especially through the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended timeframe is likely to disturb marine life across considerable distances, affecting species such as dolphins. Concerns arise from the predicted disturbance to a significant portion of the local bottlenose dolphin population, yet the application tends to downplay the importance of these effects without adequate supporting evidence.

The assessment also neglects to consider the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not capture the full range of impacts from what is effectively a single integrated project. The offshore turbines and onshore works are inherently interconnected, yet their separate assessments lead to a fragmented understanding that clouds the true extent of the environmental and socio-economic consequences.

Onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, a vital carbon store and ecologically important habitat. Without a thorough evaluation of these impacts, it is impossible to grasp the overall environmental footprint of the project.

By neglecting to assess the onshore impacts or postponing that evaluation, the application hampers the analysis of cumulative effects. The Environmental Impact Assessment process demands that all aspects of a project be reviewed in tandem, yet

the disjointed examination of offshore and onshore components obscures the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are serious risks to sensitive habitats, including machair systems and peatland areas, which are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been implemented. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance associated with the proposal. Disturbance of peatland releases stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

Additionally, the routing of 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 initiated, which brings into question the deliverability and lawful implementation of the project.

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

The combination of separating project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts makes this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal's failure to assess the impact of artificial lighting on dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline features exceptionally dark skies, which are vital for the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, visible from great distances, would create an intrusive "wall of light" effect that would drastically change the night-time environment.

There is no evaluation of how this lighting would affect visual amenity, landscape character, or the experiences of residents and visitors, despite the importance of dark skies to the identity of the area and the burgeoning sector of astro-tourism. This omission creates a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is a troubling lack of consideration for nocturnal wildlife impacts. Species such as 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 a heightened risk of collisions. The application does not provide any assessment of lighting impacts or conduct a phototaxis study, failing to explore how the proposed aviation lighting might adversely affect these species or contribute to increased mortality rates.

This shortcoming is aggravated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and its associated dangers. Kittiwakes, for example, may forage or migrate at night and are also susceptible to disorientation from artificial lighting, yet this risk remains unexamined. The absence of site-specific night-time data leaves a critical void in understanding the ecological impacts involved.

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

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

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

TOURISM

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

Since 2017, tourism has seen substantial growth, increasing from £65 million to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not model the potential effects of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added or the resilience of the wider economy. Without this analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or harm an established and thriving sector.

The assessment neglects to acknowledge the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience and developing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, leading to a considerable gap in understanding the impacts on this recognised and expanding segment of the local economy.

In a community like the Isle of Lewis, which has limited economic diversification, the failure to evaluate the impacts on tourism has far-reaching implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately assessed as required by the Islands (Scotland) Act 2018.

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

In summary, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that influence visitor behaviour, and recognising the island's economic dependency result in a significant evidential gap. This hampers a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties and national policy. It echoes the central concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This application, although presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still falls short.

There are significant shortcomings in the evidential basis for this application. The absence of complete baseline data and the continued reliance on an undefined design envelope raise serious concerns. Moreover, the unspecified mitigation measures and the lack of consideration for key impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—further complicate the assessment. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects and any residual impacts.

Procedural failures are also evident in this application. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands

(Scotland) Act 2018, and the failure to provide a comprehensive Social Impact Assessment represents a significant omission. These shortcomings inhibit the competent authority from fully evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal contradicts the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it show that health and wellbeing impacts are acceptable. The absence of tourism impact modelling also undermines claims of net economic benefit. A thorough assessment of the cumulative impact from both offshore and onshore elements has not been conducted, leaving uncertainties regarding the effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with the proposal remain uncertain and could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are lacking in completeness and are inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal would result in considerable 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 the negative impacts on tourism represent enduring effects that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The scale of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or utilise relevant regulatory measures to compel the submission of the necessary information.

Additional Comments

The impact of multiple turbine applications cannot be under estimated, the destruction of such pristine landscapes, which tourism & livelihoods depend on. The environmental destruction, pollution, detrimental effects on seabirds & all sea life are being overlooked in order to make shareholders money. I consider Lewis home, where I was brought up surrounded by my father's family.

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: 169F8877

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 lacks crucial details and does not adequately outline the potential environmental effects of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions or configurations, creates considerable uncertainty. This uncertainty undermines the assessment's integrity, making it impossible to apply a worst-case scenario consistently. Consequently, the impacts described may not accurately represent the final development, leaving both the public and the competent authority unaware of the actual environmental effects.

Moreover, the application places significant reliance on unformed mitigation measures, monitoring strategies, and management plans. Seeking consent based on promises of addressing environmental harm at a later stage hinders any meaningful evaluation of effectiveness or residual impacts. This postponement of critical information until after consent is granted contradicts the fundamental principles of the Environmental Impact Assessment regime, which requires that significant effects and mitigation are clearly defined before any determination.

There are also major gaps in evidence, such as insufficient baseline data, methodological limitations, and reliance on assumptions instead of site-specific facts. These issues lead to uncertainty about the impact scale and significance, particularly where claims of negligible or non-significant effects lack strong supporting data. The insufficient information restricts a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainties that do not align with statutory requirements.

As a result, the application does not meet the evidential standards 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. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including biodiversity protection and environmental integrity, as it fails to show that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The inadequacy in the assessment of alternatives significantly undermines the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of viable alternatives based on environmental effects, the application provides a narrative of project evolution that fails to demonstrate that less harmful options have been properly identified and assessed in favour of more damaging solutions.

There is a notable absence of transparent or evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. The application does not establish that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. Considering the sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in assessing impact, the lack of such an analysis hampers any conclusion that the proposed siting represents the least damaging option.

Deficiencies are also apparent in the cable routing and landfall assessment. There is inadequate evidence suggesting that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The lack of a clear avoidance strategy, combined with the absence of comparative analysis, indicates that mitigation by design has not been applied, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, obstructing the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is not possible to conclude that the proposal is sustainable or compliant with policy requirements.

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

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

undermined.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is significantly lacking and does not provide the transparency necessary for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, but the full report remains unpublished. This creates a serious evidential gap, making it impossible for both the public and the competent authority to grasp the full extent of the social risks highlighted by the developer's own research.

Summaries that are available suggest that residents are already experiencing significant stress, anxiety, and concern due to the scale and proximity of the proposal. These effects are based on direct engagement rather than speculation. However, the absence of the complete assessment hinders a thorough examination of these findings and restricts the ability to ascertain their importance in the decision-making process.

There is also an indication that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” mentioned in the developer’s own findings. Nevertheless, these impacts have not been adequately incorporated into the main application or given proper consideration. Withholding the full Social Impact

Assessment clouds the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be at risk. By failing to provide the complete dataset, the application does not establish a thorough evidential foundation for weighing the benefits against the harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and minimise harm, yet existing evidence points to adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy cannot be established.

The procedural implications are substantial. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a significant flaw within the application and a failure to satisfy the evidential criteria of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing negative impacts, renders the assessment inadequate and unreliable. This situation obstructs a lawful determination and supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly lacking and does not adequately account for the extent of change or the sensitivity of the environment. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to accurately depict the magnitude of visual change. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and undermine the defining qualities of naturalness and remoteness. The assessment does not convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise in the selection and presentation of visual viewpoints. Evidence suggests that the viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites

and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a wider landscape setting connected visually and spatially to the Atlantic horizon. The assessment treats these assets in isolation rather than acknowledging their interdependence, resulting in an incomplete analysis of the impacts on their setting and cultural significance.

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

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The magnitude of change contradicts the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any 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 dominant and unavoidable. As a result, the change is fundamental and permanent, rather than reducible to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant shortcomings regarding the assessment of construction and pollution risks, which are crucial for understanding likely environmental effects. It includes extensive seabed preparation and installation works within a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. The application instead depends on mitigation and contingency measures that are to be prepared after consent, thereby hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly troubling, considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. The application does acknowledge risks such as sediment mobilisation

and the potential for accidental chemical or oil spills, but it fails to supply sufficient detail on how these will be prevented, controlled, or monitored effectively.

Uncertainty also surrounds 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 further extends to potential effects on marine species and habitats already identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs any evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of crucial environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are assessed prior to consent; the absence of this information means that a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

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

Moreover, the proposal poses significant risks to marine species, notably through underwater noise generated during construction. The use of high-energy hammer piling

for extended periods is expected to disturb marine life across large distances, notably affecting species such as dolphins. The anticipated disruption to a substantial portion of the local bottlenose dolphin population presents serious concerns, yet the application downplays these effects, lacking adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project lacks completeness, particularly concerning the onshore infrastructure, which is critical to understanding the full range of impacts associated with this integrated project. The offshore turbines and onshore works are fundamentally interconnected, yet the current assessment treats them separately. This fragmented approach obscures the true scale of the environmental and socio-economic consequences.

The onshore components encompass the installation of cabling across protected moorland, the construction of a substation close to Stornoway, and necessary access infrastructure that traverses sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive area. The application fails to provide a comprehensive assessment of the impacts on these environments, leading to an incomplete understanding of the overall environmental footprint of the project.

Moreover, the exclusion or deferment of onshore impact assessments prevents a thorough evaluation of cumulative effects. The Environmental Impact Assessment

process necessitates that all aspects of a project be considered collectively; however, the division between offshore and onshore elements results in an inadequate understanding of the combined impacts on peatlands, habitats, and local communities.

Additionally, there are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not convincingly demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, resulting in a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this concern or prove that the overall carbon balance remains favourable.

Furthermore, routing the infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not show that the necessary consents or processes have been initiated, calling into question the project's deliverability and legality.

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

In summary, the disjointed evaluation of project components, the lack of a comprehensive assessment, and the absence of evidence concerning environmental and land use impacts render this part of the application incomplete and untrustworthy, obstructing lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the principles of sustainable development, particularly when assessed against statutory duties, national policy, and evidential standards. It echoes the primary concerns that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. Now, however, it is presented against a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis of the application. Critical gaps exist in baseline data, the design envelope remains undefined, and reliance on unspecified mitigation measures raises concerns. Furthermore, important impact pathways have been overlooked, including those affecting nocturnal wildlife, the full onshore infrastructure, and tourism implications. The Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely

significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment is a significant omission. These issues impede 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. It fails to adequately protect biodiversity, natural places, and cultural heritage, does not 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 effects of both offshore and onshore components have not been thoroughly assessed, leaving concerns about impacts on peatlands, carbon balance, habitats, and crofting land unaddressed.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, along with instances of internal inconsistency, contribute to the failure to meet the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, preventing a lawful determination that the impacts are acceptable.

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

When considered collectively, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct the possibility of a lawful, evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke relevant regulatory provisions to require the submission of the necessary information.

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

Additional Comments

I would like to raise my personal objection to this windfarm proposal. Firstly we in Scotland already generate enough electricity through renewables. We do not need this windfarm for our energy it is only being proposed to provide power down in England and we do not have the infrastructure to cater for the transmission south.

The power has to be stored because unlike conventional power stations it cannot just be turned on and off and so there have to be storage battery sites which in turn impact

on the environment and communities close by not only in the construction phase but also potentially with fire risk.

In my opinion this is another case of where big business is chasing yet more profit at the expense of our countryside, wildlife and visual amenities and it should be stopped.

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: 0B84C296

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline. This introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact.

The application does not provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The use of a flexible design framework prevents a clear understanding of likely significant effects, while the reliance on mitigation measures that have not yet been specified means their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive conflicts with policy. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. Such conflicts directly affect the statutory tests required for consent and undermine the ability of the competent authority to conclude that the development is acceptable in policy terms.

Given the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. In these circumstances, the precautionary principle must apply. The development is located off the west side of the Isle of Lewis, an area defined by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns raised regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development are fundamental.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency to accurately reflect the potential environmental consequences of the proposal. A flexible Project Design Envelope has been employed, which does not commit to definitive turbine dimensions, layouts, or configurations. This approach

introduces considerable uncertainty and obstructs the effective application of a worst-case scenario analysis. As a result, the integrity of the assessment is compromised, leading to a situation where the impacts detailed may not correspond to the actual development, thus hindering both public comprehension and the understanding of the competent authority regarding the real environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain unspecified. As consent is sought with the expectation that environmental harm will be addressed later, this creates an impediment to a genuine evaluation of the effectiveness of such measures and the assessment of residual impacts. This postponement of crucial information to post-consent phases is not procedurally acceptable and contradicts the aims of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation must be clearly outlined before a decision is made.

Moreover, there are considerable evidential shortcomings, including inadequacies in baseline data, methodological limitations, and a reliance on assumptions in lieu of site-specific evidence. These issues lead to uncertainty about the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without solid supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot align with statutory requirements.

Consequently, the application does not meet the evidential standards mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises concerns related to the precautionary principle, especially in the context of protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it fails to prove that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and robust evaluation of environmental effects, leaving the competent authority ill-equipped to make an informed decision based on the information provided.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant deficiencies, characterised by substantial gaps in evidence and contradictions that undermine its validity. The application does not demonstrate, to the requisite evidential standard, that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing decline, will not suffer adverse effects. The proposed development is situated within crucial foraging areas and migratory routes, yet the assessment fails to adequately evaluate the risks associated with

displacement, collision, or habitat loss.

There exists a fundamental inconsistency within the application itself. The developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises serious concerns about the reliability of the assessment and suggests that its conclusions lack proper substantiation from the underlying evidence. Additionally, the assessment does not sufficiently establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It does not fully take into account the significance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially when baseline data is lacking and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor further compounds these risks, as it effectively creates a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and the potential impact on species with relatively small global populations have not been adequately assessed.

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

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

In summary, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. These shortcomings inhibit a thorough evaluation of impacts and culminate in the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented in the application significantly underrepresents the cultural heritage and community identity associated with the West Lewis coastline. This area should be recognised as a living cultural landscape, where the environment, language, tradition, and community are fundamentally interconnected. Instead, the application adopts a reductive viewpoint, treating heritage merely as a collection of isolated and

static assets, neglecting to acknowledge their ongoing social, cultural, and spiritual significance to the community.

A notable shortcoming is 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; however, they are mischaracterised in the assessment as static features. This oversight disregards their continued use and meaning, as well as the implications of development on their setting. Such a misrepresentation leads to an inadequate evaluation of cultural impacts, ignoring the essential role these sites play in community life.

Moreover, the assessment overlooks intangible cultural heritage elements, including the Gaelic language and traditions, along with the long-standing relationship the community has with the coastal environment. These factors are integral to the area's identity, yet they 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, recognised as possessing a distinct cultural identity akin to that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to align with established principles of participation in matters affecting cultural and environmental interests.

Furthermore, a critical procedural error is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment inhibits the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission is significant enough to prevent a lawful determination regarding the application.

From a policy standpoint, these inadequacies place the proposal at odds with the National Planning Framework 4, particularly concerning the protection of historic assets and sites. The oversight in considering both tangible and intangible heritage, alongside the disregard for living cultural practices, represents a clear deviation from the stipulated policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural values, community rights, and adherence to statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application does not provide an adequate foundation for assessing the true cultural cost of the proposal.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not account for the full impacts of what constitutes a single integrated project. The offshore turbines and

onshore works are interdependent but are evaluated separately, leading to a fragmented understanding of the environmental and socio-economic effects.

Onshore activities include cabling across protected moorland, construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These activities involve excavation in deep peat areas, especially within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By not assessing onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. However, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully clear.

There are significant risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not show that impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been taken. This creates a gap in evidence regarding biodiversity protection.

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

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence that the necessary consents or processes have been started, raising concerns about the project's deliverability and legal compliance.

From a policy standpoint, the failure to evaluate the project as a whole and to show protection 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 project components, lack of thorough assessment, and absence of evidence on environmental and land use impacts render this section of the application incomplete and unreliable, obstructing a lawful decision.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to consider the assessment of dark skies and nocturnal wildlife, representing a significant omission. The proposed installation of

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

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the region's identity and its emerging tourism sectors, such as astro-tourism, this omission is particularly concerning. The lack of consideration for these effects leaves a clear gap in the landscape and environmental assessment.

More importantly, there has been no evaluation of the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not provide any lighting impact assessment or phototaxis study, failing to address how the proposed aviation lighting may influence these species or raise mortality rates.

The situation is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, the omission contravenes National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against legal obligations, national policy, and evidence standards. This application mirrors the core issues that

led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was noted. It is presented now under a more robust policy framework that places additional emphasis on biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are significant gaps in the evidential basis for this application. It lacks comprehensive baseline data, utilises an ambiguous design envelope, depends on unspecified mitigation measures, and omits crucial impact pathways related to nocturnal wildlife, the full extent of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Moreover, procedural deficiencies are evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, and the failure to provide a complete Social Impact Assessment is a substantial omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal directly contradicts National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. Furthermore, it fails to show that the health and wellbeing impacts are acceptable and cannot substantiate a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of offshore and onshore components have not been assessed properly, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

There are unresolved environmental risks that remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

In summary, the application is fundamentally unfit for determination both procedurally and substantively. The extensive information deficiencies, along with policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application is refused entirely.

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: 2EF92D80

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant deficiencies in planning, environmental considerations, cultural factors, and procedural compliance. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely unspoilt environment, and rich cultural heritage. The proposal raises serious concerns about its alignment with statutory obligations, national policies, and the principles of sustainable development.

The application lacks a robust evidential foundation necessary for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and various critical aspects of the proposal remain undefined. The reliance on a flexible design framework obscures an understanding of potential significant effects, while the dependence on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed assessment of the environmental, cultural, or community implications, and the assertions of negligible or non-significant effects lack solid evidence.

There are evident and significant conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and community health and wellbeing. It does not prove that it meets national standards for protecting biodiversity, climate interests, and environmental integrity. These policy inconsistencies directly impact the statutory tests required for consent and jeopardise the ability of the relevant authority to deem the development acceptable according to policy guidelines.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises substantial concerns regarding landscape capacity, visual dominance, and environmental repercussions. The lack of adequate information, the reliance on undefined mitigation strategies, evidential weaknesses, and evident non-compliance with policy collectively indicate that the application is deficient and does not support a lawful determination. In light of these factors, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

These methodological shortcomings mean that any conclusions regarding negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of sufficient baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and interactions within the broader ecosystem. This leads to uncertainty regarding the true extent of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The level of uncertainty introduced is such that it precludes the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In these circumstances, consent cannot be granted lawfully.

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

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 assessment of the impacts on seascape, landscape, and visual characteristics is fundamentally inadequate, failing to accurately capture the extent of change or the sensitivity of the environment. The character of the West Lewis coastline is marked by its unspoiled Atlantic horizon and a pronounced sense of remoteness. The proposed

introduction of large-scale turbines in close proximity to the coastline would establish a continuous industrial presence, fundamentally transforming this unique character and leading to a permanent alteration of the landscape.

There are significant shortcomings in how the visual impacts have been represented. The scale and closeness of the turbines would dominate views from residential areas, historic sites, and well-frequented coastal locations, adversely affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The evaluation does not adequately communicate this impact or its significance within the context of such a sensitive landscape.

Moreover, methodological issues arise from the choice and portrayal of visual viewpoints. Evidence indicates that the selected viewpoints may not sufficiently represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage locations and high-value landscapes. This lack of comprehensive representation raises concerns that the visual impact may have been minimised, thus questioning the reliability of the assessment.

A further critical omission is the failure to examine the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of an integrated landscape setting that is visually and spatially connected to the Atlantic horizon. The assessment regards these assets in isolation, neglecting their interrelatedness and leading to an incomplete appraisal of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage sites are perceived and severing their link to the natural horizon. This not only signifies a visual impact but also inflicts broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural environments and historical assets. The proposed scale of change is inconsistent with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a thorough worst-case scenario assessment further weakens any assertions of compliance with policy requirements.

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 overwhelmingly dominant and unavoidable. Consequently, the change is fundamentally permanent, rather than reducible to an acceptable level through mitigation measures.

Overall, the assessment does not reliably portray the extent of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies hinder an accurate evaluation and support the conclusion that the proposal is inconsistent with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate and lacks the necessary detail to evaluate potential environmental effects. The project entails significant seabed preparation and installation activities in a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. The application relies on mitigation and contingency measures that are to be formulated after consent has been granted, which hinders any meaningful assessment of their potential effectiveness.

This dependence on unspecified future measures raises particular concerns due to the sensitivity of the local environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to provide adequate details on how these risks will be managed, controlled, or monitored.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty affects potential impacts on marine species and habitats that have already been identified as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This creates procedural risks and compromises the competent authority's capacity to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before consent is granted, and if this information is lacking, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of specified mitigation measures, detailed management plans, and uncertainty regarding possible impacts make the assessment materially deficient. These deficiencies obstruct a thorough evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal's assessment of marine life and fisheries is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic effects. The coastal

waters of West Lewis are home to a rich marine ecosystem and an active fishing industry, yet the application does not sufficiently demonstrate that these habitats and uses can be protected or sustained without major disruption.

One of the critical concerns is the assumption that fishing activities can be displaced without significant repercussions. The application lacks evidence that there are alternative fishing grounds which are accessible and can handle additional fishing pressure. This gap is particularly important, as the potential for displacement could lead to overfishing in other areas, with broader economic implications for the local fishing fleet. Without a comprehensive and evidence-based analysis, the impacts on fisheries and the livelihoods that depend on them remain unclear.

Furthermore, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is expected to cause disturbances across large distances, impacting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises significant concerns; however, the application downplays these effects without providing adequate supporting evidence.

There exists an apparent contradiction within the application, where the necessity for licenses to allow harm to European Protected Species is acknowledged, yet the impacts are simultaneously characterised as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal approval.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal includes the introduction of 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 alteration fundamentally changes the night-time environment of the West Lewis coastline, an area noted for its exceptionally dark skies, which are crucial for 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 both residents and visitors. Dark skies hold considerable importance for the area's identity and for burgeoning sectors such as astro-tourism, and this omission represents a clear gap in the Environmental Impact Assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to investigate how the proposed aviation lighting may affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it does not account for nocturnal activity or associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a crucial 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 be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, the omission contradicts National Planning Framework 4, which addresses the protection of natural places and environmental quality. This gap also undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an essential aspect of the environment.

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

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.

Additional Comments

The impudence of this company to use a Gaelic name for this blight on the island. Scotland already has sufficient wind power for its needs. There's already an ugly proliferation of these turbines in the Highlands. There's already owners pay peanuts to the local population, which raking in huge profits. If England needs more power build these in Norfolk and around Peterborough. It's not just turbines blighting our beautiful scenery - they have to connect to the grid with pylons, and cables that regularly kill swabs and birds of prey.

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: 2AA47173

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment frameworks. The objection is informed by an examination of the Environmental Impact Assessment Report and its associated documents, revealing material deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale and design of the proposal, along with its proximity to the shoreline, raise significant concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

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

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

The unprecedented scale of the proposal in this area, with large turbines located in close proximity to the shoreline, raises serious concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the shortcomings of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or dependable evaluation of the proposed development's environmental consequences. A significant concern is the use of a flexible Project Design Envelope, which lacks commitment to precise turbine specifications, configurations, or layouts. This introduces considerable uncertainty and obstructs a thorough application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately depict the development that will eventually be constructed, which hampers both public understanding and the competent authority's ability to grasp the genuine extent of environmental effects.

Moreover, the application places excessive reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As consent is sought under the premise that any environmental harm will be rectified in the future, this prevents any meaningful assessment of their efficacy or an evaluation of residual impacts. This deferral of crucial information to post-consent phases is procedurally unacceptable, contradicting the intent of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation are clearly identified prior to determination.

There are also notable evidential deficiencies, with gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This generates uncertainty about the scale and significance of impacts, particularly when negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory obligations.

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 does not demonstrate alignment with National Planning Framework 4, specifically its requirements related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application exhibits significant deficiencies in its assessment of alternatives, failing to satisfy the statutory requirements of the Environmental Impact Assessment regime. It does not provide a structured and reasoned comparison of feasible alternatives

based on their environmental impacts. Instead, it offers a narrative account of project development, which does not adequately demonstrate that less harmful options have been identified, evaluated, and selected over more damaging alternatives.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has genuinely considered the possibility of situating turbines further offshore, where the associated visual, ecological, and coastal impacts would likely be lessened. Considering the sensitivity of the West Lewis coastline, and the crucial role that proximity to shore plays in assessing impact, the lack of this analysis hinders any conclusion that the proposed location is the least damaging option available.

Furthermore, these inadequacies extend to the evaluation of cable routing and landfall assessment. There is insufficient evidence demonstrating that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy, along with the absence of comparative analysis, implies that mitigation through design has not been implemented, resulting instead in a reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight represents a disregard for the established mitigation hierarchy, which obstructs the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives available. The omission of a robust alternatives assessment precludes the conclusion that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species presents significant shortcomings, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal area. This environment is both highly sensitive and biologically active, yet the data on existing conditions is insufficient, and the methodologies used do not effectively capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment fails to provide a solid evidential basis for assessing impacts.

A notable gap in the analysis pertains to otters, which are classified as a European

Protected Species. The application does not adequately acknowledge or evaluate their active usage of coastal regions for foraging and movement. The oversight of their core foraging range and behavioural patterns means that the potential impacts stemming from construction disturbance, noise, and increased activity remain inadequately assessed. This significant omission casts doubt on any conclusions drawn regarding the absence of noteworthy effects on this species.

There are also considerable flaws in the assessment of basking sharks, as the reliance on aerial surveys introduces a substantial bias in detection, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate these waters are frequented by such species. The failure to incorporate or give proper consideration to this data leads to an incomplete baseline, further undermining the reliability of the conclusions made.

The limitations in methodology result in conclusions of negligible or non-significant effects being based on assumptions rather than rigorous evidence. The lack of adequate baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the true extent of risk to marine species and their habitats.

From a regulatory standpoint, the application does not align with the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not correctly identified or assessed protected species. The degree of uncertainty raised prevents the elimination of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an assessment that is unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine ecology and protected species, culminating in the overall determination that the application lacks a credible evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A striking contradiction arises within the application itself, where the developer claims

that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. Such inconsistencies cast doubt on the reliability of the assessment, suggesting that the conclusions drawn are not supported by adequate evidence. Furthermore, the assessment lacks sufficient proof that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The critical importance of these feeding grounds has not been fully recognised, and the reliance on modelling techniques introduces further uncertainty, particularly concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially when baseline data is incomplete and the behavioural responses of the species are not well understood.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application fails to recognise this connection, approaching cultural heritage and community identity in a fundamentally inadequate manner. Rather than viewing heritage as dynamic and ongoing, it treats it as a collection of isolated and static assets, neglecting their social, cultural, and spiritual significance within the community.

This shortcoming is particularly evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active

places of burial and spiritual practice, yet the assessment mischaracterises them as static features. It does not take into account their continued use, meaning, or the impact that development may have on their setting, leading to an incomplete evaluation of cultural effects and overlooking their role in community life.

Additionally, the assessment omits consideration of intangible cultural heritage, such as the Gaelic language and traditions, as well as the community's enduring relationship with the coastal environment. These aspects are vital to the identity of the area but are entirely absent from the evaluation, creating a significant gap in understanding the cultural impact of the development.

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

Moreover, the absence of a compliant Island Communities Impact Assessment is a critical procedural failure. This assessment is mandated by the Islands (Scotland) Act 2018, and without it, the competent authority cannot legally evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination of the application.

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

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, leaving the true cultural cost of the proposal unaddressed.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full Social Impact Assessment has not been published, leading to a significant gap in evidence. This lack of transparency hinders both the public and the competent authority from fully understanding the social risks identified by the developer's own research. Although summaries reveal that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, the absence of the complete assessment restricts proper scrutiny of these findings.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these impacts have not been adequately addressed in the main application, nor given the appropriate weight

they deserve. This withholding of information obscures the actual human and social cost of the development.

The significance of a thorough understanding of social, economic, and health impacts cannot be overstated, especially for developments of this magnitude that may influence community character and functioning. The lack of comprehensive data compromises the Environmental Impact Assessment process and the ability to properly weigh the benefits against the harms of the proposal.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. The evidence suggests existing adverse effects that remain undisclosed. Without the complete assessment, it cannot be shown that the development will support positive health outcomes and avoid harm.

The implications of this procedural omission 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 failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, alongside evidence of current adverse impacts, leads to an incomplete and unreliable evaluation. This situation obstructs a lawful determination and supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in the assessment of seascape, landscape, and visual impacts, failing to adequately convey the extent of change or the sensitivity of the environment affected. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated in close proximity to the shoreline, would introduce a continuous industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Concerns arise regarding the methodology employed in selecting and presenting visual viewpoints. Evidence suggests that these viewpoints may not accurately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and high-value landscapes. This issue raises the possibility that the magnitude of the visual impact has been understated, casting doubt on the reliability of the assessment.

The application also inadequately addresses the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. Rather than acknowledging this interdependence, the assessment treats these assets as isolated, resulting in a limited

evaluation of the impacts on their setting and cultural importance.

Moreover, the proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This signifies not only a visual impact but a broader cultural and spatial detriment that remains insufficiently addressed in the application.

From a policy standpoint, the proposal conflicts with the National Planning Framework 4, particularly concerning the safeguarding of natural areas and historic assets. The magnitude of change proposed is inconsistent with the obligations to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further erodes any assertions of compliance with relevant policies.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the resulting changes are fundamental and permanent, rendering mitigation efforts unlikely to achieve an acceptable outcome.

Overall, the assessment does not accurately reflect the scale of the impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the assertion that the proposal is inconsistent with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet the assessment of construction and pollution risks lacks the necessary detail to evaluate potential environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on future mitigation and contingency measures that are intended to be established post-consent. This approach raises concerns as it hinders any meaningful assessment of the adequacy or effectiveness of these undefined measures.

Given the sensitivity of the receiving environment, which includes the West Lewis coastline with its clean coastal waters and important habitats vulnerable to sediment disturbance and contamination, this reliance on future planning is particularly troubling. The application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills but fails to provide adequate information 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 resulting from the disturbance of the seabed and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. Furthermore, this

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

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a stage after consent has been granted, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In conclusion, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts result in a materially incomplete assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is insufficient.

FISHERIES AND MARINE LIFE

The application proposes a development that may affect the fisheries and marine life off the West Lewis coast, an area known for its diverse marine ecosystem and active fishing industry. However, the assessment of ecological and socio-economic impacts is insufficient. It does not adequately demonstrate how these important uses and habitats can be protected or maintained without causing significant disruption.

A major concern is the assumption that fishing activities can be relocated without negative consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of accommodating increased pressure. This gap is critical, as the risk of overfishing in other locations could have broader economic implications for the local fishing fleet. Without a thorough, evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Additionally, the proposal poses serious risks to marine species due to underwater noise generated during construction. The use of high-energy hammer piling for an extended period is expected to cause disturbances over large distances, impacting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises major concerns, yet the application underestimates these effects and provides insufficient evidence to support this minimisation.

There is also a notable inconsistency within the application; it acknowledges that

licences are required to permit harm to European Protected Species while simultaneously claiming that impacts are negligible. This contradiction undermines the credibility of the assessment and raises doubts about compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

Moreover, the assessment neglects to consider cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

From a policy standpoint, the application fails to show adherence to National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, which hinders any conclusion regarding the proposal's sustainability.

In summary, the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies result in an incomplete and unreliable assessment. These shortcomings inhibit a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not adequately address the full extent of impacts from what constitutes a single integrated project. The offshore turbines and the associated onshore works are interrelated; however, they are evaluated separately, leading to a fragmented analysis that fails to reflect the true scale of environmental and socio-economic effects.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically delicate habitat. The current application lacks a thorough assessment of these impacts, which prevents a complete understanding of the project's overall environmental footprint.

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

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which are protected by policy. The application does not show that the impacts on these habitats have been thoroughly evaluated or that

appropriate avoidance measures have been put in place, resulting in a notable evidential gap concerning biodiversity protection.

Concerns also arise regarding the project's carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt that contradicts the principles of renewable energy development. The application fails to sufficiently address this concern or to demonstrate that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide evidence that necessary consents or processes have been initiated, thereby raising questions about the project's deliverability and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a critical gap. The West Lewis coastline boasts exceptionally dark skies, which are integral to its environmental quality, cultural identity, and tourism value. The proposed installation of permanent red aviation lighting, visible over long distances, would create a persistent and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Significantly, the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors has not been evaluated. This is particularly concerning given the importance of dark skies to the area's identity and the burgeoning tourism sectors, such as astro-tourism. The failure to consider these factors results in an evident gap in the overall landscape and environmental assessment.

More alarmingly, there has been no evaluation regarding the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased collision risks. The application lacks any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or potentially increase

mortality rates.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which neglects to account for nocturnal activity and related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, a risk that has yet to be assessed. The absence of site-specific night-time data creates a crucial deficit in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The necessary standard of evidence to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus engaging the precautionary principle and obstructing a lawful determination.

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

Collectively, the absence of assessments concerning dark skies and nocturnal wildlife represents a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination.

TOURISM

The application presents a materially deficient assessment of tourism impacts, neglecting to evaluate the economic and social ramifications for a key sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment regarding how large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions.

Tourism on the island has seen substantial growth, with revenues increasing from £65 million in 2017 to over £81.5 million. This sector supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite this significance, the application does not evaluate how the industrialisation of the seascape and a potential decline in environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains uncertain whether the proposed development would yield a net economic benefit or threaten a vital and expanding sector.

Furthermore, the assessment inadequately addresses the critical role of environmental quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies to visitor experience. The importance of emerging markets, such as nature-based

tourism and astro-tourism, is overlooked, and the absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a lack of understanding regarding impacts on a recognised and growing component of the local economy.

The implications extend beyond tourism, affecting employment, local businesses, and community sustainability within an island community that already experiences limited economic diversification. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4, particularly concerning economic impacts and the necessity of showing net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector, and fails to furnish adequate evidence for the competent authority to assess the economic consequences of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development 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.

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: 0E75E998

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in an examination of the Environmental Impact Assessment Report and associated documentation, highlighting material deficiencies across planning, environmental, cultural, and procedural dimensions. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks an adequate evidential basis necessary for lawful determination. It suffers from significant omissions in critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The use of a flexible design framework hinders a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures precludes an evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, making the claims of negligible or non-significant effects unsupported by robust evidence.

Substantive policy conflicts are evident, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly pertinent concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate adherence to national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the proposal's acceptability within policy frameworks.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and lacks a full and reliable account of the potential environmental effects of the proposal. There is significant uncertainty due to the use of a flexible Project Design Envelope that does not commit to specific turbine dimensions, layouts, or configurations. This lack of specificity undermines the assessment's integrity, making it impossible to consistently apply a worst-case scenario. Consequently, the impacts described may not accurately reflect the final development, which hinders both public understanding and the competent authority's ability to grasp the actual environmental effects.

The application places considerable reliance on mitigation measures, management plans, and monitoring strategies that remain undefined. As a result, consent is sought with the expectation that environmental harm will be managed at a later date. This approach prevents a meaningful evaluation of how effective these measures will be and hampers the assessment of any residual impacts. Deferring essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also notable deficiencies in evidence, including gaps in baseline data and limitations in methodology, which lead to reliance on assumptions rather than site-specific evidence. This creates uncertainty about the scale and significance of impacts, especially when negligible or non-significant effects are claimed without robust supporting data. Insufficient information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that does not align with statutory requirements.

As a result, the application does not meet the evidential standards outlined in the Habitats Regulations, which necessitate excluding adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to comply with the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it does not adequately demonstrate that impacts have been fully assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is fundamentally inadequate and does not satisfy the statutory requirements of the Environmental Impact Assessment regime. A structured and reasoned comparison of feasible alternatives based on their environmental effects is lacking. Instead, the application offers a narrative account of the project's evolution, which does not effectively

demonstrate that less harmful options have been identified, assessed, and selected in preference to more damaging solutions.

There is a clear absence of transparent and evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has genuinely considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. The sensitivity of the West Lewis coastline is a critical factor, and the importance of proximity to shore in determining impact cannot be overstated. The lack of such analysis means that no conclusion can be drawn that the proposed siting is the least damaging option available.

These shortcomings are evident in the cable routing and landfall assessment as well, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The absence of a clear avoidance strategy, along with the lack of comparative analysis, signifies that mitigation by design has not been effectively applied, leaving reliance 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 failure to adhere to the established mitigation hierarchy prevents the competent authority from understanding whether more appropriate and less harmful alternatives are available. Without a comprehensive assessment of alternatives, the proposal cannot be deemed a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is materially deficient. There is a lack of complete and reliable understanding of ecological receptors, as the baseline data remains incomplete and the methodologies employed fail to adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not provide a sound evidential basis for evaluating impacts.

A significant shortcoming in this assessment is its failure to properly recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and

increased activity are inadequately evaluated. This oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

The assessment also falls short in addressing basking sharks, where reliance on aerial surveys leads to substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological limitations mean that any conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. The absence of sufficient baseline data hinders meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions, creating uncertainty about the true scale of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided in the application is flawed, presenting significant gaps in evidence and internal contradictions that seriously undermine its conclusions. Key foraging areas and migratory pathways for seabird populations are located on the west coast of the Isle of Lewis, which is home to internationally important species that are already in decline. However, the application fails to adequately demonstrate, to the necessary evidential standard, that these species will not face adverse effects due to the proposed development. Critical issues such as displacement, collision risk, and habitat loss are not thoroughly evaluated within the assessment.

A notable inconsistency arises in the application, as the developer asserts that there will be no significant adverse effects while concurrently putting forth a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction raises concerns about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the available evidence.

Moreover, the assessment does not sufficiently establish that seabirds associated with

protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these vital feeding grounds has not been fully considered, and the dependence on modelling approaches brings added uncertainty, particularly for species experiencing severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The proposed turbine locations are situated within a recognised migratory corridor, which introduces a significant risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to assess the long-term implications of sustained mortality within this corridor, as well as the potential impact on species with relatively small global populations.

From a regulatory viewpoint, 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 deficiencies and limitations in the modelling approach, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

Furthermore, the 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 prove that internationally important seabird populations will not suffer adverse effects places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided in the application is fundamentally flawed, particularly regarding the cultural heritage and community identity associated with the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. Instead of recognising these relationships, the application adopts a reductive perspective, treating heritage as a collection of isolated, static assets. Such an approach fails to acknowledge the ongoing social, cultural, and spiritual roles these elements play within the community.

A significant shortcoming is evident in how the assessment treats culturally important sites, specifically the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mischaracterised as mere static features. This misrepresentation ignores their continued use and significance, as well as the potential impacts of the proposed development on their surroundings. Consequently, the evaluation of cultural effects remains incomplete, overlooking the cemeteries' essential role in community life.

Additionally, the application neglects to consider intangible cultural heritage elements, which include the Gaelic language, local traditions, and the long-standing relationship between the community and the coastal environment. These aspects are vital to the area's identity but have been entirely omitted from the assessment, representing a major oversight. Without addressing these components, a comprehensive understanding of the cultural impact of the development is unattainable.

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

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

From a policy standpoint, these identified deficiencies directly conflict 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 a recognition of living cultural practices, signifies a clear deviation from policy obligations.

In conclusion, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory requirements create a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application fails to provide a sufficient basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is deeply concerning and significantly undermines the evaluation of social impacts, health, and wellbeing associated with this development. Although the developer conducted focus groups with local residents, the full report has not been made available. This gap in evidence hinders both public understanding and the competent authority's ability to grasp the full extent of social risks identified through the developer's own work.

Residents are already reporting measurable stress, anxiety, and concern related to the scale and proximity of the proposal, and these impacts arise from direct engagement rather than speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings thoroughly or to appreciate their significance in the

decision-making process.

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

This situation adversely affects the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly in terms of their effects on community character and functioning. The lack of the complete dataset undermines the application, preventing a thorough assessment of the balance between potential benefits and harms.

From a policy standpoint, the application fails to align with National Planning Framework 4 regarding health and wellbeing, which stipulates that developments should promote positive health outcomes while avoiding harm. The available evidence suggests existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance with this policy without the complete assessment.

Procedurally, the implications are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission represents a serious flaw within the application and indicates a failure to meet the evidential requirements mandated by the Environmental Impact Assessment framework.

Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing negative impacts, results in an incomplete and unreliable assessment. This scenario not only obstructs a lawful determination but also reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application for large-scale turbines along the West Lewis coastline raises significant concerns regarding its impact on the local landscape, seascape, and cultural heritage. The introduction of these turbines would lead to a dominant industrial presence that fundamentally changes the area's character, known for its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. This alteration to the landscape is not only substantial but also permanent and irreversible.

The visual impact of the turbines is inadequately represented in the assessment. Due to their scale and proximity to residential areas, historic sites, and popular coastal locations, the turbines would dominate views and severely impact visual amenity. This change erodes the defining qualities of naturalness and remoteness, yet the

assessment fails to convey the full significance of this impact within such a sensitive landscape.

Methodological shortcomings are evident in the selection and presentation of visual viewpoints. It appears that the chosen viewpoints do not fully encapsulate the sensitivity of key cultural heritage sites and high-value landscapes. Consequently, the potential visual impact may have been understated, leading to a less reliable assessment.

Additionally, the application neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Treating these assets as isolated fails to acknowledge their interdependence, resulting in an inadequate evaluation of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape threatens to sever these vital connections, disrupting the context in which heritage assets are experienced. This change represents not merely a visual impact but a wider cultural and spatial harm that remains insufficiently assessed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which aims to protect natural places and historic assets. The significant scale of change proposed is incompatible with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a robust worst-case impact assessment undermines any assertion of compliance with established policies.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Thus, the changes brought about would be fundamental and permanent, beyond the scope of acceptable reduction through mitigation.

In summary, the assessment provided is inadequate in accurately portraying the scale of impact, the sensitivity of the receiving environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal cannot be reconciled with the protection of this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is materially deficient and does not include the detail needed to understand the likely environmental effects. The proposal entails significant seabed preparation and installation activities in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application depends on mitigation and contingency measures that are to be prepared

after consent, which hinders a meaningful evaluation of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly alarming. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. The application acknowledges the risks associated with sediment mobilisation and accidental chemical or oil spills but fails to furnish adequate details on how these incidents will be prevented, controlled, or monitored.

There is significant uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been recognised as sensitive within the wider assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application prevents the evaluation of whether suitable safeguards are established to address pollution incidents. This creates procedural risks 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 contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and the absence of this information means that a lawful determination cannot be achieved. The application also does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts contribute to a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks and further reinforce 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 raises serious concerns regarding the routing of infrastructure through active croft land, which introduces potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, leading to questions about the deliverability and lawful implementation of the project.

The assessment of onshore infrastructure is significantly incomplete, failing to recognise the interconnectedness of the offshore turbines and onshore works. This separation results in a fragmented approach that obscures the full scale of environmental and socio-economic impacts. The onshore components include cabling

across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. Excavation is planned across areas of deep peat, particularly within Barvas Moor, which is both a significant carbon store and an ecologically sensitive habitat. The lack of a comprehensive assessment hinders a full understanding of the overall environmental footprint of the project.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The West Lewis coastline is renowned for its exceptionally dark skies, which are vital for the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, visible over considerable distances, would create a persistent and disruptive "wall of light" effect across the western horizon, drastically changing 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 lack of consideration is especially troubling given the significance of dark skies to the area's identity and the emerging sectors of tourism, such as astro-tourism. The omission represents a clear gap in the overall assessment of landscape and environmental impacts.

Furthermore, there is no examination of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can result in disorientation and a heightened risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to address how aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data for the ornithological assessment exacerbates this issue, as it does not capture nocturnal activities or the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential hazard remains unassessed. The lack of site-specific night-time data creates a critical deficiency in understanding ecological impacts.

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

From a policy standpoint, the omission contradicts the National Planning Framework 4 concerning the protection of natural environments and overall environmental quality. It also compromises the broader assessment of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

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

TOURISM

The evaluation of tourism impacts presented in the application is severely lacking, failing to address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The region's tourism is intrinsically linked to its natural assets, which include the wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution derived from tourism.

Tourism on the Isle of Lewis has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application neglects to model the potential

effects of seascape industrialisation and environmental degradation on Tourism Gross Value Added, as well as on broader economic resilience. The lack of such analysis makes it impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the assessment disregards the critical role of environmental quality in bolstering tourism, particularly the significance of unspoiled landscapes and dark skies in shaping visitor experiences and catering to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a substantial gap in understanding the impacts on a recognised and expanding component of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate tourism impacts bears wider implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been appropriately considered, contrary to the requirements set forth by the Islands (Scotland) Act 2018.

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

In summary, the inadequacies in quantifying tourism impacts, assessing the environmental drivers influencing visitor behaviour, and recognising the island's economic dependencies culminate in a considerable evidential gap. This hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

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

In addition to the evidential gaps, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the complete Social Impact Assessment is a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

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

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

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

In conclusion, the application is procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks prevents a lawful and evidence-based decision. Therefore, it is essential that the competent authority either refuses consent based on these grounds or utilises the relevant regulatory provisions to mandate the submission of the missing information. A formal request is thus made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

Having spent and still spending many holidays in Barvas it would be devastating to see the skyline ruined for everything and everyone along the shoreline. The infrastructure on the island will be hugely disruptive. The island should be encouraging more tourists to help the economy and share the beauty of the place. It would be a huge shame to make the change.

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: 21A745B6

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 marine licensing and Environmental Impact Assessment requirements. It is founded on a review of the Environmental Impact Assessment Report and related documents, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale and design of the proposal, along with its proximity to the shore, raises serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent, and several key elements of the proposal remain undefined. The flexible design framework obstructs a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unassessed. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust supporting evidence.

Furthermore, there are evident and substantial policy conflicts associated with the proposal. It 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 health and wellbeing. The proposal does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and hinder the competent authority's ability to ascertain the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal raises further concerns, with large turbines positioned near the shoreline, raising issues related to landscape capacity, visual dominance, and environmental impact. In light of the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In this context, it is imperative that the precautionary principle is applied.

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.

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives, which does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their environmental effects, it merely outlines the project's development history. This lack of analysis does not show that less harmful options have been properly identified and

assessed in preference to more damaging solutions.

There is no clear or evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has given serious consideration to placing turbines further offshore, where visual, ecological, and coastal impacts would probably be lessened. The sensitivity of the West Lewis coastline makes proximity to shore crucial in assessing impact. The lack of such analysis means that it cannot be concluded that the proposed siting is the least damaging option.

This inadequacy also applies to cable routing and landfall assessment. There is insufficient evidence that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, along with the lack of comparative analysis, suggests that design-based mitigation has not been implemented, leading instead to reliance on post-design mitigation measures.

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

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

Additional shortcomings are evident in the evaluation of basking sharks, where reliance

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

The methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of sufficient baseline data also hampers the assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty around the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, engaging the precautionary principle. In light of this, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application is fundamentally flawed, particularly in its ornithological assessment, which contains significant gaps and internal 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 does not sufficiently demonstrate that these species will not be adversely affected. The proposed development is situated within key foraging areas and migratory pathways, yet the assessment fails to adequately evaluate the implications of displacement, collision risk, or habitat loss.

There is a notable contradiction within the application itself, as the developer concludes that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions are not backed by the available evidence. The assessment lacks adequate evidence to ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully considered, and the reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given that baseline data is incomplete and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses an additional and substantial risk, effectively acting as a barrier in a key flight path for species travelling between the United Kingdom and Iceland. The application does not provide a thorough assessment of the long-term consequences of sustained mortality in this corridor, nor does it evaluate the potential effects on species with small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary 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 invokes the precautionary principle and prevents a lawful conclusion in support of consent. Furthermore, the identified deficiencies represent a failure to adhere to National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts 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 shortcomings hinder a thorough evaluation of the impacts and support the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity along the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are interconnected. Instead of recognising these relationships, the application takes a reductive approach, viewing heritage as isolated and static rather than dynamic and socially significant.

The treatment of important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, highlights a significant deficiency. These cemeteries serve as active places of burial and spiritual practice, yet the assessment treats them as fixed features. It overlooks their ongoing use and the development's impact on their surroundings, leading to an incomplete evaluation of cultural effects and neglecting their importance in community life.

Additionally, the assessment does not consider intangible cultural heritage, such as the Gaelic language and the traditions that reflect the community's long-standing relationship with the coastal environment. These aspects are essential to the area's identity, yet they are notably absent from the evaluation, indicating a critical omission that hinders a proper understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its distinct cultural identity that aligns with Indigenous characteristics, has not been included in a Free, Prior and Informed Consent process. This lack of

meaningful engagement undermines the assessment's credibility and disregards established participation principles in decisions affecting cultural and environmental interests.

Moreover, a vital procedural failure is the absence of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot adequately evaluate the social, cultural, and economic impacts on the island community. This omission alone renders the determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear violation of policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and compliance with statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application lacks a solid foundation for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency surrounding the social impacts, health, and wellbeing related to this proposal is critically lacking, which significantly undermines the evaluation process. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This absence of information creates a substantial evidential gap, inhibiting both public understanding and the ability of the competent authority to assess the social risks highlighted by the developer's own research.

Residents have reported experiencing stress, anxiety, and concern directly associated with the scale and proximity of the proposed development. These impacts stem from direct engagement and are firmly rooted in evidence, not conjecture. However, without access to the complete assessment, the findings cannot undergo adequate scrutiny, limiting the capacity to evaluate their significance during the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with indications of "cultural loss" emerging from the developer's own findings. These impacts have not been thoroughly incorporated into the main application or afforded appropriate consideration. The failure to disclose the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also compromises the integrity of the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly when they could affect community character and functioning. The absence of the complete data set

results in a failure to provide a thorough evidential basis necessary for weighing the benefits against the harms.

From a policy standpoint, the application falls short in demonstrating adherence to National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm, yet existing evidence suggests adverse effects that have not been adequately disclosed. Consequently, it is impossible to show compliance with this policy without the full assessment.

The procedural ramifications are profound. The competent authority is unable to carry out a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission within the application and a failure to meet the evidential standards mandated by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, along with documented evidence of existing adverse impacts, renders the assessment incomplete and untrustworthy. This inadequacy obstructs a lawful determination and underscores the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not properly represent the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would establish a continuous industrial presence, significantly altering this character and leading to a permanent and irreversible change in the landscape.

There is also a lack of clarity in the application regarding the magnitude of the visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the extent of this impact or its importance within such a sensitive landscape.

Methodological issues arise from the selection and presentation of visual viewpoints. It appears that the viewpoints may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This may lead to an understatement of the visual impact, which questions the reliability of the assessment.

Moreover, the assessment does not consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting, linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities,

the assessment overlooks their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and their connection to the natural horizon. This change is not merely a visual impact; it represents a broader cultural and spatial harm that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which seeks to protect natural areas and historic assets. The proposed scale of change is at odds with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes the argument for policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resulting changes are fundamental and permanent, rather than something that can be lessened to an acceptable degree through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works in a high-energy Atlantic environment, yet the assessment of construction and pollution risks is incomplete. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on mitigation and contingency measures that would be prepared after consent, which prevents any meaningful evaluation of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly concerning. The West Lewis coastline supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on prevention, control, or monitoring measures.

Uncertainty regarding the scale and behaviour of sediment plumes from seabed disturbance and cable installation further complicates the situation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty also extends to the potential effects on marine species and habitats identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures exacerbates these issues. By deferring contingency planning to a post-consent stage, the application prevents an evaluation of whether appropriate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed before consent, and the lack of such information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts make the assessment materially deficient. These shortcomings hinder a robust evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries related to this application lacks robustness and fails to address significant ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these vital habitats and uses can be preserved without considerable disruption.

A critical concern is the presumption that fishing activity can be moved without repercussions. The application does not provide any evidence that alternative fishing grounds are available, accessible, or capable of handling increased activity. This lack of information is crucial, as displacing fishing could lead to overfishing in other areas and may have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and local livelihoods cannot be accurately assessed.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to disturb a wide area, adversely affecting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises significant concerns, yet the application appears to minimise the importance of these effects without adequate supporting evidence.

There is a noticeable inconsistency in the application, as it acknowledges the necessity for licences to allow harm to European Protected Species while simultaneously stating that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding adherence to the Habitats

Regulations, especially in light of anticipated harm that may require legal approval.

Moreover, the assessment neglects to address the cumulative impacts stemming from multiple pressures, such as habitat disruption, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

In conclusion, the separation of project components, the lack of a comprehensive assessment, and the absence of substantial evidence concerning environmental and land use impacts culminate in an incomplete and unreliable submission, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to include an assessment of dark skies and nocturnal wildlife, which represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the environmental quality, cultural identity, and tourism appeal of the area. The introduction of permanent red aviation lighting that can be seen from great distances would create a persistent and intrusive “wall of light” effect on the western horizon, fundamentally changing the night-time landscape.

This application does not evaluate how the lighting will affect visual amenity, landscape character, or the experiences of both residents and visitors. The absence of this analysis is particularly concerning given the value of dark skies to the local identity and the growing interest in tourism sectors like astro-tourism. The neglect to consider these factors results in a clear shortfall in the environmental and landscape assessment.

Moreover, there is no examination of the impact on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly affected by artificial lighting due to their phototactic responses, which can result in disorientation and heightened risks of collision. The application does not provide any lighting impact assessment or phototaxis study, neglecting to evaluate the potential consequences of aviation lighting on these species or the risk of increased mortality.

The reliance on daytime survey data in the ornithological assessment exacerbates this issue, as it does not account for nocturnal behaviours or associated hazards. Other species, like Kittiwakes, which may engage in foraging or migration at night, are also susceptible to disorientation from artificial lighting, but this risk remains unassessed. The lack of site-specific night-time data creates a substantial gap in understanding ecological impacts.

Without a thorough evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites could be negatively affected. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and impeding lawful determination.

From a policy standpoint, this omission is at odds with the National Planning Framework 4, which pertains to the safeguarding of natural areas and environmental quality. It also undermines the overall analysis of landscape and seascape impacts, as the character of night-time environments is a vital component of the ecological setting.

In summary, the failure to assess dark skies and nocturnal wildlife leads to a significant evidential void. The lack of baseline data, impact modelling, and detailed species-specific analysis renders the application incomplete and unfit for lawful determination.

TOURISM

The assessment related to tourism impacts is notably lacking and does not adequately address the economic and social implications for a critical sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the application fails to provide any quantified evaluation of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has experienced substantial growth, rising from £65 million in 2017 to more than £81.5 million, while supporting over 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not explore how the industrialisation of the seascape and the resultant loss of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. This lack of analysis leaves it unclear whether the proposed development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Moreover, the assessment neglects to consider the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging niches such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the potential effects on an increasingly recognised segment of the local economy.

Given that the island community has limited economic diversification, the disregard for tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a comprehensive Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National

Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It stands in conflict with strategic goals that prioritise tourism as a vital growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental influences on visitor behaviour, and acknowledging the island's economic dependency culminate in a substantial evidential void. This significantly hampers a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

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

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

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

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to

exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

I believe the project is fundamentally flawed. The turbines themselves at 338 metres high will be amongst the largest if not the largest any where in the world.

The distance from our coastline is 6km to 13 km. This is far closer than any other wind farm development of this size. The planned Talisk development further north is 35 km from the coast of the island will have fewer wind turbines with a maximum height of 280 metres.

The Berwick Bank development is 38km from the nearest coastline.

I could go on and include planned projects elsewhere in Europe, America and Asia.

In short all planned or existing projects of this scope and size throughout the world are built much further out to minimize the social and environmental effects on coastal communities.

Why should Lewis be the exception?

I am no NIMBY or climate change denier i just believe that the turbines should be constructed the appropriate distance from our coastline

I also believe that if this project goes through as planned the resulting economic and environmental issues may will create a back lash deterring future off shore wind development

The current plan is to achieve maximum profits with minimum expenditure.

Please consider stopping or altering the planned development.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 455B8868

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 regimes. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and accompanying documents, revealing significant planning, environmental, cultural, and procedural deficiencies. The project is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The design, scale, and proximity of the project raise serious concerns about its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There are notable gaps in critical environmental data, with baseline information being both limited and inconsistent. Several key elements of the proposal are not well-defined. Furthermore, the adoption of a flexible design framework complicates the assessment of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence to substantiate them.

There are also evident and substantial conflicts with policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory criteria necessary for consent and hinder the competent authority's capacity to conclude that the development can be accepted under policy considerations.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency to accurately reflect the potential environmental consequences of the proposal. A flexible Project Design Envelope has been employed, which does not commit to definitive turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty and obstructs the effective application of a worst-case scenario analysis. As a result, the integrity of the assessment is compromised, leading to a situation where the impacts detailed may not correspond to the actual development, thus hindering both public comprehension and the understanding of the competent authority regarding the real environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain unspecified. As consent is sought with the expectation that environmental harm will be addressed later, this creates an impediment to a genuine evaluation of the effectiveness of such measures and the assessment of residual impacts. This postponement of crucial information to post-consent phases is not procedurally acceptable and contradicts the aims of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation must be clearly outlined before a decision is made.

Moreover, there are considerable evidential shortcomings, including inadequacies in baseline data, methodological limitations, and a reliance on assumptions in lieu of site-specific evidence. These issues lead to uncertainty about the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without solid supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot align with statutory requirements.

Consequently, the application does not meet the evidential standards mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises concerns related to the precautionary principle, especially in the context of protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it fails to prove that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and robust evaluation of environmental effects, leaving the competent authority ill-equipped to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The ecological assessment provided lacks the necessary completeness and reliability to understand the ecological receptors in the West Lewis coastal environment. This region is a biologically active marine system, yet the methodologies used have not

sufficiently captured the presence, behaviour, and habitat use of marine species. Consequently, the assessment fails to deliver an evidential basis for evaluating potential impacts.

Significant shortcomings are evident in the treatment of otters, a European Protected Species. The assessment does not adequately acknowledge their use of coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the potential impacts from construction activities, noise, and increased human presence are not thoroughly evaluated. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Similar deficiencies are noted in the assessment of basking sharks. The reliance on aerial surveys leads to a substantial detection bias, particularly given the conditions in the Atlantic. This methodology likely underrepresents their presence, especially when contrasted with land-based observations that indicate these waters are used frequently by the species. The failure to integrate or appropriately consider such information contributes to an incomplete baseline and diminishes the credibility of the findings.

These methodological weaknesses result in conclusions about negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not conform to the requirements established under the Environmental Impact Assessment regime and the National Planning Framework 4, as the necessary identification and assessment of protected species have not been conducted appropriately. The uncertainty generated prohibits the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species and highlight the overall lack of a sufficient evidential foundation for the application.

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely deficient, neglecting the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic perspective, reducing heritage to a collection of isolated, unchanging features instead of recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites,

including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet the assessment inaccurately describes them as static entities, overlooking their ongoing significance, usage, and the development's effects on their surroundings. This misunderstanding results in an incomplete cultural evaluation and fails to account for their importance to community life.

Moreover, the assessment disregards intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These critical aspects of identity are entirely omitted, representing a substantial gap in the evaluation. Without acknowledging these factors, the true cultural impact of the proposed development cannot be fully grasped.

Concerns regarding community rights and engagement also arise. The Gaelic-speaking population embodies a unique cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement significantly undermines the assessment's credibility and fails to adhere to established participatory principles in cultural and environmental decision-making.

Additionally, there is a notable procedural oversight in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority is unable to meet its legal obligation to assess the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and locations. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, clearly violates policy expectations.

In summary, the neglect to adequately evaluate living heritage, intangible cultural significance, community rights, and statutory duties results in a substantial evidential void. The cultural ramifications of the development have not been properly examined, and the application fails to provide a solid foundation for assessing the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This lack of transparency results in a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified through the developer's own research. Available summaries highlight that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct engagement, indicating that they are based on lived experiences rather than speculation. Yet, without access to the complete assessment, proper scrutiny of these findings is not possible, limiting the

ability to gauge their significance in the decision-making process.

There is also documented evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with findings of "cultural loss" emerging from the developer's own research. Nonetheless, these concerns have not been adequately integrated into the main application or given appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, which further undermines the Environmental Impact Assessment process.

A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when the character and functioning of the community may be at risk. The application does not provide the full dataset needed to accurately assess the balance between benefits and harm, failing to meet the evidential standards required.

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

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

In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse effects, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination, reinforcing the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual impacts, seascape, and landscape is insufficient and does not properly account for the significant changes or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed large-scale turbines situated near the shoreline would introduce a pervasive industrial presence, drastically changing this character and leading to an irreversible transformation of the landscape.

The application fails to accurately depict the extent of this visual alteration. Due to the scale and proximity of the turbines, they would dominate sightlines from residential areas, historic landmarks, and popular coastal spots. This would have a direct effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The evaluation does not adequately express the significance of this impact within the

context of such a delicate landscape.

Moreover, there are concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most adverse scenarios, especially concerning important cultural heritage sites and landscapes of high value. This raises the possibility that the severity of visual impact has been understated, which compromises the reliability of the assessment.

An additional shortcoming is the neglect to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape context, linked through visual and spatial connections to the Atlantic horizon. The assessment treats these as separate entities rather than acknowledging their interrelation, leading to a partial understanding of the impacts on their cultural significance and setting.

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

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the protection of natural areas and historical assets. The magnitude of change is incompatible with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the environmental assessment related to construction and pollution risks, which is markedly incomplete and lacks essential details for evaluating potential environmental impacts. There is a plan for substantial seabed preparation and installation works in a challenging Atlantic environment, yet the necessary Construction Environmental Management Plans and

Pollution Prevention Plans are not fully developed. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent, hindering any meaningful evaluation of their effectiveness or adequacy.

This reliance on unspecified future measures is alarming, particularly considering the sensitive nature of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty about the scale and behaviour of sediment plumes resulting from 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 extends to the potential effects on marine species and habitats that have been identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to assess whether there are sufficient safeguards to address pollution events. This introduces procedural risks and weakens the capacity of the competent authority to evaluate the environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is crucial for likely significant effects and mitigation to be assessed prior to consent, and in the absence of this information, a lawful determination cannot occur. Furthermore, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the lack of specified mitigation measures, inadequate management plans, and the uncertainty surrounding potential impacts lead to a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of the proposal is flawed and does not adequately assess the impacts on marine life and fisheries. The waters off the West Lewis coast are home to a diverse ecosystem and a thriving fishing industry. However, the application does not convincingly show that these important habitats and activities can be preserved without significant harm.

One major concern is the assumption that fishing can be easily displaced without negative consequences. The application does not provide any evidence that alternative

fishing grounds are available or can support the increased pressure that displacement would cause. This is a critical oversight, as it risks overfishing in other areas and could have broader economic implications for local fishermen. Without a detailed and evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

Additionally, the proposal poses considerable risks to marine species, particularly due to noise created during construction. The use of high-energy hammer piling for an extended duration is likely to disrupt marine life across extensive areas, particularly affecting dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is a serious concern, yet the application minimizes these impacts without adequate justification.

There is also a contradiction within the application regarding the need for licenses for harming European Protected Species, while simultaneously claiming that the impacts are negligible. This inconsistency undermines the trustworthiness of the assessment and raises questions about adherence to the Habitats Regulations, especially since harm appears to be expected to a level that requires legal approval.

Moreover, the assessment does not address the cumulative impacts from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, the overall impact on marine ecosystems and economic conditions remains uncertain.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 and the National Marine Plan. It does not prove that the development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity. This lack of compliance hampers any assertion that the proposal supports sustainable development.

In summary, the shortcomings in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions all contribute to an incomplete and unreliable assessment. These issues inhibit a thorough understanding of the potential effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal for the project fails to adequately assess onshore infrastructure, leaving a significant gap in understanding the potential impacts of what should be evaluated as a unified project. The interrelationship between the offshore turbines and the onshore works is critical, yet the assessment treats them separately, leading to a disjointed approach that masks the true extent of environmental and socio-economic repercussions.

Specific onshore activities encompass the cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the establishment of access routes through sensitive landscapes. These actions involve excavating deep

peat areas, especially within Barvas Moor, a vital carbon store and ecologically delicate environment. The lack of a thorough assessment regarding these impacts restricts a full comprehension of the environmental footprint associated with the project.

By not addressing the onshore impacts directly, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be evaluated collectively; however, the division between offshore and onshore elements obscures the combined effects on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats such as machair systems and peatland areas, which are protected under various policies. The application does not convincingly show that it has fully assessed the impacts on these habitats or that it has implemented suitable avoidance measures, resulting in a considerable evidential gap in biodiversity protection.

Moreover, concerns surrounding carbon balance arise from the disturbance of peatland, which releases stored carbon, potentially incurring a carbon debt that runs counter to the aims of renewable energy initiatives. The application falls short in addressing this critical issue or in showing that the carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is insufficient evidence demonstrating that the necessary consents or processes have been initiated, casting doubt on the project's deliverability and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the crucial aspects of dark skies and nocturnal wildlife, marking a significant omission. The West Lewis coastline boasts exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly for developing sectors like astro-tourism. However, the proposal includes permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect on the western horizon, fundamentally changing the night-time environment.

Furthermore, the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors has not been evaluated. This oversight is especially troubling given the importance of dark skies to the area's identity. The lack of consideration for these impacts results in a clear deficiency in the overall environmental and landscape assessment.

Equally concerning is the complete absence of an evaluation of the effects on nocturnal wildlife. Sensitive species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are at risk from artificial lighting due to phototaxis, which can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting might affect these species or contribute to mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or its associated risks. Kittiwakes, for instance, may forage or migrate at night and are similarly vulnerable to disorientation caused by artificial lighting, yet this risk remains unexamined. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and obstructing a lawful determination.

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

In summary, the failure to assess dark skies and nocturnal wildlife creates a substantial evidential gap. Without baseline data, impact modelling, and species-specific analysis, the application remains incomplete and fails to support a lawful determination.

TOURISM

The proposal lacks a thorough assessment of tourism impacts, failing to consider the significant economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism, which has escalated from £65 million in 2017 to over £81.5 million, is crucial, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. The application recognises that 86% of visitors are attracted by the region's scenery; however, it does not provide a quantified analysis of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or the overall economic contribution.

There is a notable oversight in evaluating how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added and the resilience of the economy. Without such an analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an established and expanding sector. Additionally, the assessment neglects to examine the crucial role that environmental quality plays in tourism, specifically the value of unspoiled landscapes and dark skies to the visitor experience, as well as emerging markets like nature-based tourism and astro-tourism.

The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant void in understanding the implications for an increasingly important segment of the local economy. In a community with limited economic diversification, this oversight regarding tourism impacts bears wider consequences for employment, local enterprises, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to establish adherence to National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that designate tourism as a key growth sector and does not supply adequate evidence for the competent authority to evaluate the economic implications of the proposal.

Overall, the failure to quantify tourism impacts, consider environmental influences on visitor behaviour, and acknowledge the island's economic dependence leads to a significant evidential gap. This hinders a thorough assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm presents a significant inadequacy in meeting the criteria for sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable extent of industrialisation was highlighted. This current proposal, however, is put forward within a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Moreover, the application lacks a comprehensive and reliable evidential basis essential for determination. There are substantial gaps in baseline data, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Additionally, critical impact pathways concerning nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects have been neglected. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to include a compliant Island Communities Impact Assessment is a breach of duty under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment represents a significant omission. These issues obstruct the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

In terms of alignment with National Planning Framework 4, the proposal is at odds with its requirements. It does not demonstrate adequate protection of biodiversity, natural areas, and cultural heritage. Furthermore, it has not substantiated that health and wellbeing impacts are acceptable, nor has it provided evidence of net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has been insufficient, obscuring crucial effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain ambiguous and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

Additionally, the proposal threatens to induce substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism represent permanent impacts that cannot be sufficiently mitigated.

In light of these factors, the application is both procedurally and substantively unfit for determination. The breadth of informational deficiencies, coupled with conflicts in policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority refuse consent on these grounds or invoke the appropriate regulatory measures to obtain the requisite missing information.

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

Additional Comments

I will see these ugly structures each and every day when I look out my window not a pleasant sight. Presently I see beautiful skies and the Atlantic Ocean whether it be a beautiful day or in the middle of winter it is an amazing outlook which lots of people would be envious off. I don't want this to change.

This is going to impact tourism, marine life, nature and people's well being to name but a few areas. c

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: 05A45F9A

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regulations. It arises from an evaluation of the Environmental Impact Assessment Report and the associated documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. Concerns about the scale, proximity, and design of the project question its alignment with statutory requirements, national policies, and the tenets of sustainable development.

The application lacks an adequate evidential basis necessary for lawful determination. There are notable gaps in critical environmental data, with baseline information appearing limited and inconsistent, while key elements of the proposal remain unspecified. The adoption of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the available documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, rendering unsupported the claims of negligible or non-significant effects.

Additionally, there are substantial conflicts with established policies. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate that national obligations to protect biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies challenge the statutory tests for consent and impede the competent authority's ability to determine the project's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines situated near the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and not capable of supporting a lawful determination. In light of these factors, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to provide a reliable understanding of the environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which avoids committing to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty compromises the integrity of the assessment, rendering the presented impacts potentially unreflective of the actual development that may be constructed. As a result, both the public and the competent authority are left without a clear understanding of the true extent of environmental effects.

Moreover, the application heavily relies on unestablished mitigation measures, monitoring strategies, and management plans, which are yet to be defined. Seeking consent on the basis that environmental harm will be mitigated at a later stage hinders any meaningful evaluation of these measures' effectiveness or the assessment of residual impacts. This postponement of critical information to stages following consent is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and their mitigations must be clearly established before any determination.

Evidential deficiencies further complicate the assessment, including notable gaps in baseline data and methodological limitations. The reliance on assumptions instead of site-specific evidence raises uncertainty regarding the scale and significance of impacts, especially when negligible or non-significant effects are concluded without adequate supporting data. This lack of sufficient information obstructs a comprehensive understanding of cumulative and worst-case impacts, thus introducing scientific uncertainties that cannot satisfy statutory obligations.

Consequently, the application does not fulfil the evidential standard set by the Habitats Regulations necessary to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot be conclusively shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation strategies, and significant gaps in baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These deficiencies hinder a lawful and robust assessment of the environmental effects, leaving the competent authority unable to make an informed determination based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which does not align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives

based on their environmental impacts, it presents a narrative of project evolution that does not effectively demonstrate that less harmful options have been properly identified and assessed in favour of solutions that may be more damaging.

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

The inadequacies are further seen in the cable routing and landfall assessment, where there is little evidence that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been utilised, relying instead on post-design measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This region, known for its sensitivity and biological activity, is not well represented in the baseline data gathered. The methodologies employed do not effectively capture the presence, behaviour, and habitat usage of key species, which compromises the validity of the impact evaluations.

One glaring oversight is the treatment of otters, a species protected under European law. The application neglects to properly identify and assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural habits means that the potential impacts of construction disturbance,

noise, and increased activity remain inadequately evaluated. This omission significantly undermines claims regarding the absence of significant effects on otters.

Moreover, the assessment of basking sharks suffers from methodological flaws, particularly due to the reliance on aerial surveys that are prone to significant detection bias, especially under Atlantic conditions. This methodology likely results in an underrepresentation of their presence, in stark contrast to established land-based observations which indicate frequent usage of these waters. The disregard for or improper consideration of this crucial data further contributes to an incomplete baseline, compromising the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions about negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of adequate baseline data obstructs any meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. Consequently, this introduces uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements or the National Planning Framework 4, as it fails to accurately identify or assess protected species. The degree of uncertainty that arises prevents the possibility of ruling out adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, it is clear that consent cannot be legally granted.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These critical deficiencies hinder a robust evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration is fundamentally flawed due to significant gaps in evidence and internal inconsistencies within the ornithological assessment, which severely undermine its conclusions. It is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, where internationally important seabird populations, many of which are already in decline, are present. However, the application fails to provide the necessary evidence to demonstrate that these species will not be adversely affected.

There exists a critical contradiction in the application, as the developer asserts there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available. The assessment lacks sufficient evidence to confirm that seabirds

associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore, the importance of these feeding grounds is inadequately addressed, and the reliance on modelling techniques introduces uncertainty, especially for species experiencing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses are not thoroughly understood.

The siting of turbines within a recognised migratory corridor adds another significant risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of continued mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to conclude that there is no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been reached. This activates the precautionary principle and hinders a lawful conclusion in favour of consent.

Additionally, 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 directly conflicts with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, preventing a thorough evaluation of impacts and leading 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 cultural heritage and community identity of the West Lewis coastline, which is a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. It adopts a reductive view of heritage, treating it as a collection of isolated and static assets rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places for spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight neglects their continued use, meaning, and the impact that development may have on their settings. As a result, the cultural effects are incompletely evaluated, disregarding their integral role in community life.

Moreover, the assessment neglects intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the

coastal environment. These aspects are fundamental to the area's identity yet are entirely omitted from the evaluation, representing a significant oversight. The cultural impact of the development remains poorly understood without the consideration of these vital factors.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity with characteristics that align with those of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent conducted. This lack of meaningful engagement weakens the credibility of the assessment and fails to adhere to established principles of participation concerning cultural and environmental matters.

Additionally, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This alone renders the determination unlawful.

From a policy standpoint, these issues place the proposal in direct conflict with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The oversight of both tangible and intangible heritage, alongside the failure to recognise living cultural practices, signifies a clear violation of policy requirements.

In summary, the failure to assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been sufficiently evaluated, and the application lacks a robust foundation for understanding the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal under consideration has significant shortcomings regarding the assessment of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the complete report has not been made available. This lack of transparency creates a substantial evidential gap, obstructing both public understanding and the competent authority's ability to assess the full range of social risks identified in the developer's own research.

Residents have already reported measurable stress, anxiety, and concern related to the scale and proximity of the proposal. These effects are based on direct engagement rather than speculation. Nevertheless, the absence of the full assessment limits the scrutiny of these findings and hampers the ability to evaluate their relevance in the decision-making process.

Additionally, there are indications that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings.

Despite this recognition, these social impacts have not been adequately incorporated into the main application nor given the appropriate weight they deserve. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning could be affected. The application's failure to provide a complete dataset hampers the ability to weigh benefits against potential harm effectively.

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

The procedural implications of this situation are substantial. The competent authority cannot perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment, which constitutes a material omission in the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment framework.

In conclusion, the non-disclosure of the complete Social Impact Assessment, in conjunction with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual impacts, seascape, and landscape is insufficient and does not properly account for the significant changes or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed large-scale turbines situated near the shoreline would introduce a pervasive industrial presence, drastically changing this character and leading to an irreversible transformation of the landscape.

The application fails to accurately depict the extent of this visual alteration. Due to the scale and proximity of the turbines, they would dominate sightlines from residential areas, historic landmarks, and popular coastal spots. This would have a direct effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The evaluation does not adequately express the significance of this impact within the context of such a delicate landscape.

Moreover, there are concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most adverse scenarios, especially

concerning important cultural heritage sites and landscapes of high value. This raises the possibility that the severity of visual impact has been understated, which compromises the reliability of the assessment.

An additional shortcoming is the neglect to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape context, linked through visual and spatial connections to the Atlantic horizon. The assessment treats these as separate entities rather than acknowledging their interrelation, leading to a partial understanding of the impacts on their cultural significance and setting.

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

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the protection of natural areas and historical assets. The magnitude of change is incompatible with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

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

In summary, the assessment does not accurately portray the extent of impact, the environment's sensitivity, or the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation 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 waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the assessment of fisheries and marine life associated with the application is insufficient and does not provide a robust evaluation of ecological or socio-economic impacts. A critical concern is the flawed assumption that fishing activity can be displaced without consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of supporting the additional pressure that displacement would create. This oversight is significant as it risks overfishing in other areas and could lead to broader economic repercussions for the local fleet. The lack of a clear and evidence-based assessment means that the impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal introduces considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to disturb a wide range of marine life, including species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the

application minimizes the significance of these effects without providing sufficient supporting evidence.

Inconsistencies within the application are also notable. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation. Furthermore, the assessment does not take into account cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and fishing displacement. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be properly determined.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which prevents any conclusion that the proposal reflects sustainable development. In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies collectively render the assessment incomplete and unreliable. These deficiencies hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project fails to adequately evaluate the onshore infrastructure, resulting in an incomplete understanding of the overall impacts of what is essentially a single integrated project. The separate assessments of the offshore turbines and onshore works lead to a fragmented approach that obscures the actual scale of the environmental and socio-economic consequences.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. These activities involve excavation in deep peat areas, notably within Barvas Moor, which is a crucial carbon store and an ecologically sensitive environment. Without a comprehensive assessment of these impacts, the application falls short of providing a clear picture of the project's environmental footprint.

By failing to assess the onshore impacts fully or deferring such evaluations, the application hinders an accurate assessment of cumulative effects. It is essential for the Environmental Impact Assessment process to consider all components of a project in conjunction; however, the distinct treatment of offshore and onshore elements leaves the combined impacts on peatlands, habitats, and communities inadequately understood.

There are also considerable risks to sensitive habitats, such as machair systems and

peatland environments, which are under policy protection. The lack of demonstrated assessment of impacts on these habitats, along with the absence of appropriate avoidance measures, creates a significant evidential gap concerning biodiversity protection.

The proposal raises serious concerns about carbon balance, as disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently address this matter or prove that the overall carbon balance remains positive.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, leading to uncertainties about the deliverability and lawful implementation of the project.

From a policy standpoint, the lack of comprehensive assessment of the project as a whole, along with the failure to demonstrate 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.

Overall, the separation of project components, the absence of thorough assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and untrustworthy, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application 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 alters the night-time environment, yet the assessment of dark skies and nocturnal wildlife is entirely absent from the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to environmental quality, cultural identity, and tourism value. The failure to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors is a substantial omission, particularly given the importance of dark skies to the area’s identity and its emerging tourism sectors, such as astro-tourism.

Moreover, the application neglects to assess how the proposed lighting may affect nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The absence of a lighting impact assessment or phototaxis study means that there is no evaluation of how aviation lighting might influence these species or lead to increased mortality. This gap is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial

lighting, yet this risk has not been addressed. The lack of site-specific night-time data creates a critical deficiency in understanding the ecological impacts of the proposed development.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination. From a policy standpoint, these omissions are inconsistent with National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, this failure undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecological context.

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

TOURISM

The evaluation of tourism impacts within the application is severely lacking and neglects to address the economic and social effects on a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's stunning coastline, almost untouched landscape, dark skies, and the unique sense of remoteness it offers. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a measured assessment of how the introduction of large-scale offshore infrastructure could influence visitor numbers, behaviours, or their overall economic contribution to the region.

The growth of tourism has been remarkable, increasing from £65 million in 2017 to more than £81.5 million, which supports over 1,000 jobs and accounts for as much as 16% of the island's economy. Nonetheless, the application does not explore how the potential industrialisation of the seascape and the deterioration of environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this crucial analysis, it remains unclear whether the proposed development would provide a net economic benefit or damage a vital and flourishing sector.

Moreover, the assessment overlooks the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for enhancing visitor experiences and tapping into emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the potential impacts on a sector that is increasingly important to the local economy.

For an island community with limited economic diversification, the inadequate

consideration of tourism impacts carries broader implications for employment, local enterprises, and the sustainability of the community. The absence of a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been addressed, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to show a net benefit. It conflicts with strategic objectives that designate tourism as a key growth area and fails to provide enough evidence for the competent authority to evaluate the economic repercussions of the proposal.

Ultimately, the shortcomings in quantifying tourism impacts, assessing the environmental factors that influence visitor behaviour, and acknowledging the economic dependence of the island culminate in a significant evidential gap. This deficiency hampers a thorough assessment of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies that undermine its compliance with the principles of sustainable development as dictated by statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. This new application is submitted under a more robust policy framework, which prioritises biodiversity, peatland preservation, landscape integrity, and community wellbeing, yet it fails to meet these vital requirements.

The evidential basis for the application is markedly incomplete and unreliable. Notably, there are substantial gaps in baseline data, the proposal relies on an undefined design envelope, and the mitigation measures suggested remain unspecified. Furthermore, important impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have not been addressed. As a result, the Environmental Impact Assessment does not provide a comprehensive understanding of the potential significant effects or residual impacts.

In addition to the shortcomings in evidence, there are also notable procedural flaws. The lack of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment signifies a material omission. Such deficiencies hinder the competent authority's ability to properly evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application inadequate for determination.

The proposal is fundamentally at odds with the National Planning Framework 4. It does not establish adequate protection for biodiversity, natural environments, and cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks

evidence of a net economic benefit, particularly due to the absence of modelling regarding tourism impacts. Additionally, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential consequences for peatlands, carbon balance, habitats, and crofting land.

There are unresolved environmental risks that remain uncertain and potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent with each other. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

Collectively, these issues render the application both procedurally and substantively unfit for determination. The vast scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is incumbent upon the competent authority to refuse consent based on these grounds or to invoke the relevant regulatory provisions to demand the submission of the necessary missing information.

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

Additional Comments

The development of N4 must not happen. It will destroy local communities, our land and seascapes, our culture. The location is far too close to shore. How could such an awful plan have reached this stage?

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: 996C6E3D

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 relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies across planning, environmental, cultural, and procedural dimensions. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's compatibility with statutory requirements, national policy, and sustainable development principles, primarily due to its scale, proximity to the shoreline, and design.

The application lacks a solid evidential basis for lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain undefined. Furthermore, the employment of a flexible design framework hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures renders any evaluation of their effectiveness impossible. Consequently, the submitted documentation does not facilitate a comprehensive understanding of the impacts on the environment, culture, or community, and assertions of negligible or non-significant effects lack robust evidential support.

There exist clear and substantive conflicts with existing policies. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly with regard to biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are directly relevant to the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal's acceptability from a policy standpoint.

The unprecedented scale of the project in this location raises significant concerns, with large turbines positioned in close proximity to the shoreline, leading to apprehensions regarding landscape capacity, visual dominance, and environmental consequences. Collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential inadequacies, and clear policy non-compliance illustrate that the application is incomplete and unsuitable for lawful determination. In light of these circumstances, the precautionary principle should be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species exhibits significant deficiencies, failing to deliver a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is biologically active and highly sensitive, yet the baseline data remains incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat utilisation of key species, undermining the evidential basis for evaluating impacts.

One notable oversight pertains to otters, classified as a European Protected Species. The application does not adequately recognise or assess their use of coastal areas for foraging and movement. The absence of an evaluation of their core foraging range and behavioural patterns results in a failure to adequately consider the potential effects of construction disturbance, noise, and increased activity, thereby undermining conclusions regarding the absence of significant effects on this species.

Further weaknesses appear in the assessment of basking sharks, with a reliance on aerial surveys that introduce significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. Neglecting to incorporate or properly assess such data results in an incomplete baseline, consequently weakening the reliability of the presented conclusions.

These methodological shortcomings render the conclusions of negligible or non-significant effects reliant on assumptions rather than robust evidence. The lack of sufficient baseline data obstructs meaningful evaluation of cumulative and indirect impacts, which includes considerations for seasonal variation and broader ecosystem interactions. This uncertainty complicates understanding the true scale of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development presents substantial flaws, characterised by significant evidence gaps and internal contradictions that challenge its 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 does not adequately demonstrate that these species will remain unaffected, failing to meet the necessary evidential standard. The placement of turbines within key foraging areas and migratory pathways raises critical concerns, yet the assessment does not sufficiently evaluate the risks associated with displacement, collision, or habitat loss.

A critical inconsistency arises within the application, wherein the developer asserts that there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction undermines the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not face negative impacts. The significance of these vital feeding grounds is not fully recognised, and reliance on modelling techniques introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is insufficient and behavioural responses are not comprehensively understood.

The siting of turbines within a recognised migratory corridor adds another layer of risk, effectively obstructing 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 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 requirements necessary to affirm no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle and precludes a lawful conclusion in support of consent.

The identified deficiencies also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable due to methodological shortcomings, internal inconsistencies, and insufficient evidence. Such inadequacies obstruct a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

FISHERIES AND MARINE LIFE

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

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

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

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

Moreover, the assessment neglects to address cumulative impacts stemming from multiple factors such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined pressures, it is impossible to determine the overall consequences for marine ecosystems and socio-economic conditions.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a

continuous and intrusive "wall of light" effect on the western horizon. This change would fundamentally alter the night-time environment.

The application lacks a thorough evaluation of how this lighting might impact visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the area's identity and the growing tourism sector focused on astro-tourism. The absence of these considerations results in a notable deficiency in the overall landscape and environmental evaluation.

Moreover, there has been no assessment of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to the effects of artificial lighting due to phototaxis, which can result in disorientation and a heightened risk of collision. The application fails to include any form of lighting impact assessment or phototaxis study, neglecting to examine how aviation lighting may influence these species or contribute to increased mortality.

This lack of evaluation is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activity or its associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation due to artificial lighting, yet this potential hazard has not been assessed. The absence of site-specific night-time data creates a substantial void in understanding ecological impacts.

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

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

Overall, the lack of any assessment regarding dark skies and nocturnal wildlife constitutes a considerable evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of facilitating a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation

was a concern. This new application is presented within a stronger policy framework that places significant emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential basis for determination is lacking, characterised by critical gaps in baseline data. The ongoing use of an undefined design envelope and reliance on unspecified mitigation measures further undermine its credibility. Additionally, important impact pathways, such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism implications, have been omitted. As a result, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment contravenes the statutory duty established under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

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

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

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

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

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

Additional Comments

Renewable energy doesn't just have to involve the creation of endless gigantic windfarms. These destroy the natural habitats for both people and wildlife.

When I look at these immense turbines all I see is massive tall monoliths of steel (surely not 'green') and none recyclable turbines (certainly not 'green'). They cant even be used every day because every day isn't windy.

Surely, being earth-friendly should involve other means, such as harnessing power from the sun and waves, not just building more and more wind towers all over the countryside and in the sea.

It's just wrong and future generations will wonder what on earth we were thinking.

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: 29B7F02D

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline and rich cultural identity. Concerns arise from the scale, proximity, and design of the wind farm, raising questions about its alignment with statutory requirements, national policy, and sustainable development principles.

A critical review of the Environmental Impact Assessment Report reveals that the application lacks an adequate evidential basis for a lawful determination. There is missing critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, key aspects of the proposal remain undefined, which hinders a clear understanding of its likely significant effects. The use of a flexible design framework complicates the assessment further, while the unspecified reliance on mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by robust evidence.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally insufficient and fails to recognise the West Lewis coastline as a dynamic cultural landscape where language, tradition, environment, and community are intrinsically

linked. The approach taken in the application is overly simplistic, viewing heritage merely as isolated, static assets instead of acknowledging their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial grounds and spaces for spiritual practice, yet the assessment mischaracterises them as static features. This oversight disregards their continued use and significance, as well as the impact of development on their settings. Consequently, the evaluation of cultural effects is incomplete and overlooks their importance in community life.

Furthermore, the application neglects intangible cultural heritage, including the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely missing from the assessment, representing a considerable omission. The cultural impact of the development cannot be adequately grasped without considering these elements.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity and recognised characteristics of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to uphold 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, which is mandated 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 impacts on the island community. This omission alone renders a lawful determination impossible.

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

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory duties results in a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application fails to present a robust foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment represents a critical flaw in the evaluation process. The developer has conducted focus groups with local residents; however, the full report remains unpublished. This omission creates a

significant evidential gap that hinders both public understanding and the competent authority's ability to assess the potential social risks identified in the developer's own research.

Summaries that are available reveal that local residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not merely speculative in nature. Nevertheless, without access to the complete assessment, proper scrutiny of these findings is compromised, limiting the opportunity to evaluate their significance in the decision-making process.

Moreover, the proposal has been perceived as a direct threat to community identity and cohesion, with the developer's own findings indicating a concern for "cultural loss." However, these serious impacts have not been adequately incorporated into the main application or given the necessary weight in the evaluation process. The withholding of the full Social Impact Assessment obscures the real human and social costs associated with the development.

This deficiency in transparency has broader implications for 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. The failure to provide the complete dataset limits the application's ability to present a thorough evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to foster positive health outcomes and mitigate harm. However, the evidence suggests that adverse effects already exist and have not been fully disclosed. Without the full assessment, it is impossible to demonstrate adherence to this policy.

The procedural consequences are considerable. The competent authority is unable to perform a rigorous socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission within the application and signifies a failure to meet the evidential standards set by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application presents significant deficiencies in its assessment of seascape, landscape, and visual impacts. It fails to accurately reflect the scale of change and the sensitivity of the West Lewis coastline, characterised by its open Atlantic horizon and

undeveloped character. The introduction of large-scale turbines near the shoreline would establish a continuous and dominant industrial presence, fundamentally transforming this landscape and resulting in a permanent alteration of its character.

Moreover, the magnitude of visual change is not adequately represented. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, thereby directly impacting visual amenity and eroding the essential qualities of naturalness and remoteness. The assessment lacks a proper conveyance of this level of impact or its significance, given the sensitivity of the landscape.

Methodological issues further exacerbate the assessment's shortcomings, particularly regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints do not sufficiently represent 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 magnitude of visual impact has been understated, compromising the reliability of the assessment.

Additionally, the application neglects to assess the interconnectedness of landscape, seascape, and cultural heritage adequately. Notably, significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to recognise 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, changing the context in which heritage assets are perceived and severing their link to the natural horizon. This constitutes not only a visual impact but also a broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which emphasises the need to protect natural places and historic assets. The extent of the proposed changes is at odds with the requirement to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in a dominant and unavoidable presence. Therefore, the resulting changes are fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the assessment of fisheries and marine life within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. It fails to demonstrate that these critical uses and habitats can be safeguarded without substantial disruption.

One major concern is the assumption that fishing activities can be displaced without repercussions. The application does not provide any evidence indicating that there are alternative fishing grounds that are accessible and able to bear the additional pressure. This gap in information is crucial, as the potential for displacement risks overfishing in other areas, which could lead to broader economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, the repercussions for fisheries and local livelihoods remain unclear.

Furthermore, the proposal presents significant risks to marine species, particularly due to underwater noise created during construction activities. The use of high-energy hammer piling over an extended duration is expected to disturb marine life across considerable distances, notably affecting species such as dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population is alarming; nonetheless, the application minimizes the importance of these effects without adequate evidence to support such claims.

There is a clear contradiction within the application regarding the requirement for licences to permit harm to European Protected Species, while simultaneously categorising impacts as negligible. This inconsistency undermines the assessment's credibility and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity. This lack of clarity prevents any conclusion that the proposal is sustainable.

In summary, the inadequacies in 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 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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential requirements. The issues central to this application echo those that led to the 2008 rejection of the Lewis Wind Power proposal, where the degree of industrialisation was deemed unacceptable. This current proposal is presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing.

The application is lacking a complete and reliable evidential basis for decision-making. There are notable deficiencies in baseline data, the continued utilisation of an undefined design envelope, and an overreliance on unspecified mitigation measures. Moreover, it fails to address key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is insufficient and does not facilitate a thorough understanding of significant effects or residual impacts.

Procedural inadequacies are also evident. The absence of a compliant Island Communities Impact Assessment is a violation of the statutory duties mandated by the Islands (Scotland) Act 2018, and the non-disclosure of a complete Social Impact Assessment constitutes 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.

Additionally, the proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural areas, and cultural heritage, nor does it prove that impacts on health and wellbeing are acceptable. Furthermore, it lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently assessed, leaving the implications for peatlands, carbon balance, habitats, and crofting land unclear.

There are considerable uncertainties regarding environmental risks that may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

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 should refuse consent on these grounds or enforce the relevant regulatory provisions to obtain the necessary missing information.

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

Additional Comments

I do believe that this offshore windfarm will be detrimental to the islands, I do not believe it should go ahead given the impact it will have on the local economy and strain it will add to an island community already at its limits in nearly every sector.

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: A2A73F73

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and its supporting documentation, revealing significant deficiencies across various dimensions, including planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise from the scale and design of the proposal, particularly regarding its adherence to statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful determination. Key environmental data is absent, baseline information is inadequate and inconsistent, and crucial elements of the proposal remain undefined. The reliance on a flexible design framework hinders the ability to evaluate likely significant effects, and the unspecified nature of mitigation measures prevents assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by reliable evidence.

Moreover, there are significant conflicts with established policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and overall environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, compromising the capacity of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines positioned close to the shoreline, raises critical concerns about landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and lacks a transparent account of the likely environmental impacts of the proposal. The flexibility in the Project Design Envelope, which does not commit to specific dimensions or layouts of turbines, introduces uncertainty. This makes it difficult to apply a worst-case scenario consistently. As a result, the assessment's integrity is undermined, and the information presented may not accurately reflect the eventual development. This situation hampers both public understanding and the competent authority's ability to gauge the true environmental effects.

The application depends on mitigation measures, monitoring strategies, and management plans that are still to be defined. Seeking consent under these conditions means that potential environmental harm may be addressed later, complicating any assessment of effectiveness or residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which requires that significant effects and mitigation strategies are clearly established before any decision is made.

There are also considerable gaps in baseline data, limitations in methodology, and a reliance on assumptions instead of site-specific evidence. These deficiencies lead to uncertainty about the scale and significance of the impacts, especially where claims of negligible or non-significant effects lack robust data to back them up. Insufficient information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that does not meet statutory obligations.

Consequently, the application does not meet the evidential threshold outlined in the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to comply with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that adequate safeguards are established.

Overall, the reliance on an undefined design envelope, the lack of specified mitigation measures, and gaps in baseline data contribute to an unreliable and incomplete Environmental Impact Assessment Report. These issues hinder a lawful and thorough evaluation 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 assessment of marine ecology and protected species associated with the proposed development is seriously flawed. It does not offer a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its high sensitivity and biological activity, yet the baseline data is lacking. The methods employed do not adequately capture the presence, behaviour, or habitat use of species in the region. Consequently, the assessment fails to provide a sound basis

for evaluating the potential impacts of the project.

There is a significant oversight concerning otters, which are classified as a European Protected Species. The application neglects to properly recognise and assess their active use of coastal regions for foraging and movement. The failure to consider their core foraging range and behaviour means that the potential impacts of construction-related disturbances, noise, and increased activity have not been sufficiently evaluated. This gap undermines any conclusions about the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment that contains significant gaps in evidence and internal inconsistencies, which undermine its conclusions. The west coast of the Isle of Lewis hosts internationally important seabird populations that are already in decline. However, the application fails to demonstrate to the required evidential standard that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the development, yet the assessment lacks a robust evaluation of the implications regarding displacement, collision risk, or habitat loss.

A notable contradiction arises in the application, where the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is typically warranted only when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, indicating that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment inadequately addresses the potential impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly considered, and reliance on modelling approaches introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality due to incomplete baseline data and an insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor creates a considerable risk, effectively establishing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately assessed, nor are the potential effects on species with relatively small global populations given the necessary attention.

From a regulatory standpoint, the application does not fulfil the evidential threshold required to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and modelling deficiencies, means that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, which precludes a lawful conclusion in favour of consent.

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

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These failings obstruct a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for a proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity fails to recognise the West Lewis coastline as a living cultural landscape. This landscape is shaped by the connections between the environment, language, tradition, and community. The application reduces heritage to isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated inadequately. These sites serve as active places for burial and spiritual

practice. However, they are characterised as static features, which overlooks their continued use and the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of the cultural effects and ignores their importance in community life.

The assessment also overlooks intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These factors are central to the area's identity, yet they are entirely absent from the assessment, representing a significant omission. Without considering these elements, the cultural impact of the proposed development cannot be accurately understood.

There are also concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised as characteristics of an Indigenous People. However, no process of Free, Prior and Informed Consent has been undertaken. The lack of meaningful engagement undermines the legitimacy of the assessment and does not reflect established principles of participation in decisions that affect cultural and environmental interests.

A significant procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is essential for the competent authority to evaluate the social, cultural, and economic impacts on the island community. Without it, the determination of the application cannot be deemed lawful.

From a policy perspective, the deficiencies in the assessment conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to acknowledge both tangible and intangible heritage, along with living cultural practices, deviates from policy requirements.

The collective failures to assess living heritage, intangible cultural value, community rights, and statutory obligations create a significant evidential gap. The cultural impacts of the development remain unassessed, and the application does not provide a sufficient basis for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally flawed, failing to account for the scale of change and the sensitivity of the environment. The West Lewis coastline, characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness, would be irreversibly altered by the introduction of large-scale turbines near the shoreline. This would create a continuous industrial presence that drastically transforms the area's character.

Moreover, the application inadequately conveys the extent of the visual change. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby negatively affecting visual amenity

and compromising the essential qualities of naturalness and remoteness. The assessment does not sufficiently articulate the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology employed 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, particularly concerning key cultural heritage sites and high-value landscapes. This shortcoming raises the possibility that the visual impacts have been understated, compromising the reliability of the overall assessment.

Additionally, the failure to consider the interconnected relationship between landscape, seascape, and cultural heritage represents a further deficiency. Important 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. By treating these assets as isolated, the assessment overlooks their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This impact is not limited to the visual realm; it encompasses broader cultural and spatial harm that has not been thoroughly examined in the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, particularly in terms of protecting natural places and historic assets. The scale of the proposed changes is incompatible with the imperative to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertion of compliance with policy requirements.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. The resultant changes are thus fundamental and permanent, rather than reducible to an acceptable level through mitigation measures.

Collectively, these deficiencies illustrate that the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. Consequently, this undermines a reliable evaluation and reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application proposes substantial seabed preparation and installation works in a high-energy Atlantic environment; however, the assessment of construction and pollution risks is incomplete. There are no fully developed Construction Environmental

Management Plans or Pollution Prevention Plans, which results in reliance on mitigation and contingency measures that are to be prepared after consent. This approach prevents any meaningful evaluation of their adequacy or effectiveness.

The lack of defined future measures is especially concerning given the sensitivity of the receiving environment along the West Lewis coastline, which supports clean coastal waters and habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient detail on prevention, control, or monitoring of these risks.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the extent, duration, or ecological effects of these impacts cannot be determined. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and a lawful determination cannot be made in the absence of such information. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the shortcomings arising from the absence of defined mitigation measures, lack of detailed management plans, and the uncertainty regarding potential impacts render the assessment materially deficient. These issues hinder a robust evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the assessment of fisheries and marine life associated with the application is insufficient and does not provide a robust evaluation of ecological or socio-economic impacts. A critical concern is the flawed assumption that fishing activity can be displaced without consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of supporting the additional pressure that displacement would create. This oversight is

significant as it risks overfishing in other areas and could lead to broader economic repercussions for the local fleet. The lack of a clear and evidence-based assessment means that the impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal introduces considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to disturb a wide range of marine life, including species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the significance of these effects without providing sufficient supporting evidence.

Inconsistencies within the application are also notable. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation. Furthermore, the assessment does not take into account cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and fishing displacement. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be properly determined.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which prevents any conclusion that the proposal reflects sustainable development. In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies collectively render the assessment incomplete and unreliable. These deficiencies hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not adequately consider the impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are inherently connected, yet they are assessed in isolation. This fragmented approach obscures the true extent of environmental and socio-economic effects.

The onshore components consist of cabling across protected moorland, the construction of a substation near Stornoway, and the required access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The current application lacks a comprehensive assessment of these impacts, thus hindering a full understanding of the project's overall environmental footprint.

Exclusion or deferment of onshore impact assessments prevents a thorough evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively; however, the segmentation of offshore and onshore elements leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

Moreover, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application fails to demonstrate that the impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been implemented. This creates a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance also arise from the proposal. The disturbance of peatland results in the release of stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this issue nor does it show that the overall carbon balance remains beneficial.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide evidence that the requisite consents or processes have been initiated, which raises questions about the deliverability and lawful execution of the project.

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

In summary, the division of project components, the lack of a comprehensive assessment, and the absence of evidence regarding environmental and land use impacts result in this section of the application being incomplete and unreliable, which obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is defined by its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. The proposed development introduces permanent red aviation lighting that would be visible over great distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment.

Crucially, the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. The absence of an evaluation of nocturnal wildlife impacts is particularly alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and increased risks of

collision. The lack of a lighting impact assessment or phototaxis study in the application means that the potential effects of aviation lighting on these species and their mortality rates remain unexamined.

This deficiency is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and associated risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation due to artificial lighting; however, this risk has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, it undermines the comprehensive assessment of landscape and seascape impacts, given that night-time character is a fundamental aspect of the environment.

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

SUMMARY

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

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

Procedural deficiencies are also apparent. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the complete Social Impact Assessment is a

material omission. These shortcomings inhibit the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

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

Moreover, the proposal would lead to considerable and irreversible changes to a sensitive landscape. Industrialization along the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and impacts on tourism will result in permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The volume of missing information, policy conflicts, and unresolved environmental risks impede a lawful and evidence-based decision. The competent authority should either refuse consent based on these grounds or utilize the relevant regulatory provisions to require the submission of the outstanding information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E140DFDC

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and the accompanying documentation, highlighting significant deficiencies across various aspects including planning, environmental, cultural, and procedural matters. The project is situated off the west side of the Isle of Lewis, a region known for its rugged, Atlantic-facing coastline, largely untouched natural environment, and strong cultural heritage. Concerns are raised regarding the scale, design, and proximity of the wind farm, which may not align with statutory requirements, national policy, or the principles of sustainable development.

A critical examination reveals that the application lacks a sufficient evidential basis to allow for a lawful determination. Essential environmental data is absent, the baseline information provided is inconsistent and limited, and many key elements of the proposal remain undefined. The flexible design framework employed obscures potential significant effects, while the unspecified mitigation measures render any evaluation of their effectiveness impossible. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsubstantiated by strong evidence.

There are evident policy conflicts that cannot be overlooked. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding issues of biodiversity, natural places, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements that protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent and weaken the competent authority's ability to determine the project's acceptability according to policy standards.

The scale of this development is unprecedented for this area, with large turbines being proposed in close proximity to the shoreline, raising substantial concerns over landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, weaknesses in evidence, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. Given these circumstances, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to adequately account for the likely environmental effects associated with the proposal. The use of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty. This flexibility undermines the integrity of the assessment process and prevents a consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately reflect the development that is ultimately built, thereby hindering both public understanding and the ability of the competent authority to grasp the true extent of environmental effects.

Furthermore, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be mitigated later inhibits a thorough evaluation of effectiveness and the assessment of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation strategies must be clearly established before any determination can occur.

Evidential deficiencies are also notable, with significant gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This situation results in uncertainty concerning the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information impedes a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. The precautionary principle becomes particularly relevant regarding protected species and sensitive habitats. Additionally, the proposal does not comply with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and rigorous assessment of environmental effects, meaning the competent authority lacks the necessary information to make an informed decision on the application.

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in its assessment of alternatives, which do not meet the statutory requirements of the Environmental Impact Assessment regime. It fails to provide a structured and reasoned comparison of realistic alternatives based on their environmental effects. Instead, it offers a narrative account of the

project's evolution, which does not effectively demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Moreover, there is a lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. The developer has not adequately considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to the shore in determining impact, the absence of this analysis means it cannot be concluded that the proposed siting is the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including cultural and spiritual sites like Barvas Cemetery. The lack of a clear avoidance strategy, along with the absence of comparative analysis, indicates that mitigation by design has not been adequately considered, resulting in an over-reliance on post-design mitigation measures.

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

From a policy standpoint, these deficiencies undermine compliance with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, providing an incomplete understanding of the ecological receptors in the West Lewis coastal environment. This marine system is both sensitive and biologically active, yet the baseline data is lacking, and the methodologies used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant oversight is the treatment of otters, a European Protected Species. The application does not sufficiently acknowledge their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects from construction disturbance, noise, and increased activity. This gap undermines any claims regarding the lack of significant effects on this species.

The assessment also reveals shortcomings in evaluating basking sharks, with heavy reliance on aerial surveys that introduce considerable detection bias, particularly under Atlantic conditions. This method likely underrepresents their presence when compared to established land-based observations, which show frequent use of these waters. Not incorporating or accurately considering such data results in an incomplete baseline, reducing the reliability of the conclusions drawn.

These methodological flaws mean that any conclusions suggesting negligible or non-significant effects are based on assumptions rather than solid evidence. Additionally, insufficient baseline data hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4. Protected species have not been properly identified or assessed, and the level of uncertainty undermines the ability to exclude adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle. Under these conditions, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application raises immediate concerns due to significant gaps in evidence and inconsistencies within the ornithological assessment, which severely undermine its conclusions. It is crucial to recognise that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already facing decline. However, the application fails to provide adequate proof that these species will not suffer adverse effects. Key foraging areas and migratory pathways are located in the vicinity of the development, yet the assessment lacks a thorough evaluation of the potential implications related to displacement, collision risks, or habitat loss.

Moreover, a fundamental contradiction arises within the application itself. The developer asserts that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment and suggests that its conclusions lack sufficient backing from the evidence presented.

Additionally, the assessment does not convincingly establish that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical significance of these feeding grounds has not been fully accounted for, and the reliance on modelling approaches introduces further uncertainty, particularly

concerning species like Kittiwakes and Fulmars that are already in severe decline. The methodologies utilised are likely to underestimate mortality, particularly where there is incomplete baseline data and insufficient understanding of behavioural responses.

Furthermore, the positioning of turbines within a recognised migratory corridor presents an additional and grave risk, creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The assessment fails to adequately address the long-term consequences of sustained mortality in this corridor, as well as the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to assert that there will be no adverse effect on the integrity of 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, thereby obstructing a lawful conclusion in favour of consent.

The identified deficiencies reflect a failure to comply with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The lack of evidence demonstrating that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment's reliability is compromised by internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a thorough evaluation of impacts and ultimately lead to the conclusion that the application does not fulfil the statutory requirements necessary for a proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely lacking. It does not recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interconnected. Instead, the application simplifies heritage by viewing it as a collection of isolated and static assets, overlooking their ongoing social, cultural, and spiritual significance within the community.

One significant issue is the handling of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet they are treated as unchanging features in the assessment. This approach neglects their continued use and significance, as well as the effects of development on their surroundings. Such misrepresentation leads to an incomplete understanding of cultural impacts and fails to acknowledge their importance to community life.

Moreover, the assessment does not address intangible aspects of cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the

community and the coastal environment. These elements are vital to the area's identity but have been entirely omitted from the evaluation, creating a major gap. Without these considerations, the cultural impact of the development remains inadequately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity recognised as characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement questions the validity of the assessment and does not adhere to established principles for participation in decisions that affect cultural and environmental interests.

A significant procedural flaw is the failure to carry out a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot legally assess the social, cultural, and economic impacts on the island community. This omission alone hinders a lawful determination.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, especially regarding the safeguarding of historic assets and sites. The neglect to consider both tangible and intangible heritage, along with the failure to recognise living cultural practices, diverges from policy requirements.

Overall, the inadequate assessment of living heritage, intangible cultural values, community rights, and statutory obligations leads to a considerable evidential gap. The cultural effects of the development have not been thoroughly evaluated, and the application fails to provide a solid foundation for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the complete report has not been made public. This situation creates a significant evidential gap that hinders both the public and the competent authority from fully understanding the social risks identified through the developer's own research. Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore based on real experiences rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is not possible, limiting the ability to gauge their significance in the decision-making process.

Additionally, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted within the developer's own findings. Despite this recognition, these impacts have not been adequately incorporated into the main application or given the weight they deserve. The lack of disclosure regarding the complete Social Impact Assessment obscures the true human

and social costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be at risk. By failing to provide the complete dataset, the application does not offer a thorough evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and avoid harm, yet the evidence currently available indicates adverse effects that have not been fully disclosed. Consequently, it cannot be established that compliance with this policy is met in the absence of the full assessment.

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

Overall, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This shortcoming prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts regarding the proposed development is significantly lacking, failing to accurately convey the extent of change and the sensitivity of the environment involved. The West Lewis coastline is characterised by an open Atlantic horizon and an undeveloped nature that contributes to a strong sense of remoteness. The proposed large-scale turbines, located in close proximity to the shoreline, would create a continuous industrial presence that fundamentally changes this character, leading to a permanent and irreversible transformation of the landscape.

Moreover, the application inadequately reflects the magnitude of visual change that the turbines would introduce. Their scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the natural qualities that define the area. The assessment does not sufficiently capture the significance of this impact in the context of such a sensitive landscape.

Methodological issues further complicate the assessment, particularly concerning the selection of visual viewpoints. There is evidence indicating that these viewpoints may not adequately represent sensitive receptors or worst-case scenarios, especially in

relation to key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been underestimated, which undermines the credibility of the assessment.

Additionally, the assessment fails to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated elements results in a failure to appreciate their interdependence and leads to an incomplete evaluation of impacts on their setting and cultural significance.

The potential industrialisation of the seascape would disrupt these vital relationships, altering how heritage assets are perceived and diminishing their connection to the natural horizon. This represents not only a visual concern but also a broader cultural and spatial impact that has not been sufficiently evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The scale of the intended changes 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 weakens any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. Therefore, the resulting change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation measures.

Collectively, these issues demonstrate that the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. Such deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the protection of this unique landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. The application fails to provide a comprehensive assessment of construction and pollution risks, lacking the necessary detail to evaluate potential environmental effects. Substantial seabed preparation and installation works are proposed in a high-energy Atlantic environment, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application defers to mitigation and contingency measures that are to be established post-consent, which impedes any meaningful assessment of their adequacy or effectiveness.

The reliance on undefined future measures raises significant concerns, particularly in light of the sensitive nature of the receiving environment. While the application

acknowledges potential risks, such as sediment mobilisation and accidental chemical or oil spills, it does not adequately address how these risks will be prevented, controlled, or monitored. Moreover, there is a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly articulated management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to the potential effects on marine species and habitats that have already been identified as sensitive within 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 measures are in place to respond to pollution events. 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 deferral of essential environmental safeguards contradicts the requirements stipulated by the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to granting consent, and the absence of such information renders a lawful determination impossible. Additionally, the application fails to demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application does not adequately address the ecological and socio-economic impacts on these vital resources. It lacks a robust evaluation and fails to demonstrate how the fishing activity and habitats can be preserved without significant disruption.

A critical concern is the assumption that fishing can be displaced without negative consequences. The application offers no evidence that alternative fishing grounds are available or capable of absorbing the additional pressure from displaced activities. This is a serious oversight, as displacement could lead to overfishing in other areas and adversely affect the local fishing fleet's economic stability. Without a clear and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

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

distances, potentially impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without providing sufficient evidence.

There is a notable inconsistency within the application regarding the need for licences for harm to European Protected Species while simultaneously asserting that the impacts are negligible. This contradiction raises significant questions about the credibility of the assessment and compliance with the Habitats Regulations, especially where harm necessitates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without an exhaustive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be fully understood.

From a policy standpoint, the application fails to demonstrate alignment 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, thus precluding any assertion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The failure to assess the project as a whole raises significant concerns regarding the impacts on land use and legal rights. The routing of infrastructure through active croft land introduces potential conflicts, and the application lacks evidence that necessary consents or processes have been initiated. This absence of documentation leads to questions about the deliverability and lawful implementation of the project.

Furthermore, the assessment of onshore infrastructure is materially incomplete, which obscures the true scale of environmental and socio-economic effects. The offshore turbines and onshore works are intrinsically linked, yet they are assessed separately, resulting in a fragmented approach that fails to consider the cumulative effects of the project. By excluding or deferring the assessment of onshore impacts, a proper evaluation of cumulative effects on peatlands, habitats, and communities cannot be achieved.

The onshore elements involve construction activities such as cabling across protected moorland and the establishment of a substation near Stornoway. These works require excavation across deep peat areas, particularly within Barvas Moor, which is both a significant carbon store and an ecologically sensitive habitat. The application does not provide a comprehensive assessment of these impacts, preventing a full understanding

of the project's overall environmental footprint.

There are also considerable risks to sensitive habitats, including machair systems and peatland environments, which are subject to policy protection. The application fails to demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been applied, creating a clear evidential gap regarding biodiversity protection.

Additionally, the proposal raises concerns about carbon balance. Disturbance of peatland releases stored carbon, potentially creating a carbon debt that contradicts the objectives of renewable energy development. The application does not adequately address this issue or demonstrate that the overall carbon balance remains beneficial.

From a policy perspective, the separation of project components and the inability to demonstrate protection of peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The lack of evidence to show that impacts can be avoided or mitigated undermines the application and highlights its incompleteness and unreliability, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline boasts exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will be visible across long distances, creating an intrusive "wall of light" effect that will fundamentally change the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the local identity and the emerging astro-tourism sector. Consequently, there exists a clear gap in the overall landscape and environmental assessment due to this oversight.

Equally concerning is the complete absence of an evaluation regarding the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting, as it can lead to disorientation and increased collision risks. The application lacks any lighting impact assessment or phototaxis study, thereby failing to examine how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment only exacerbates the issue, as it does not account for nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data constitutes a serious gap in understanding the potential ecological impacts.

Without an assessment of nocturnal impacts, it becomes 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, thus engaging the precautionary principle and hindering a lawful determination.

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

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

TOURISM

The proposal for large-scale offshore infrastructure significantly overlooks the assessment of tourism impacts, failing to evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism is inherently tied to the region's wild coastline, near-pristine landscapes, dark skies, and the overall sense of remoteness. While the application states that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how such development would influence visitor numbers, behaviour, or the economic contribution of tourism.

Since 2017, tourism has seen considerable growth, with its value rising from £65 million to over £81.5 million. This sector now supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Despite these figures, the application fails to model the potential impact of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains impossible to ascertain whether the development would result in a net economic benefit or jeopardise this established and expanding sector.

Moreover, the assessment neglects to address the critical role of environmental quality in enhancing the tourism experience, particularly regarding the significance of unspoiled landscapes and dark skies for visitors. Emerging markets, such as nature-based tourism and astro-tourism, rely heavily on these factors. The lack of a Dark Skies Assessment exacerbates this shortfall, leaving a considerable gap in understanding the impacts on a recognised and growing part of the local economy.

For an island community characterised by limited economic diversification, the oversight in assessing tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been

adequately evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the obligation to illustrate net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, lacking the necessary evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental drivers affecting visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This gap hinders a thorough evaluation of the economic effects, reinforcing the notion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the criteria for sustainable development as mandated by statutory duties, national policy, and evidential standards. It echoes the same principal concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extensive industrialisation proposed was deemed unacceptable. Although presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not provide a thorough or reliable evidential foundation for decision-making.

There are notable deficiencies in baseline data, and the application relies on a vaguely defined design envelope. It also depends on unspecified mitigation measures and neglects critical impact pathways, including the effects on nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to offer a complete understanding of significant likely effects or residual impacts.

Furthermore, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment contravenes statutory requirements under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment is a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal also contradicts National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural spaces, and cultural heritage, fails to assure that health and wellbeing impacts are acceptable, and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, leaving obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially grave. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and

inconsistent. The necessary evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

In summary, the application is procedurally and substantively unsuitable for determination. The abundance of information gaps, policy discrepancies, and unresolved environmental risks precludes a lawful, evidence-based decision. The competent authority must either deny consent on these grounds or exercise the relevant regulatory provisions to request the missing information.

Thus, I formally request 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: 13B2DFAF

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A comprehensive review of the Environmental Impact Assessment Report and accompanying documentation has highlighted significant deficiencies in planning, environmental, cultural, and procedural aspects of the proposal. Situated off the west coast of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns regarding the development's compatibility with statutory obligations, national policy, and sustainable development principles arise due to its scale, proximity to the shoreline, and design features.

The application lacks an adequate evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent, leaving key elements of the proposal undefined. Furthermore, the use of a flexible design framework obfuscates the understanding of potential significant effects, while the dependence on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not facilitate a comprehensive or informed evaluation of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence to substantiate them.

There are evident and substantial conflicts with policy requirements. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national standards for protecting biodiversity, climate considerations, and environmental integrity. These policy conflicts directly impact the statutory tests essential for consent and jeopardise the competent authority's ability to determine the development's acceptability from a policy standpoint.

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

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 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 raises significant concerns regarding its reliability due to substantial internal inconsistencies and methodological weaknesses. It is crucial to highlight that the application fails to provide adequate evidence that internationally important seabird populations on the west coast of the Isle of Lewis,

many of which are already in decline, will remain unaffected. The site is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss have not been thoroughly evaluated.

A fundamental contradiction exists within the application itself; while the developer asserts that there are no significant adverse effects, they simultaneously present a case for Habitats Regulations derogation, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the validity of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available. Furthermore, the methodologies used in the assessment are likely to underestimate mortality rates, especially for species like Kittiwakes and Fulmars, where baseline data is lacking and behavioural responses remain unclear.

The positioning of turbines within a recognised migratory corridor presents an additional risk, as it creates a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. There has been insufficient evaluation of the long-term consequences of sustained mortality in this corridor or the potential repercussions on species that have 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 gaps in data and limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful conclusion in favour of consent.

Moreover, the deficiencies identified in the assessment represent a failure to adhere to the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that these critical seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

In summary, the assessment is fundamentally flawed, characterised by internal inconsistencies, inadequate methodologies, and a lack of sufficient evidence. These issues collectively hinder a thorough evaluation of impacts, leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped landscape that conveys a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts is significantly lacking, failing to reflect the scale of change and the sensitivity of this environment. The introduction of large-scale turbines near the shoreline would establish a continuous and dominant industrial presence, fundamentally transforming the character of this area and leading to a permanent and irreversible alteration of the landscape.

This application does not adequately depict the extent of visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the defining qualities of naturalness and remoteness. The assessment inadequately conveys the level of this impact or its significance within such a sensitive landscape context.

Methodological issues are evident in the selection and presentation of visual viewpoints. Evidence indicates 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. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the overall assessment.

Another significant oversight is the failure to examine the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the broader landscape, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated entities rather than acknowledging their interdependence, resulting in an incomplete evaluation of impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and their connection to the natural horizon. This not only reflects a visual impact but also indicates broader cultural and spatial harm that has not been thoroughly assessed within this application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 concerning the protection of natural places and historic assets. The extent of change is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment further calls into question any claims of compliance with policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. As such, 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 capture 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 assertion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns due to the incomplete assessment of construction and pollution risks, failing to provide the necessary detail to fully evaluate likely environmental effects. With substantial seabed preparation and installation works planned in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. The application's reliance on mitigation and contingency measures that are to be prepared post-consent effectively thwarts any meaningful assessment of their adequacy or effectiveness.

This lack of clarity is particularly troubling given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

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

The absence of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application undermines the opportunity for evaluating whether the necessary safeguards are in place to adequately respond to pollution events. This procedural risk complicates the assessment by the competent authority concerning environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards stands in direct conflict with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and necessary mitigation be assessed prior to consent; without such information, a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of fisheries and marine life, which is crucial given the diverse marine ecosystem and active fishing industry off the West

Lewis coast. There is a failure to demonstrate that these important habitats and uses can be preserved without substantial disruption. A key concern arises from the unfounded assumption that fishing activities can be displaced without adverse effects. The application does not provide any evidence that alternative fishing grounds are available, accessible, or capable of supporting increased pressure. This significant omission raises the risk of overfishing in other areas, potentially leading to broader economic repercussions for the local fishing fleet. Without a clear, evidence-based evaluation, the implications for both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended period is expected to disturb a wide area, impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate supporting evidence.

There is an evident contradiction within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously declaring the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially when harm is anticipated to a level that requires legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts arising from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. The absence of a comprehensive evaluation of these combined effects hinders the ability to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

permanent red aviation lighting that would be visible over long distances. This would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

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

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

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

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails fundamentally to meet the requirements of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application recapitulates the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was determined. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not rectify past deficiencies.

The evidential basis for determination is both incomplete and unreliable. There are

notable gaps in baseline data, an undefined design envelope is maintained, and unspecified reliance on mitigation measures persists. Additionally, key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment remains incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural failings are evident, notably the lack of a compliant Island Communities Impact Assessment, which constitutes a breach of the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment represents a material omission. These shortcomings inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately demonstrate the protection of biodiversity, natural places, or cultural heritage. It lacks evidence that health and wellbeing impacts are acceptable and fails to provide a net economic benefit due to insufficient tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been properly evaluated, masking effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal are both uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and preventing a lawful determination of acceptable impacts.

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

Collectively, these deficiencies in the application render it procedurally and substantively unfit for determination. The significant information gaps, alongside conflicts with policy and unresolved environmental risks, obstruct a lawful, evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory provisions to mandate the submission of the missing information.

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

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: D1EB92D4

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 based on a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the proposal's scale, proximity, and design, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Substantial conflicts with policy are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development as policy-compliant.

The unprecedented scale of the proposal raises significant concerns, with large turbines planned in close proximity to the shoreline, leading to issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In this context, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and fails to provide a clear and trustworthy account of the potential environmental effects of the proposal. The approach of using a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This lack of specificity undermines the assessment's reliability and means the impacts described may not accurately represent the final development, limiting the ability of the public and the competent authority to grasp the true environmental effects.

The application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions means that environmental harm will be addressed later, which hinders any genuine evaluation of effectiveness or assessment of remaining impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies should be clearly outlined before determination.

Furthermore, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obscures the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This situation 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 is not established that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation measures, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and robust assessment of environmental effects and leave the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed application lacks a thorough assessment of alternatives, failing to satisfy the statutory requirements set by the Environmental Impact Assessment regime. Instead of offering a structured comparison of feasible alternatives based on their environmental impacts, it merely recounts the project's development. This method does not sufficiently illustrate that less harmful options have been correctly identified, evaluated, and chosen over more damaging choices.

Furthermore, there is a lack of transparency and evidence in comparing various offshore sites, development sizes, or design configurations. Notably, the application does not show that the developer has adequately considered placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in assessing impact, the lack of this analysis makes it impossible to conclude that the proposed siting is the least damaging option.

The shortcomings also extend to the assessment of cable routing and landfall, where there is little evidence that alternative pathways have been explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis suggest that the application has not employed mitigation by design, instead depending on measures that would come after the design phase.

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

From a policy standpoint, these inadequacies compromise adherence to National Planning Framework 4, particularly concerning the protection of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a significant omission, which contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot be legally determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The application demonstrates significant deficiencies in the assessment of marine ecology and protected species, particularly concerning its understanding of ecological receptors in the sensitive and biologically active environment of West Lewis coastal waters. The methodologies employed are inadequate, leading to an incomplete baseline that fails to capture crucial details such as species presence, behaviour, and habitat use.

Notably, the assessment neglects to properly recognise otters, a European Protected Species, in their active utilisation of coastal areas for foraging and movement. This oversight extends to an inadequate consideration of their core foraging range and behavioural patterns, resulting in an insufficient evaluation of potential impacts from construction disturbances, noise, and increased human activity. Consequently, the assessment's conclusions regarding the absence of significant effects on otters lack a solid evidential basis.

Further issues arise in the evaluation of basking sharks, where the reliance on aerial surveys leads to a substantial detection bias, particularly in the challenging conditions of the Atlantic. This method is prone to underestimating the presence of basking sharks when juxtaposed with well-documented land-based observations that demonstrate their frequent use of these waters. The failure to adequately incorporate or consider such pertinent data results in an incomplete baseline and undermines the validity of the conclusions drawn.

These methodological shortcomings result in determinations of negligible or non-significant effects that rely more on assumptions than on robust evidence. Additionally, the lack of comprehensive baseline data hinders meaningful assessments of cumulative and indirect impacts, including variations due to seasonal changes and broader ecosystem interactions. This uncertainty raises concerns about the true risks faced by marine species and their habitats.

From a regulatory standpoint, the application does not align with the stipulations of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an inadequate identification and assessment of protected species. The uncertainty introduced by these deficiencies prevents the exclusion of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Thus, the issuance of consent cannot be justified within the legal framework.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions collectively renders the assessment unreliable. These shortcomings impede a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application is unsupported by a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A fundamental contradiction exists within the application, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is required only in instances where significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment and indicates that the conclusions drawn are not substantiated by the supporting evidence. The assessment fails to provide adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain

unaffected. The significance of these feeding grounds is not fully acknowledged, and reliance on modelling approaches creates uncertainty, particularly for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly given the incompleteness of baseline data and the incomplete understanding of behavioural responses.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a dynamic cultural landscape that integrates environment, language, tradition, and community. The application takes a narrow view, treating heritage merely as a collection of disconnected, static assets instead of acknowledging their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is the treatment of culturally important sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice; however, the assessment misclassifies them as static features. This oversight neglects their ongoing significance and the implications of development on their surroundings, leading to an incomplete understanding of cultural effects and overlooking their importance in community life.

Additionally, the assessment fails to incorporate intangible cultural heritage elements, including the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. Such aspects are crucial to the area's identity but are completely omitted from the evaluation, which represents a major gap. Without including these factors, the cultural impacts of the development remain inadequately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity, identifiable as an Indigenous People, yet no Free, Prior and Informed Consent process has taken place. The lack of meaningful

engagement compromises the credibility of the assessment and does not align with accepted principles for participation in decisions affecting cultural and environmental interests.

Moreover, there is a critical procedural flaw in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This alone hampers a lawful determination.

From a policy standpoint, the deficiencies identified create a direct conflict with National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The neglect to assess both tangible and intangible heritage, alongside the failure to recognise living cultural practices, signifies a clear departure from policy stipulations.

Collectively, the oversight in evaluating living heritage, intangible cultural values, community rights, and legal obligations culminates in a notable evidential gap. The cultural impacts stemming from the development have not been thoroughly examined, and the application falls short of providing an adequate foundation for determining the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with this proposal is significantly deficient and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been published. This lack of disclosure creates a substantial evidential gap, making it impossible for both the public and the competent authority to grasp the full extent of the social risks identified in the developer's own research.

Reports indicate that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are therefore factual rather than speculative. The failure to make the full assessment available stifles proper scrutiny of the findings, thus limiting the capacity to evaluate their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal is seen as a direct threat to community identity and cohesion, with "cultural loss" noted within the developer's findings. However, these serious impacts have not been adequately incorporated into the main application, nor have they been afforded appropriate consideration. The withholding of the comprehensive Social Impact Assessment conceals the genuine human and social costs associated with the development.

This lack of transparency is detrimental to the Environmental Impact Assessment

process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functionality may be at stake. By not providing the complete dataset, the application fails to supply a comprehensive evidential basis needed to assess the balance between benefits and harms.

From a policy standpoint, the application does not meet the requirements of the National Planning Framework 4 concerning health and wellbeing. Development is expected to promote positive health outcomes and minimise harm; however, the available evidence reveals existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural implications of this situation are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission within the application, which fails to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This failure obstructs a lawful determination and underscores the conclusion that the application lacks sufficient information to warrant approval.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally flawed and does not sufficiently capture the extent of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by its unobstructed Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, located near the shoreline, would impose a continuous and overpowering industrial presence, which would irrevocably change this character and lead to a permanent transformation of the landscape.

Moreover, the application fails to accurately depict the extent of this visual alteration. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of this impact within the framework of such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. There is evidence that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the actual magnitude of visual impact has been minimised, which undermines the credibility of the assessment.

Additionally, the analysis neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are embedded within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as standalone entities, overlooking their interdependence and leading to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the experiences related to heritage assets and severing their ties to the natural horizon. This represents not only a visual impact but also a deeper cultural and spatial damage that has not been adequately examined in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which emphasises the need to protect natural places and historic assets. The scale of change proposed is at odds with the requirement to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further diminishes any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and closeness of the turbines, their presence would be overwhelming and inescapable. Consequently, the change is fundamentally permanent, rather than something that could be diminished to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

There is also a lack of clarity concerning the scale and behaviour of sediment plumes

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

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

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

Collectively, the lack of defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts result in a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of the proposal's impacts on fisheries and marine life is inadequate, lacking a comprehensive assessment of both ecological and socio-economic factors. The waters along the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not convincingly show that these vital habitats and fishing activities will be preserved without significant disruption.

A significant concern is the presumption that fishing activities can be shifted without repercussions. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure resulting from this displacement. This gap is crucial, as it raises the risk of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear and well-substantiated evaluation, the potential impacts on both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses serious risks to marine species, particularly due to underwater noise associated with construction activities. The use of high-energy hammer piling over an extended duration is expected to create disturbances that could affect a wide range of species, including dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is concerning, yet the

application minimizes these impacts without adequate evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction raises serious questions regarding compliance with the Habitats Regulations, especially since harm is expected at a level that necessitates legal authorisation.

The assessment does not adequately consider cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently establish that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thereby preventing any conclusion that the proposal is sustainable.

Overall, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the presence of internal contradictions render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally inadequate, failing to consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and the onshore works are interconnected; however, they are assessed in isolation, leading to a fragmented analysis that masks the actual extent of environmental and socio-economic consequences.

Onshore elements encompass cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure that runs through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically delicate habitat. The application lacks a thorough assessment of these impacts, which obstructs a comprehensive understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application fails to allow for a proper examination of cumulative effects. The Environmental Impact Assessment process stipulates that all components of a project must be assessed collectively; the division between offshore and onshore aspects results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats, including machair systems and peatland environments, both of which are subject to policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated or that appropriate avoidance strategies have been enacted. This absence highlights a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbance of peatland can lead to the release of stored carbon, potentially generating a carbon debt that undermines the objectives of renewable energy initiatives. The application fails to adequately address this matter or to show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application provides no evidence that the requisite consents or processes have been started, which brings into question the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment of the project and the failure to demonstrate protection of peatlands, habitats, and land use interests contravene the National Marine Plan and the National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the application's credibility.

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of substantiation regarding environmental and land use impacts render this aspect of the application incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The application fails to include any evaluation of nocturnal wildlife, which is a serious oversight. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be particularly sensitive to artificial lighting. Their behaviour, affected by phototaxis, can lead to disorientation and increased risk of collision. The lack of a lighting impact assessment or a phototaxis study means there is no understanding of how the proposed aviation lighting could affect these species or potentially increase their mortality rates.

Additionally, the application does not consider the impact of the proposed permanent red aviation lighting on visual amenity, landscape character, or the overall experience for both residents and visitors. This is particularly concerning given the significance of dark skies to the region's identity and its tourism potential, particularly in relation to astro-tourism. The introduction of lighting visible over long distances would create an intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The reliance on daytime survey data in the ornithological assessment is problematic, as

it overlooks the nocturnal activity of species such as Kittiwakes, which may forage or migrate at night. This lack of site-specific night-time data leads to a crucial gap in understanding the ecological impacts of the proposal.

Moreover, without assessing the impacts on nocturnal wildlife and dark skies, it remains impossible to establish whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate that adverse effects are unlikely cannot be satisfied. This situation invokes the precautionary principle and hinders a lawful determination of the proposal.

From a policy standpoint, this omission contradicts National Planning Framework 4, which relates to the protection of natural areas and the quality of the environment. It also detracts from the comprehensive evaluation of landscape and seascape impacts, as the character of night-time settings is an essential component of the overall environment.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates a significant failure to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application reiterates the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

There are substantial gaps in the evidential basis needed for a thorough determination. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of essential impact pathways—including nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences—raise serious concerns. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a complete understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment constitutes a significant omission. These deficiencies hinder the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4. It does not demonstrate

adequate protection for biodiversity, natural places, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal would also lead to considerable and irreversible changes to a landscape of high sensitivity. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative effects on tourism represent enduring consequences that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy inconsistencies, and unresolved environmental risks obstructs the possibility of a lawful and evidence-based decision. The competent authority should either reject the application on these grounds or employ the appropriate regulatory mechanisms to demand the submission of the missing information.

In light of these concerns, I respectfully request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

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: FAF9FFC5

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The objection stems from an analysis of the Environmental Impact Assessment Report and its supporting documents, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. This 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 heritage. Concerns arise from the scale, proximity, and design of the project, which challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Additionally, key components of the proposal remain undefined. The flexible design framework employed prevents a comprehensive understanding of potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation does not allow for a thorough understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by adequate evidence.

There are evident and substantial conflicts with policy. The proposal does not appear to comply with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. It fails to establish that national obligations for the protection of biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts are directly relevant to the statutory tests required for consent and compromise the competent authority's ability to determine that the development is acceptable from a policy perspective.

The unprecedented scale of the proposal in this area, with large turbines positioned in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and clear policy violations indicate that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must be applied.

ASSESSMENT OF ALTERNATIVES

The application significantly fails to meet the statutory requirements of the Environmental Impact Assessment regime due to an inadequate assessment of alternatives. Instead of offering a structured comparison of viable options based on environmental effects, it provides a narrative of project evolution. This method does not sufficiently demonstrate that less harmful alternatives have been identified and evaluated in favour of more damaging options.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has seriously considered positioning turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in assessing impact, and the lack of this analysis makes it impossible to conclude that the proposed siting is the least damaging available option.

The inadequacies further extend to cable routing and landfall evaluation, where there is insufficient evidence to suggest that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The failure to present a clear avoidance strategy or comparative analysis implies that mitigation by design has not been employed, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout decisions, and infrastructure routing. This oversight represents a breach of the established mitigation hierarchy and prevents the competent authority from assessing whether more suitable and less harmful alternatives are available. Without a thorough alternatives assessment, it is impossible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted lacks reliability due to significant internal inconsistencies and methodological weaknesses, which result in a failure to provide adequate evidence. The application does not meet the evidential threshold required to demonstrate that the integrity of protected sites will remain unaffected. Notably, the assessment fails to robustly evaluate the implications of displacement, collision risk, or habitat loss within key foraging areas and migratory pathways located on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline.

There exists a fundamental contradiction in the application. The developer asserts that no significant adverse effects will occur while simultaneously proposing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and the validity of its conclusions, which are not substantiated by the evidence presented.

Furthermore, the assessment does not sufficiently account for the importance of feeding grounds associated with protected sites, such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches creates uncertainty, particularly for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain inadequately understood.

The placement of turbines within a recognised migratory corridor introduces a notable risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately addressed in the application, nor are the potential effects on species with relatively small global populations considered.

In light of these deficiencies, the application stands in direct conflict with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects undermines compliance with national policy.

Collectively, these factors contribute to the conclusion that the assessment does not fulfil the statutory requirements necessary to support a determination. The standard of beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and precluding a lawful conclusion in favour of consent.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts associated with the proposed turbines is fundamentally inadequate, failing to recognise the profound scale of change and the sensitivity of the local environment. The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, which are threatened by the introduction of large-scale turbines situated near the shoreline. Such an industrial presence would significantly alter the character of the area, leading to a permanent transformation of the landscape.

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

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

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

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

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

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

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

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 is not an offshore wind development. At 5km from shore it is practically onshore. The east anglia one two and three offshore wind developments are 33 to 45km offshore. This is offshore not what is proposed for Lewis. Spot calling it offshore when it basically isn't. Please move it properly offshore.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 644571CC

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing notable deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns about the scale, proximity, and design of the project cast doubt on its adherence to statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. Furthermore, the flexible design framework employed creates ambiguity regarding potential significant effects. The reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation falls short of providing a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

There exist clear and substantial conflicts with policy. The proposal demonstrates inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to establish that national obligations aimed at safeguarding biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts directly challenge the statutory tests necessary for consent and compromise the ability of the competent authority to ascertain the development's acceptability from a policy standpoint.

The scale of this proposal is unprecedented for the area, with large turbines positioned dangerously close to the shoreline. This raises significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance highlights the application's incompleteness and its inability to facilitate a lawful determination. In light of these considerations, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application fails to meet the evidential threshold required under the Habitats Regulations, which necessitates the exclusion of adverse effects beyond reasonable scientific doubt. This situation is particularly concerning regarding protected species and sensitive habitats, invoking the precautionary principle. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, especially the mandates associated with biodiversity protection and environmental integrity. There is no assurance that impacts have been fully assessed, nor that adequate safeguards are in place.

The Environmental Impact Assessment Report is significantly inadequate and does not offer a complete, transparent, or reliable overview of the potential environmental effects linked to the proposal. By utilising a flexible Project Design Envelope without specific commitments to turbine dimensions, layouts, or configurations, a considerable degree of uncertainty is introduced. This uncertainty hinders a consistent evaluation of a worst-case scenario and ultimately compromises the integrity of the assessment. Consequently, the impacts presented may not accurately represent the development that would actually be constructed, leaving both the public and the competent authority unable to fully grasp the true extent of environmental effects.

Additionally, there are serious evidential deficiencies within the report. These include substantial gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such shortcomings result in ambiguity surrounding the scale and significance of the impacts, especially in instances where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Moreover, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans that are not yet clearly articulated. Seeking consent on the premise that any potential environmental harm will be addressed at a future stage undermines meaningful evaluation of effectiveness and assessment of residual impacts. This deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which demands that significant effects and mitigation are explicitly established prior to determination.

When combined, the reliance on an undefined design envelope, the lack of specified mitigation strategies, and the notable gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These critical deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies, which result in an incomplete and unreliable understanding of ecological receptors in the West Lewis coastal environment. This area is recognised as a sensitive and biologically active marine system, yet the baseline data remains insufficient. The methodologies employed fail to capture critical information regarding species presence, behaviour, and habitat use effectively. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable gap is evident in the treatment of otters, classified as a European Protected Species. The application does not adequately acknowledge or assess their active utilisation of coastal areas for foraging and movement. The oversight in considering their core foraging range and behavioural patterns leads to an inadequate evaluation of the potential impacts from construction disturbance, noise, and increased activity. This omission undermines any claims regarding the absence of significant effects on this species.

Additional shortcomings are present in the assessment of basking sharks, where the reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This approach is likely to underestimate their presence, especially when compared to established land-based observations that demonstrate frequent usage of these waters. By failing to incorporate or adequately consider such data, the assessment creates an incomplete baseline that further weakens the reliability of the conclusions drawn.

These methodological flaws lead to assertions of negligible or non-significant effects being based more on assumptions than on robust evidence. The lack of adequate baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises serious concerns about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced precludes any exclusion of adverse effects beyond reasonable scientific doubt, thereby activating the precautionary principle. Given these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to demonstrate to the necessary evidential standard that internationally important seabird populations on the west coast of the Isle of Lewis, which are already in decline, will not be adversely affected. The proposed development is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

A key contradiction arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only needed in scenarios where significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions presented are not backed by the underlying evidence. The assessment also lacks sufficient evidence to support the claim that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment does not adequately account for the significance of these feeding grounds, and the reliance on modelling approaches introduces uncertainty, especially for severely declining species like Kittiwakes and Fulmars. The methodologies applied are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not comprehensively understood.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment neglects the West Lewis coastline's identity as a vibrant cultural landscape where environment, language, tradition, and community intertwine. By adopting a simplistic perspective that treats heritage merely as isolated features, the application overlooks the living, social, cultural, and spiritual roles these elements play within the community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These cemeteries serve as active sites of burial and spiritual practice, yet they are misclassified as static features in the assessment. This failure to acknowledge their ongoing use and significance, along with the potential impact of development on their surroundings, results in a superficial evaluation of cultural effects and ignores their importance in community life.

Moreover, the assessment fails to consider intangible cultural heritage such as the Gaelic language, local traditions, and the community's enduring connection to the coastal environment. These elements are essential to the area's identity but are completely absent from the analysis, leading to a serious oversight. Without this consideration, it is impossible to fully grasp the cultural implications of the proposed development.

There are also pressing concerns regarding the rights and engagement of the community. The Gaelic-speaking population possesses a unique cultural identity recognised as characteristic of Indigenous Peoples. However, the process of Free, Prior and Informed Consent has not been carried out. This lack of meaningful engagement raises questions about the validity of the assessment and fails to adhere to established participation principles concerning decisions that affect cultural and environmental interests.

Additionally, a significant procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to review the social, cultural, and economic impacts on the island community, making the determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and spaces. The neglect to consider both tangible and intangible heritage, as well as the failure to recognise ongoing cultural practices, represents a clear breach of policy requirements.

The cumulative effect of failing to assess living heritage, intangible cultural values, community rights, and statutory obligations creates a substantial evidential gap. As it stands, the cultural impacts of the development have not been adequately evaluated, leaving the application lacking a sufficient basis to assess the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development fails to provide an adequate assessment of seascape, landscape, and visual impacts, which undermines the true scale of change and sensitivity of the environment in question. The character of the West Lewis coastline is marked by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The installation of large-scale turbines in close proximity to the shoreline would lead to a significant industrial presence that would fundamentally alter this character, resulting in a permanent and irreversible transformation of the landscape.

Furthermore, the application does not accurately convey the extent of visual change that would occur. The size and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. This serious level of impact has not been properly represented within the assessment, particularly given the sensitivity of the landscape.

There are also significant methodological issues concerning the choice and presentation of visual viewpoints. It appears that the selected viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This raises concerns that the true scale of visual impact may be understated, which in turn compromises the reliability of the assessment.

Moreover, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the surrounding landscape, with visual and spatial relationships to the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to acknowledge their interdependence, leading to an incomplete understanding of the impact on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their connection to the natural horizon. This constitutes not only a visual concern but a wider cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts the principles outlined in National Planning Framework 4, which emphasises the importance of safeguarding natural environments and historical assets. The scale of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any assertions of policy conformity.

Ultimately, the identified impacts are not amenable to effective mitigation. Given the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The change would thus be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment falls short in accurately portraying the scale of impact, the

sensitivity of the environment, and the interconnected relationships between landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal does not align with the need to protect this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet the assessment of construction and pollution risks is incomplete. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be prepared post-consent, which prevents any meaningful assessment of their adequacy or effectiveness.

The absence of detailed emergency response procedures exacerbates these concerns. By deferring contingency planning to a post-consent stage, the application obstructs the evaluation of whether adequate 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 point of determination.

The application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, yet it does not provide sufficient detail on how these will be prevented, controlled, or monitored. There is uncertainty regarding the scale and behaviour of sediment plumes arising from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive within the wider assessment.

The reliance on undefined future measures is particularly concerning given the sensitivity of the receiving environment. The West Lewis coastline supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Taken together, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts render the assessment materially deficient. These shortcomings prevent a robust evaluation of construction and pollution risks and further support the conclusion that the application is incomplete.

From a regulatory perspective, the deferral of critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed prior to consent, and where such information is missing, a lawful determination cannot be made. The application also fails to demonstrate compliance with policy requirements relating to environmental protection and water quality.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats can be preserved without causing substantial disruption.

A major concern arises from the flawed assumption that fishing activities can be relocated without adverse effects. The application lacks evidence showing that alternative fishing grounds are available and suitable for increased pressure. This gap in information is crucial, as displacement could lead to overfishing in other areas, which may have broader economic ramifications for the local fishing fleet. Without a well-supported assessment, understanding the effects on fisheries and local livelihoods is compromised.

Moreover, the proposal poses considerable risks to marine species, particularly from the underwater noise generated during construction. The prolonged use of high-energy hammer piling is expected to disrupt a wide area, adversely affecting marine life such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application minimises the seriousness of these effects without adequate justification.

There is a notable inconsistency in the application where the necessity for licenses to harm European Protected Species is recognised, while simultaneously portraying impacts as negligible. This contradiction weakens the credibility of the assessment and raises concerns about adherence to the Habitats Regulations, especially in situations where harm is expected to an extent that requires legal approval.

Furthermore, the assessment fails to address cumulative impacts resulting from various pressures, including habitat disruption, noise pollution, and the displacement of fishing activities. Without a comprehensive analysis of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not provide evidence of compliance with National Planning Framework 4 or the National Marine Plan. It does not demonstrate how the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, which obstructs any assertion that the proposal aligns with sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project fails to adequately evaluate the onshore infrastructure, resulting in an incomplete understanding of the overall impacts of what is essentially a single integrated project. The separate assessments of the offshore turbines and onshore works lead to a fragmented approach that obscures the actual scale of the environmental and socio-economic consequences.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. These activities involve excavation in deep peat areas, notably within Barvas Moor, which is a crucial carbon store and an ecologically sensitive environment. Without a comprehensive assessment of these impacts, the application falls short of providing a clear picture of the project's environmental footprint.

By failing to assess the onshore impacts fully or deferring such evaluations, the application hinders an accurate assessment of cumulative effects. It is essential for the Environmental Impact Assessment process to consider all components of a project in conjunction; however, the distinct treatment of offshore and onshore elements leaves the combined impacts on peatlands, habitats, and communities inadequately understood.

There are also considerable risks to sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The lack of demonstrated assessment of impacts on these habitats, along with the absence of appropriate avoidance measures, creates a significant evidential gap concerning biodiversity protection.

The proposal raises serious concerns about carbon balance, as disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently address this matter or prove that the overall carbon balance remains positive.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, leading to uncertainties about the deliverability and lawful implementation of the project.

From a policy standpoint, the lack of comprehensive assessment of the project as a whole, along with the failure to demonstrate 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.

Overall, the separation of project components, the absence of thorough assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and untrustworthy, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The failure to assess dark skies and nocturnal wildlife represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will create a pervasive "wall of light" effect across the western horizon, fundamentally transforming the night-time environment.

Moreover, the application lacks an evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. Given the integral role of dark skies in the area's identity and in emerging sectors like astro-tourism, this omission is particularly concerning. The absence of such assessments creates a clear gap in the overall landscape and environmental evaluation.

Equally troubling is the lack of analysis regarding impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased collision risk. The application does not include any assessment of lighting impacts or phototaxis studies, resulting in a failure to understand how aviation lighting may affect these species or contribute to increased mortality.

This issue is exacerbated by the dependence on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a critical shortfall in understanding the ecological impacts.

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

From a policy standpoint, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. They also diminish the overall assessment of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

In summary, the absence of any assessment pertaining to dark skies and nocturnal wildlife signifies a considerable evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of facilitating a lawful determination.

TOURISM

The application presents a concerning inadequacy in assessing tourism impacts, neglecting to consider the economic and social repercussions for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are essential to tourism, which is heavily reliant on these natural attributes. Although it is noted that 86% of visitors are attracted by the scenery, there is no quantitative assessment on how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism has experienced notable growth, rising from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, making up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and the degradation of environmental quality could affect the Tourism Gross Value Added or the broader economic resilience. In the absence of such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or harm an established and flourishing sector.

Furthermore, the assessment disregards the critical role of environmental quality in sustaining tourism, especially the significance of unspoiled landscapes and dark skies to visitor experience, alongside emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a significant gap in understanding the impacts on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and acknowledging the island's economic dependency lead to a significant gap in evidence. This hinders a thorough evaluation of economic effects and supports the view that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings regarding sustainable development, as assessed against statutory obligations, national policies, and evidential standards. This proposal mirrors the issues that resulted in the refusal of the Lewis Wind Power application in 2008, when

the scale of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it fails to address these crucial aspects adequately.

There are substantial gaps in the evidential basis required for a thorough determination of the application. Key areas such as baseline data, the ambiguous design envelope, unspecified mitigation measures, and the exclusion of critical impact pathways—including nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects—are notably lacking. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects and residual impacts associated with the proposal.

Additionally, procedural deficiencies are evident. The omission of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment is a significant oversight. These inadequacies obstruct the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In direct violation of National Planning Framework 4, the proposal fails to demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. There is no evidence that health and wellbeing impacts are acceptable, nor is there a demonstrated net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore components have not been sufficiently evaluated, clouding the understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks persist and may be significant. The evaluations concerning 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 remains unmet, thereby activating the precautionary principle and preventing a lawful conclusion regarding the acceptability of the impacts.

Moreover, 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, and the disruption of cultural and visual relationships, alongside tourism impacts, signify permanent effects that cannot be mitigated adequately.

When considering all these factors, the application proves to be procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, 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 appropriate regulatory provisions to compel the submission of the necessary 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: C21FCACB

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 is submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is informed by a review of the Environmental Impact Assessment Report along with the supporting documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and rich cultural identity, and concerns regarding its scale, proximity, and design raise important questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for lawful determination, with critical environmental data missing and baseline information being limited and inconsistent. Additionally, many key aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, and the absence of specified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

Moreover, there are notable policy inconsistencies 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 directly affect the statutory tests necessary for consent and hinder the competent authority's ability to determine whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises substantial 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 should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents a number of serious deficiencies that collectively undermine its validity. The reliance on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This lack of clarity obstructs the ability to apply a worst-case scenario consistently, thereby compromising the integrity of the Environmental Impact Assessment Report. As a result, the environmental impacts outlined may not accurately reflect those of the final development, depriving both the public and the competent authority of a proper understanding of potential environmental effects.

Moreover, the application is overly dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the assumption that environmental harm will be managed later is inappropriate, as it precludes a meaningful evaluation of these measures' effectiveness or the assessment of any residual impacts. This deferral of critical information to post-consent stages contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be established prior to determination.

Significantly, there are notable evidential gaps, including a lack of comprehensive baseline data and methodological limitations, along with a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the magnitude and significance of impacts. The presentation of conclusions asserting negligible or non-significant effects without robust supporting data further obscures understanding. The lack of sufficient information hinders clarity on cumulative and worst-case impacts, introducing a level of scientific uncertainty that is inconsistent with statutory requirements.

As a result, the application does not meet the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to satisfy the requirements of National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity. The inability to demonstrate that impacts have been fully assessed or that appropriate safeguards exist is evident.

In conclusion, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These critical deficiencies prevent a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is highly sensitive and biologically active. However, the assessment of marine ecology and protected species fails to provide a complete and reliable understanding of ecological receptors in this area. The baseline

data is incomplete, and the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not offer a sound evidential basis for evaluating potential impacts.

One significant oversight involves otters, a European Protected Species. The application does not properly recognise and assess their use of coastal areas for foraging and movement. This neglect of their core foraging range and behavioural patterns results in inadequate consideration of the potential effects of construction disturbance, noise, and increased activity. Such deficiencies undermine any conclusions about the absence of significant effects on otters.

In assessing basking sharks, the application relies on aerial surveys, which introduce significant detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence, particularly when compared to established land-based observations showing frequent usage of these waters. The failure to incorporate relevant data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

Methodological shortcomings mean that conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hinders meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to identify or assess protected species adequately. This level of uncertainty prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, containing significant gaps and inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are within the development site, yet the assessment fails to adequately evaluate the risks associated with displacement, collision, or habitat loss.

There is a critical contradiction in the application. The developer claims there are no

significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only applicable where significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment, indicating that the conclusions drawn are not firmly supported by the evidence.

The assessment lacks sufficient evidence to show that seabirds connected 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 reliance on modelling approaches introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. Methodologies used are likely to underestimate mortality, particularly given the incomplete baseline data and limited understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional risk by creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not adequately consider the long-term implications of potential sustained mortality in this corridor or the effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and modelling shortcomings, means that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle, which prevents a lawful conclusion supporting consent.

The identified deficiencies also indicate non-compliance 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 be adversely affected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, reveals a critical deficiency in the assessment process. These locations serve as active places of burial and spiritual practice, yet they are mischaracterised as static features. This oversight neglects their ongoing use and meaning, as well as the impact of development on their setting, leading to an incomplete evaluation of cultural effects and a disregard for their role in community life.

Furthermore, the assessment fails to address intangible cultural heritage, including the Gaelic language, 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 evaluation, representing a significant gap. Without acknowledging these factors, the true cultural impact of the development remains obscured.

Additionally, there are serious concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity with recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and disregards established principles of participation in decisions that affect cultural and environmental interests.

The assessment further suffers from a critical procedural failure, as it does not include a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment hinders 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 deficiencies directly contravene the National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, signifies a clear departure from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development have not been properly evaluated, leaving the application without a solid foundation for understanding the true cultural cost it entails.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal currently under consideration has significant deficiencies concerning the assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made public. This lack of transparency results in a considerable evidential gap, which hinders both public understanding and the competent authority's ability to comprehend the full extent of social risks identified in the developer's own research.

Summaries that are available suggest that residents are already experiencing measurable 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 are thus grounded in evidence rather than speculation. Nevertheless, the failure to disclose the complete assessment limits the opportunity for proper scrutiny of the findings and restricts the determination of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with findings from the developer identifying “cultural loss.” Despite this, these significant impacts have not been adequately integrated into the main application or assigned appropriate weight. Consequently, the withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. The failure to provide the full dataset means the application does not offer a comprehensive evidential basis for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are required to support positive health outcomes and mitigate harm, yet the available evidence points to existing adverse effects that remain undisclosed. Without access to the full assessment, it is impossible to demonstrate compliance with this policy.

The procedural implications are considerable. The competent authority cannot perform a robust socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material flaw within the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines near the West Lewis coastline presents significant deficiencies in its assessment of seascape, landscape, and visual impacts. The open Atlantic horizon, undeveloped character, and strong remoteness of this area are fundamental aspects that would be irreversibly altered by the introduction of an industrial presence. The application fails to accurately reflect the magnitude of the visual change that would arise, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby eroding the naturalness and remoteness that currently define this landscape.

Concerns also arise from the methodology employed in selecting and presenting visual viewpoints. There is evidence that these viewpoints may not adequately capture the perspectives of the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the assessment underestimates the magnitude of visual impact, compromising its overall reliability.

Moreover, the interconnectedness between landscape, seascape, and cultural heritage has not been properly assessed. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that connects visually and spatially to the Atlantic horizon. The assessment treats these sites in isolation, failing to acknowledge their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any assertion of compliance with relevant policies.

Ultimately, the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Thus, the changes to the landscape are fundamental and permanent, rather than something that can be lessened to an acceptable level through mitigation.

In summary, the assessment fails to convey the true scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. These shortcomings preclude a reliable evaluation and firmly establish that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail for a thorough assessment of construction and pollution risks, which is critical for evaluating potential environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on future mitigation and contingency measures that are to be developed post-consent, inhibiting a meaningful assessment of their effectiveness or adequacy.

This reliance on unspecified future measures is particularly alarming, given the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and essential habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to offer sufficient detail

regarding prevention, control, or monitoring measures.

Moreover, there is ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these effects. This uncertainty also encompasses potential consequences for marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards exist to address pollution events. This introduces procedural risks and diminishes the competent authority's ability to assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the deferral of vital environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and the corresponding mitigation measures must be evaluated before consent, and the absence of such critical information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of the impacts on fisheries and marine life, failing to provide a comprehensive evaluation of both ecological and socio-economic factors. The waters off the West Lewis coast are home to a diverse marine ecosystem and a vital fishing industry, yet the proposal does not adequately protect or maintain these essential uses and habitats from significant disruption.

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

The proposal further jeopardises marine species, especially due to the underwater noise associated with construction activities. Prolonged high-energy hammer piling is

expected to disturb marine life over considerable distances, particularly impacting species like dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is concerning; however, the application downplays these effects, lacking adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project fails to adequately address the interconnected nature of its components, specifically the offshore turbines and the associated onshore infrastructure. This fragmented approach obscures the full extent of environmental and socio-economic impacts, as the various elements of the project are not evaluated collectively. The implications of this incomplete assessment extend to significant onshore works, which involve cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through ecologically sensitive areas. These activities require excavation in regions of deep peat, notably within Barvas Moor, which is a crucial carbon store and habitat of considerable ecological significance.

Furthermore, by omitting or postponing the evaluation of these onshore impacts, the application undermines the assessment of cumulative effects. The Environmental Impact Assessment mandates a holistic consideration of all project components; however, the current division between offshore and onshore assessments fails to reveal the combined repercussions on peatlands, ecosystems, and local communities.

There are pressing concerns regarding sensitive habitats, including machair systems and peatland environments, that are recognised in policy protections. The application does not sufficiently demonstrate that these habitats have been thoroughly assessed or that adequate avoidance measures have been implemented, highlighting a significant gap in evidence related to biodiversity protection.

In addition, the routing of infrastructure through active croft land raises potential conflicts with established land uses and legal rights. The application lacks substantiating evidence that the necessary consents or protocols have been pursued, which raises serious doubts about the project's deliverability and legal compliance.

From a policy standpoint, the failure to evaluate the project comprehensively, along with the inability to ensure the protection of peatlands and habitats, is in direct conflict with the National Marine Plan and National Planning Framework 4. The lack of demonstrable measures for avoiding or mitigating impacts further weakens the application.

Overall, the separation of project elements, the absence of thorough assessments, and the insufficient evidence regarding environmental and land use impacts render this section of the application fundamentally incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline features exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism potential. However, the proposal introduces permanent red aviation lighting that will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This significant change has not been evaluated in the Environmental Impact Assessment, which fails to consider the effects of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. Such omissions are particularly concerning given the area's reliance on dark skies, especially for emerging tourism sectors like astro-tourism.

Moreover, the lack of evaluation regarding impacts on nocturnal wildlife is alarming. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and a higher risk of collisions. The application does not provide a lighting impact assessment or a study of phototaxis, thus neglecting to address the potential effects of aviation lighting on these species and the risk of increased mortality.

Additionally, the ornithological assessment is primarily based on daytime survey data, failing to account for nocturnal activity and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, but this risk has not been assessed either. The absence of site-specific night-time data leaves a critical gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing a lawful determination. Furthermore, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality, while also compromising the broader evaluation of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

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.

TOURISM

The Isle of Lewis sees tourism as a critical component of its economy, with the sector having expanded from £65 million in 2017 to over £81.5 million, providing more than 1,000 jobs and constituting up to 16% of the local economy. Despite the significance of this industry, the assessment of tourism impacts within the application is inadequate, particularly regarding the social and economic consequences for this key sector. It is noted that 86% of visitors are attracted by the area's scenic beauty, yet there is no quantifiable analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or their overall economic contributions.

Furthermore, the assessment overlooks the crucial relationship between environmental quality and tourism, disregarding how unspoiled landscapes and dark skies enhance visitor experiences and appeal to growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortfall, creating a substantial gap in understanding the impacts on an increasingly important segment of the local economy.

The implications of this oversight are considerable, especially for an island community that relies heavily on tourism due to limited economic diversification. The failure to evaluate tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. Notably, the absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been properly assessed, as mandated under the Islands (Scotland) Act 2018.

On a policy level, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the requirement for a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposed development.

The cumulative effect of not quantifying tourism impacts, neglecting the environmental factors that influence visitor behaviour, and overlooking the island's economic dependency results in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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.

Additional Comments

Why are the Scottish Government imposing more of these monstrosities when they are not required. We already produce more wind power than the grid can accept and it is costing an extortionate amount of money paid to companies to switch off. Apart from the fact that the grid as it stands is not compatible with wind connection, I refer to the Spanish blackout and the physicality of how the grid actually works. The environmental destruction of natural carbon capture, peatlands and trees. The destruction and disruption of our natural heritage, our bird life, our mammals, our animals. The total disregard for our local communities, their health and wellbeing. All for the sake of being the no country for renewables, which will make no difference to climate change whilst the big economies in the world are ignoring everything except making money. How are these monstrosities going to be disposed of at end of life? Where are they being manufactured and what goes into the manufacture of them. I refer to cobalt and copper mining using slave and child labour, oh it is not in our country so it doesn't count. The same goes for wave power and battery storage. "Green energy" I don't think so. There are other alternatives but these are met with a stone wall.

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: 751124E7

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies related to planning, environmental impacts, cultural heritage, and procedural integrity.

The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The scale and design of the project, particularly the placement of large turbines in close proximity to the shoreline, raise serious concerns about landscape capacity, visual impact, and overall environmental consequences.

Fundamental flaws are evident in the application, as it lacks an adequate evidential foundation necessary for a lawful determination. There is a noticeable absence of critical environmental data, with limited and inconsistent baseline information, while key elements of the project remain undefined. The flexible design framework utilised impedes a clear assessment of the likely significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a thorough understanding of potential environmental, cultural, and community impacts, rendering claims of negligible effects unsubstantiated by robust evidence.

Moreover, the proposal presents clear and substantial conflicts with established policies. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. These policy conflicts directly impact the statutory tests for consent and undermine the competent authority's capacity to deem the development acceptable from a policy standpoint.

In light of the unprecedented scale of this proposal in its specific location and the various evidential weaknesses present, it is clear that the application is incomplete and unable to support a lawful determination. Therefore, the precautionary principle must be applied in this context.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in its assessment of marine ecology and protected species, leading to an inadequate understanding of ecological receptors within the West Lewis coastal environment. This area is characterised by high sensitivity and biological activity. However, the baseline data is incomplete, and the

methodologies used do not sufficiently capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

A notable gap in the assessment pertains to otters, a European Protected Species. The application does not adequately recognise or evaluate their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns means that the potential impacts from construction disturbance, noise, and increased activity have not been properly assessed, thereby undermining conclusions regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is flawed, with a reliance on aerial surveys leading to significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that indicate frequent use of these waters. By not incorporating or appropriately considering such data, the assessment presents an incomplete baseline, diminishing the reliability of the conclusions.

The methodological limitations highlighted imply that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. Without sufficient baseline data, meaningful assessments of cumulative and indirect impacts are not achievable, which includes consideration of seasonal variations and wider ecosystem interactions. This uncertainty raises questions about the true scale of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The development is situated within critical foraging areas and migratory routes on the west coast of the Isle of Lewis, which is known to host internationally significant seabird populations. These populations are already facing declines, and the application does not adequately prove that these species will not suffer adverse effects. The ornithological assessment presented contains significant gaps and internal inconsistencies, undermining its conclusions. It fails to thoroughly evaluate the

potential risks associated with displacement, collision, and habitat loss for these birds.

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

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

From a regulatory standpoint, the application does not meet the necessary evidential standard to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, combined with gaps in data and limitations in modelling, indicates that the threshold of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and precludes a lawful conclusion that would support consent. Additionally, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy.

Overall, the assessment is rendered unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These deficiencies impede a thorough evaluation of the potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment neglects to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically linked. It adopts a simplistic approach, viewing heritage merely as a collection of isolated, static assets, rather than acknowledging their dynamic social, cultural, and spiritual roles within the community.

Key culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas

are treated inadequately. These active places of burial and spiritual practice are mischaracterised as static features, without consideration of their ongoing use and significance, nor the development's impact on their setting. This oversight leads to an incomplete evaluation of cultural effects and overlooks their importance in community life.

Moreover, the assessment fails to address intangible cultural heritage, including the Gaelic language, traditions, and the community's deep-rooted connection to the coastal environment. These crucial elements of local identity are conspicuously absent from the evaluation, highlighting a significant deficiency. Without their inclusion, the cultural implications of the development remain poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the legitimacy of the assessment and disregards established principles of participation in matters affecting cultural and environmental interests.

A critical procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment precludes the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, undermining lawful determination.

From a policy standpoint, these inadequacies directly contradict the National Planning Framework 4, particularly regarding the protection of historic assets and places. The omission of both tangible and intangible heritage and the failure to acknowledge living cultural practices signify a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately assessed, leaving the application without a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a significant concern. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been made available. This lack of access creates a substantial evidential gap, which hinders the public and the competent authority from fully grasping the range of social risks identified through the developer's own research.

Reports indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These observations stem from direct engagement with the community and are not speculative

in nature. The decision to withhold the full assessment restricts meaningful scrutiny of the findings and limits the ability to gauge their significance within the decision-making framework.

Furthermore, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Nonetheless, these impacts have not been thoroughly incorporated into the main application nor given the appropriate weight they deserve. The absence of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This deficiency in transparency has implications for 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 complete dataset, the application lacks a solid evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application does not adequately demonstrate alignment with the National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm. However, existing evidence points to adverse effects that have not been fully disclosed. Without access to the complete assessment, it is impossible to establish compliance with this policy.

The procedural consequences are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This gap represents a significant omission in the application and signifies a failure to satisfy the evidential requirements dictated by the Environmental Impact Assessment regime.

In conclusion, the withholding of the complete Social Impact Assessment, coupled with evidence of current adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to support its case.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the potential impacts on seascape, landscape, and visual quality is significantly inadequate and does not sufficiently account for the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unobstructed Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed large-scale turbines situated near the shoreline would introduce a continuous and dominant industrial feature, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

There is a clear lack of representation regarding the magnitude of visual change within the application. The considerable scale and close proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, which would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately convey the level of this impact or its significance, particularly within a landscape that is as sensitive as this one.

Methodological issues arise concerning the choice and presentation of visual viewpoints. Evidence indicates that the viewpoints selected may not accurately reflect the most sensitive receptors or the worst-case scenarios, especially concerning important cultural heritage sites and landscapes of high value. This leads to the risk that the extent of visual impact has been understated, compromising the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Key sites, including the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape framework interconnected through visual and spatial relationships with the Atlantic horizon. The assessment regards these as isolated entities rather than acknowledging their interdependence, resulting in a fragmented understanding of the impacts on their settings and cultural importance.

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

From a policy standpoint, the proposal directly contravenes National Planning Framework 4 concerning the safeguarding of natural environments and historic assets. The magnitude of the proposed changes does not align with the necessity to protect landscape character, visual amenity, and the settings of culturally important sites. The absence of a thorough worst-case scenario analysis further undermines any assertion of policy compliance.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelmingly dominant and inescapable. Therefore, the resulting change is fundamental and permanent, rather than being amenable to reduction through mitigation measures.

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the intertwined nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is inconsistent with the protection of this landscape.

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 proposed project involves both offshore turbines and extensive onshore works, which are closely interconnected yet assessed independently. This separation leads to a fragmented evaluation that fails to reveal the overall environmental and socio-economic consequences of what is fundamentally a single integrated project. The onshore components consist of cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure across sensitive landscapes. Excavation across areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat, is a crucial concern. However, the application does not offer a thorough assessment of these impacts, thus obscuring the project's total environmental footprint.

The lack of comprehensive assessment extends to the cumulative effects of the project. By excluding or deferring the evaluation of onshore impacts, the application hinders a proper understanding of the combined effects on peatlands, habitats, and local communities. The Environmental Impact Assessment process mandates that all elements of a project be considered together. Nonetheless, the disjointed approach to assessing offshore and onshore components means the full extent of impacts on sensitive habitats, such as machair systems and peatland environments, remains unclear. These habitats are under policy protection, yet the application fails to demonstrate that their impacts have been fully evaluated or that suitable avoidance measures are in place, leaving a significant evidential gap regarding biodiversity protection.

Moreover, the proposal raises urgent concerns about carbon balance. Disturbing peatland not only releases stored carbon but may also result in a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this critical issue and does not prove that the overall carbon balance remains favourable.

The routing of infrastructure through active croft land introduces further complications, creating potential conflicts with existing land use and legal rights. The application lacks sufficient evidence that the necessary consents or processes have been initiated, which raises serious doubts regarding both deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project as a complete entity and to show the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The application's inability to demonstrate that impacts can be avoided or mitigated further undermines its credibility.

Overall, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application not only incomplete but also unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment for the proposal fails to address the assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is noted for its exceptionally dark skies, contributing to the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, which would be visible over long distances, risks creating a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application lacks any evaluation of the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. This absence is particularly important given the significance of dark skies to the area's identity and its potential for sectors such as astro-tourism. Consequently, this results in a distinct gap in the overall landscape and environmental assessment.

Moreover, there has been no evaluation of the impacts on nocturnal wildlife. Sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel may be adversely affected by artificial lighting due to phototaxis, which can lead to disorientation and increased risk of collision. The application does not include an assessment of lighting impacts or a phototaxis study, failing to consider how aviation lighting may impact these species and increase mortality rates.

The reliance on daytime survey data within the ornithological assessment compounds this issue, as it does not account for nocturnal activities or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data presents a critical gap in understanding ecological impacts.

Without a thorough 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, necessitating engagement with the precautionary principle and preventing a lawful determination.

From a policy standpoint, this omission is inconsistent with the National Planning Framework 4 regarding the protection of natural places and environmental quality. It undermines the broader assessment of landscape and seascape impacts, as the character of night-time environments is an integral aspect of the overall ecosystem.

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

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: 579B25CF

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 based on a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the proposal's scale, proximity, and design, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Substantial conflicts with policy are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development as policy-compliant.

The unprecedented scale of the proposal raises significant concerns, with large turbines planned in close proximity to the shoreline, leading to issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In this context, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed, relying on an Environmental Impact Assessment Report that is materially deficient and fails to present a comprehensive, transparent, or trustworthy account of the potential environmental effects of the proposal. The employment of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This lack of specificity undermines the assessment's integrity, meaning that the impacts outlined may not accurately represent the final development, thus obscuring the true extent of environmental effects from both the public and the competent authority.

Moreover, the application's reliance on undefined mitigation measures, monitoring strategies, and management plans compromises the ability to evaluate their effectiveness or the residual impacts meaningfully. Seeking consent under these circumstances, where environmental harm will supposedly be addressed later, is procedurally unacceptable. This approach contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant likely effects and their mitigation be clearly delineated before determination.

Evidential deficiencies further compound the shortcomings of the proposal, highlighted by notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such weaknesses foster uncertainty regarding the scale and significance of impacts, especially when conclusions suggest negligible or non-significant effects without robust supporting data. Insufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it does not provide assurance that impacts have been comprehensively assessed or that adequate safeguards exist.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a proper assessment of alternatives, which is required by the Environmental Impact Assessment regime. Instead of presenting a structured comparison of realistic alternatives based on their environmental effects, it offers a narrative of project development. This method does not show that less harmful options have been adequately identified, assessed, or chosen over more damaging ones.

There is a lack of clear, evidence-based comparisons of different offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has adequately considered placing turbines further offshore, where impacts on visual, ecological, and coastal aspects would likely be less severe. Given the sensitivity of the West Lewis coastline and the importance of proximity to the shore in evaluating impact, the failure to include this analysis prevents any conclusion that the proposed siting is the least damaging option.

The problems also extend to the cable routing and landfall assessment. There is insufficient evidence that alternative routes have been explored to avoid or lessen impacts on sensitive areas, including cultural and spiritual sites like Barvas Cemetery. The lack of a clear strategy to avoid impacts and the absence of comparative analysis imply that mitigation through design has not been effectively applied. Instead, the reliance appears to be on measures taken after design.

Consequently, the application does not demonstrate that environmental harm has been reduced through careful site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to determine if less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is sustainable or aligns with policy requirements.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the overall conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is inadequate and does not deliver a thorough or trustworthy understanding of the ecological receptors in the West Lewis coastal area. This marine environment is sensitive and biologically rich. However, the baseline data is lacking, and the methodologies employed do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment fails to provide a strong evidential basis for evaluating potential impacts.

One significant oversight is the treatment of otters, a species protected under European law. The application does not adequately acknowledge or assess their active use of the coastal areas for foraging and movement. This absence of consideration regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbances, noise, and increased human activity have not been sufficiently evaluated. This flaw undermines any assertions about the absence of significant effects on otters.

Deficiencies also appear in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, which is likely to lead to an underestimation of their presence. This is particularly evident when compared to well-established land-based observations that highlight frequent use of these waters. The neglect to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual risks to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment process and the National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced means that it cannot be confidently claimed that adverse effects are excluded beyond reasonable scientific doubt, which invokes the precautionary principle. Thus, consent cannot be lawfully granted in these circumstances.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with this application is fundamentally flawed, revealing significant gaps in evidence and internal contradictions that weaken its conclusions. The assessment fails to adequately demonstrate that the 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 by the proposed development. Key foraging areas and migratory pathways are located within the development site, yet the implications of displacement, collision risk, and habitat loss are not robustly evaluated.

A notable inconsistency arises within the application, where the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and highlights that the presented conclusions lack support from the underlying evidence. Furthermore, the assessment inadequately addresses the potential impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches

introduces uncertainty, particularly for species facing severe decline, like Kittiwakes and Fulmars. The methodologies employed are prone to underestimating mortality rates, especially when baseline data is incomplete and behavioural responses are not thoroughly understood.

The placement of turbines within a recognised migratory corridor adds further risk, effectively obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term consequences of ongoing mortality within this corridor or the potential repercussions for species with relatively small global populations. From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

Additionally, the identified deficiencies signify a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the conservation of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. Such deficiencies prevent a thorough evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding the cultural heritage and community identity of the West Lewis coastline is fundamentally deficient. It fails to recognise this area as a living cultural landscape where the environment, language, tradition, and community are intricately connected. The application adopts a simplistic view, treating heritage merely as isolated and static assets, rather than appreciating their ongoing social, cultural, and spiritual significance within the community.

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

Additionally, the assessment does not consider intangible cultural heritage, such as the Gaelic language and traditions, nor the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity and are completely overlooked, which constitutes a significant omission. Without taking these

factors into account, the cultural impact of the proposed development cannot be accurately gauged.

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

Moreover, a critical procedural failure is the omission of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority's ability to fulfil its legal duty to evaluate the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside living cultural practices, clearly deviates from established policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding social impacts, health, and wellbeing, as the assessment currently lacks the necessary transparency for a lawful evaluation. 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 access creates an important evidential gap, inhibiting both public understanding and the competent authority's ability to assess the identified social risks based on the developer's own research.

Local residents have reported measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore concrete rather than speculative. However, the omission of the full assessment hampers proper scrutiny of the findings and limits the determination of their significance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with the concept of "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, the impacts related to community cohesion have not been adequately incorporated into the main application or given the appropriate

consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when they may affect community character and functioning. By failing to provide the complete dataset, the application does not offer a solid evidential foundation for weighing benefits against harms.

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

The procedural implications of this situation are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This omission constitutes a significant gap in the application and does not meet the evidential requirements established by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of ongoing adverse impacts, results in an incomplete and unreliable assessment. This scenario impedes a lawful determination and highlights the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts lacks comprehensiveness and does not fully capture the extent of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed large-scale turbines near the shoreline would introduce a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

The application fails to accurately depict the scale of visual change. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would negatively affect visual amenity and diminish the defining qualities of naturalness and remoteness. The assessment does not effectively convey the significance of these impacts within such a sensitive landscape.

Methodological issues arise regarding the chosen visual viewpoints. There is evidence that the viewpoints may not represent the most sensitive receptors or extreme scenarios, particularly concerning important cultural heritage sites and valuable

landscapes. This raises concerns that the visual impact may have been underestimated, compromising the assessment's reliability.

Additionally, the assessment does not account for the interconnectedness of landscape, seascape, and cultural heritage. Notably, sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape connected visually and spatially to the Atlantic horizon. Treating these sites as separate entities ignores their interdependence and results in an inadequate analysis of the impacts on their cultural significance and setting.

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

From a policy standpoint, the proposal contradicts the National Planning Framework 4, particularly in terms of protecting natural areas and historical assets. The magnitude of change is at odds with the need to preserve landscape character, visual amenity, and the contexts of culturally important sites. The lack of a thorough worst-case scenario assessment further weakens any claims of adherence to policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, unable to be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents serious deficiencies in the assessment of construction and pollution risks, which are crucial for understanding potential environmental impacts. It entails significant seabed preparation and installation activities within the dynamic Atlantic environment, yet lacks comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed post-consent, thereby obstructing a thorough evaluation of their effectiveness and sufficiency.

This dependence on future, undefined measures is particularly alarming due to the sensitivity of the local environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to disturbance and contamination from sediment. While the application acknowledges the risks associated with sediment mobilisation and possible chemical or oil spills, it fails to provide adequate information on preventative, controlling, or monitoring strategies.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of rigorous modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on sensitive marine species and habitats identified in the broader assessment.

Furthermore, the lack of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent is granted, the application inhibits an evaluation of whether sufficient safeguards exist to manage pollution incidents. This presents procedural risks and compromises the capacity of the competent authority to properly assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the principles set forth in the Environmental Impact Assessment regime. Significant effects and required mitigation must be thoroughly assessed prior to consent; the absence of such information renders a lawful determination unattainable. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Collectively, the lack of defined mitigation measures, insufficient management plans, and uncertainties about potential impacts render the assessment fundamentally inadequate. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a thorough evaluation of ecological and socio-economic impacts related to fisheries and marine life. Off the West Lewis coast, there exists both a diverse marine ecosystem and a functioning fishing industry. However, the proposal does not adequately demonstrate how these essential habitats and activities will be protected or maintained without significant disruption.

One of the critical flaws in the application is the assumption that fishing activity can be relocated without consequences. There is no evidence provided to suggest that alternative fishing grounds exist, are accessible, or can support the additional pressure that would result from such displacement. This oversight is crucial, as it poses a risk of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. Without a comprehensive and evidence-based assessment, the implications for fisheries and the livelihoods they support remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling over an extended duration is expected to create disturbances across significant distances, potentially impacting species such as dolphins. The anticipated disturbance

to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application diminishes the importance of these effects and fails to provide adequate supporting evidence.

In the application, there is an evident inconsistency regarding the need for licences to permit harm to European Protected Species while simultaneously describing potential impacts as negligible. This contradiction calls into question the validity of the assessment and raises issues of compliance with the Habitats Regulations, especially where harm is expected to occur at a level that requires legal authorisation.

Additionally, the assessment does not account for cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is necessary 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 and the National Marine Plan. It does not establish that the proposed development can coexist with existing marine users or avoid unacceptable effects on marine biodiversity, which hinders any conclusion regarding the sustainability of the proposal.

Overall, the absence of evidence concerning fishing displacement, the minimisation of acoustic impacts, and the internal contradictions present in the application render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

By not addressing onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively, yet the division between offshore and onshore components means the overall effects on peatlands, habitats, and communities remain unclear.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that is visible over long distances, which would create a continuous “wall of light” effect across the western horizon. This lighting would fundamentally alter the night-time environment along the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are a critical aspect of the area’s environmental quality, cultural identity, and tourism value, making the lack of assessment regarding their impact a significant oversight in the Environmental Impact Assessment.

The application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the growing interest in sectors such as astro-tourism, which rely heavily on the preservation of dark skies. The absence of such an assessment creates a notable gap in the overall landscape and environmental evaluation.

Moreover, there is no consideration of the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and increased risks of collision. The application does not incorporate any lighting impact assessment or phototaxis study, and consequently, it fails to address how aviation lighting might affect these vulnerable species or escalate mortality rates.

This deficiency is further exacerbated by the dependence on daytime survey data within the ornithological assessment, which does not account for nocturnal activities or the associated risks. For example, Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting; however, this potential impact has not been evaluated. The lack of site-specific night-time data results in a critical shortcoming in understanding the ecological consequences.

Without an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to confidently rule out negative consequences cannot be achieved, thus invoking the precautionary principle and hindering a lawful determination of the application.

From a policy standpoint, this omission is at odds with National Planning Framework 4, which advocates for the protection of natural environments and the quality of the landscape. Furthermore, it undermines the broader evaluation of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the overall ecology.

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

TOURISM

The assessment of tourism impacts lacks essential evaluation, overlooking the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's unspoilt landscapes, wild coastline, dark skies, and overall sense of remoteness. Although the application states that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might alter visitor numbers, behaviour, or their overall economic contribution.

Since 2017, tourism has seen notable growth, rising from £65 million to over £81.5 million and supporting more than 1,000 jobs while constituting up to 16% of the island's economy. However, the application does not assess how the industrialisation of the seascape and the subsequent loss of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in attracting tourists, including the role of unspoiled landscapes and dark skies in enhancing visitor experiences. This is particularly relevant for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment

exacerbates this oversight, creating a significant gap in understanding the effects on a recognised and developing facet of the local economy.

Given the context of an island community with limited economic diversification, the neglect to evaluate tourism impacts carries broader implications for employment opportunities, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been examined as stipulated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately illustrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to demonstrate net benefit. It also stands in conflict with strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence to enable the competent authority to assess the economic ramifications of the proposal.

In summary, the cumulative failure to quantify tourism impacts, evaluate the environmental factors that influence visitor behaviour, and acknowledge the island's economic reliance culminates in a substantial evidential gap. This deficiency hampers a thorough evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises serious concerns about its alignment with sustainable development principles as outlined in statutory duties, national policy, and evidential standards. It mirrors the issues that led to the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Despite being presented within a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal falls short.

Critical gaps in baseline data undermine the evidential basis for decision-making. The reliance on an undefined design envelope, unspecified mitigation measures, and the failure to consider significant impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects leave the Environmental Impact Assessment incomplete. This lack of thoroughness prevents an understanding of likely significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The failure to conduct a compliant Island Communities Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment is a material omission. These deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

The proposal directly contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to

establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, masking impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals, along with internal inconsistencies, indicate that the evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thereby 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, the disruption of cultural and visual relationships, and the negative impacts on tourism represent permanent consequences that cannot be effectively mitigated.

In conclusion, the application is fundamentally unfit for determination, both procedurally and substantively. The significant information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application is refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 675C67A8

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. Concerns arise from a review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity.

The unprecedented scale of the proposal, with large turbines sited close to the shoreline, raises alarm over landscape capacity, visual impact, and broader environmental implications. The application does not provide a sound evidential basis for a lawful determination, as it lacks critical environmental data, and baseline information is both limited and inconsistent. Additionally, important aspects of the proposal remain undefined. The flexible design framework employed prevents a comprehensive understanding of potential significant effects, while unverified mitigation measures hinder the ability to evaluate their efficacy. Consequently, the supporting documents fail to facilitate a full understanding of the environmental, cultural, and community impacts, rendering claims of negligible or non-significant effects unsupported by solid evidence.

Moreover, the application presents clear conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal does not prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts are directly relevant to the statutory tests required for consent and compromise the competent authority's ability to determine the proposal's acceptability in policy terms.

In light of the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance, it is clear that the application is incomplete and fails to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the proposed development's environmental effects. A flexible Project Design Envelope, lacking specific turbine

dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty undermines the assessment's integrity, making it impossible to ascertain a worst-case scenario, thereby hindering both public understanding and the competent authority's evaluation of the true environmental impacts.

Furthermore, the application depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the promise of addressing environmental harm at a later stage obstructs a thorough evaluation of effectiveness and the assessment of residual impacts. This postponement of essential information contravenes the procedural integrity of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established before any determination is made.

There are also crucial evidential shortcomings, including insufficient baseline data, methodological limitations, and the reliance on assumptions rather than site-specific evidence. Such gaps result in uncertainty regarding the scale and significance of impacts, particularly when negligible or non-significant effects are asserted without robust data to support these conclusions. This lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that fail to meet statutory requirements.

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, especially concerning protected species and sensitive habitats. Moreover, the proposal does not comply with National Planning Framework 4, which includes stipulations about biodiversity protection and environmental integrity, as it cannot be demonstrated 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 collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies preclude a lawful and rigorous evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species within the West Lewis coastal environment is severely lacking. This area is a biologically active and sensitive marine system, yet the baseline data presented is insufficient, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to provide a reliable evidential basis for evaluating potential impacts.

Notably, there is a significant omission regarding otters, classified as a European Protected Species. The application does not properly recognise their active use of

coastal areas for foraging and movement. This oversight, which neglects their core foraging range and behavioural patterns, means that the possible effects of construction disturbance, noise, and increased activity have not been sufficiently assessed. This gap undermines the conclusions drawn about the absence of significant effects on this species.

There are further shortcomings in the evaluation of basking sharks, where reliance on aerial surveys introduces substantial detection bias, particularly in the Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions reached.

The methodological limitations identified suggest that the conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of comprehensive baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to identify or assess protected species adequately. The uncertainty generated hinders the possibility of excluding adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted is deeply flawed, exhibiting serious internal inconsistencies and significant gaps in evidence that undermine its findings. The application does not meet the necessary evidential standard to demonstrate that the internationally important seabird populations along the west coast of the Isle of Lewis, which are already experiencing declines, will not be adversely impacted. Key foraging areas and migratory pathways are within the development's location; however, the assessment inadequately addresses the risks associated with displacement, collision, and habitat loss.

A critical contradiction arises in the application, where the developer asserts there are no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is typically invoked when significant harm is anticipated. This

inconsistency raises serious doubts about the credibility of the assessment, indicating that the conclusions drawn are not backed by the requisite evidence. Furthermore, there is insufficient evidence presented to confirm that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds has not been adequately considered, and the reliance on modelling techniques introduces further uncertainty, particularly for species like Kittiwakes and Fulmars that are already in critical decline. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of comprehensive understanding of behavioural responses.

The placement of turbines within an established migratory corridor poses an additional severe risk, effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The assessment fails to sufficiently evaluate the long-term implications of ongoing mortality in this corridor, as well as the potential repercussions for species with small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements needed to conclude that there would be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, obstructing a lawful conclusion that would support the granting of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage in the application is severely lacking, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, tradition, language, and community are interwoven. The approach adopted is overly simplistic, treating heritage as a collection of isolated and static assets, disregarding their ongoing social, spiritual, and cultural significance within the community.

Particularly concerning is the treatment of important cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they are active sites of burial and spiritual practice. However, the assessment reduces them to mere objects, ignoring their continued significance, meaning, and the potential impact of development on their surroundings. This misrepresentation leads to

an incomplete understanding of cultural effects and dismisses their importance in the lives of the community.

Moreover, the application overlooks intangible cultural heritage, including the Gaelic language and longstanding community ties to the coastal environment. These aspects are crucial to the area's identity but are completely absent from the assessment, constituting a significant oversight. The failure to acknowledge these elements means that the cultural implications of the development cannot be fully grasped.

Concerns extend to the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity recognised as characteristic of Indigenous Peoples. Yet, there has been no process of Free, Prior and Informed Consent. This lack of meaningful involvement not only weakens the validity of the assessment but also fails to uphold the established principles of community participation in decisions affecting cultural and environmental interests.

Furthermore, a serious procedural oversight is the failure to provide 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 impacts on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, clearly deviates from policy requirements.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory responsibilities culminates in a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not present a solid foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Available summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement rather than speculation. Nevertheless, the non-disclosure of the full assessment restricts proper scrutiny of these findings and inhibits the ability

to assess their significance in the decision-making process.

There are indications that the proposal is seen as a direct threat to community identity and cohesion, with references to "cultural loss" emerging from the developer's own findings. Despite this, these impacts have not been thoroughly integrated into the main application or given adequate consideration. The withholding of the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process, as a comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude. Particularly where community character and functioning may be influenced, the failure to provide the complete dataset results in an incomplete evidential basis for evaluating the balance between benefits and harm.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed management plans is a significant flaw in the application, which relies heavily on undefined future measures. This deferral of critical environmental safeguards prevents an adequate evaluation of whether the necessary protections against pollution events are in place. Without robust emergency response procedures and contingency planning prepared prior to consent, there is a procedural risk that undermines the authority's ability to assess environmental protection measures effectively.

The sensitivity of the West Lewis coastline heightens concerns regarding the incomplete assessment of construction and pollution risks. This area is home to clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination. While the application acknowledges risks such as

sediment mobilisation and the potential for chemical or oil spills, it fails to provide sufficient detail on how these risks will be mitigated or monitored effectively.

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

From a regulatory standpoint, the failure to include detailed Construction Environmental Management Plans or Pollution Prevention Plans contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and necessary mitigations are assessed prior to the granting of consent. The application's deficiencies in demonstrating compliance with policy requirements related to environmental protection and water quality further illustrate its incomplete nature.

Taken collectively, the lack of clearly defined mitigation measures and uncertainty regarding potential impacts result in a materially deficient assessment. These shortcomings inhibit a thorough evaluation of construction and pollution risks and highlight the application's overall incompleteness.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life as presented in the application is inadequate and lacks a thorough examination of ecological and socio-economic implications. The West Lewis coastal waters are home to a rich marine ecosystem and support a vibrant fishing industry. However, the application fails to prove that these vital uses and habitats can be preserved or maintained without causing significant disruption.

A major concern is the premise that fishing activities can be relocated without repercussions. The application lacks evidence to demonstrate that alternative fishing grounds are available, accessible, or capable of accommodating the additional pressures that may arise. This gap is critical, as such displacement could lead to overfishing in other areas and may adversely affect the local fishing fleet's economic stability. Without a robust, evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over considerable distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is troubling; nevertheless, the application diminishes the importance of these potential effects without adequate supporting evidence.

Moreover, there exists a notable contradiction within the application, where the necessity for licenses to permit harm to European Protected Species is recognised, yet the impacts are simultaneously categorised as negligible. This inconsistency undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, especially where harm is expected to an extent that requires legal approval.

Additionally, the assessment does not adequately address cumulative impacts stemming from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a detailed evaluation of these collective effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, the application fails to show adherence to the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with current marine users or avoid detrimental impacts on marine biodiversity, thereby precluding any conclusion that the proposal is sustainable.

In summary, the combination of insufficient evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies results in an assessment that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents an incomplete assessment of the onshore infrastructure, failing to address the full extent of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are inextricably linked, yet they have been evaluated separately, leading to a fragmented analysis that obscures the true scale of both environmental and socio-economic effects.

Included among the onshore elements are the installation of cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The assessment does not comprehensively evaluate these impacts, thus hindering a complete understanding of the project's environmental footprint.

Furthermore, the application's exclusion or deferral of onshore impact assessments obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components together, yet the delineation between offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application fails to demonstrate that a thorough assessment of these habitats has been conducted or that suitable avoidance measures have been instituted, thus revealing a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises concerns about potential conflicts with existing land use and legal rights. The absence of evidence indicating that the requisite consents or processes have been initiated brings into question the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and to demonstrate the protection of peatlands, habitats, and land use interests is in conflict with both the National Marine Plan and National Planning Framework 4. The lack of evidence supporting the avoidance or mitigation of impacts further undermines the application.

In summary, the segmentation of project components, coupled with the absence of a thorough assessment and insufficient evidence regarding environmental and land use impacts, renders this portion of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The application fails to assess the impacts on nocturnal wildlife, which is a critical oversight. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, as it can lead to disorientation and an increased risk of collision. There is no lighting impact assessment or phototaxis study included in the proposal, which means it does not evaluate how the introduction of aviation lighting may affect these species or contribute to increased mortality rates.

Furthermore, reliance on daytime survey data in the ornithological assessment neglects nocturnal activity and the associated risks. Kittiwakes, which may forage or migrate at night, are similarly vulnerable to disorientation caused by artificial lighting, yet this potential risk has not been investigated. The lack of specific night-time data leaves a significant gap in understanding the ecological impacts that may arise.

The proposal introduces permanent red aviation lighting, which would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment and is not assessed for its impact on visual amenity, landscape character, or the experiences of residents and visitors. Given the West Lewis coastline's exceptionally dark skies, which are integral to its environmental quality, cultural identity, and tourism value, this omission is substantial.

Without proper assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The required

evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, which invokes the precautionary principle and prevents a lawful determination of the application.

From a policy standpoint, the lack of assessment conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment. Collectively, the failure to consider dark skies and nocturnal wildlife creates a considerable evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The proposed development has significant implications for tourism on the Isle of Lewis, a sector that is integral to the local economy. Tourism is reliant on the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness. The application recognises that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the economic contributions associated with tourism.

Economic growth within tourism has been notable, with revenue increasing from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs while accounting for up to 16% of the island's economy. However, the application does not assess how the industrialisation of the seascape and the potential decline in environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. This lack of analysis creates uncertainty regarding whether the development could yield a net economic benefit or adversely affect an established and burgeoning sector.

Moreover, the assessment neglects to examine the critical role that environmental quality plays in attracting tourists. Unspoiled landscapes and dark skies are essential to enhancing visitor experiences and tapping into emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the impacts on this evolving aspect of the local economy.

In a community that already faces challenges due to limited economic diversification, the oversight in assessing tourism impacts carries broader implications for local employment, businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities tied to tourism have not been properly evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to show a net benefit. It also contradicts strategic objectives that prioritise

tourism as a growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the inability to quantify tourism impacts, assess environmental influences on visitor behaviour, and consider the island's economic reliance leads to a significant evidential gap. This gap hinders a thorough evaluation of economic effects, reinforcing the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal reveals critical shortcomings in its approach to sustainable development, failing to meet statutory duties, national policy, and evidential standards. This application mirrors the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key factor. Now, under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, these same concerns are raised yet again.

A reliable evidential basis for the determination is notably lacking in this proposal. There are significant gaps in baseline data, an ambiguous design envelope is used, and the mitigation measures proposed remain unspecified. Furthermore, crucial impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have not been addressed. As a result, the Environmental Impact Assessment is inadequate, leaving a comprehensive understanding of likely significant effects or residual impacts unattainable.

The procedural aspects of the proposal also exhibit clear failures. The missing compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, this proposal is at odds with National Planning Framework 4, as it fails to protect biodiversity, natural landscapes, and cultural heritage. It does not adequately address health and wellbeing impacts and lacks evidence of any net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore components have not been thoroughly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and could be significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete, and some inconsistencies exist within the findings. The evidential threshold required to confidently exclude adverse effects has not been met, activating the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal would induce 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 tourism impacts represent permanent effects that cannot be mitigated effectively.

In summary, the application is procedurally and substantively unfit for determination. The extensive deficiencies in information, combined with conflicts with policy and unresolved environmental risks, hinder any lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke the necessary regulatory provisions to obtain the missing information.

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

Additional Comments

The assessment of risks to the environment, communities and nature resulting from this proposal have not been fully evaluated or quantified. This represents a gross failure to all and everything impacted by the proposed wind farm and indeed a significant risk to the viability of the project itself!

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: 09224D01

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 regimes. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and accompanying documents, revealing significant planning, environmental, cultural, and procedural deficiencies. The project is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The design, scale, and proximity of the project raise serious concerns about its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There are notable gaps in critical environmental data, with baseline information being both limited and inconsistent. Several key elements of the proposal are not well-defined. Furthermore, the adoption of a flexible design framework complicates the assessment of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence to substantiate them.

There are also evident and substantial conflicts with policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory criteria necessary for consent and hinder the competent authority's capacity to conclude that the development can be accepted under policy considerations.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, 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.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is critically insufficient and fails to satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a

structured and reasoned comparison of viable alternatives based on their environmental effects, the application offers a narrative account of the project's evolution. This method does not adequately demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

There is a clear lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact highlight the importance of such an analysis; without it, one cannot conclude that the proposed siting is the least damaging option.

These deficiencies also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This oversight includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance, alongside the absence of comparative analysis, suggests that mitigation by design has not been utilised, with an over-reliance on post-design measures instead.

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

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that supports the overall conclusion that the application has not been adequately evaluated and cannot lawfully be determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is seriously lacking. This region is known for its sensitivity and biological activity, yet the baseline data presented is inadequate. The methodologies employed do not sufficiently capture the presence, behaviour, or habitat usage of key species, leading to a lack of reliable evidence for evaluating potential impacts.

In particular, there is a significant oversight regarding otters, classified as a European Protected Species. The application fails to properly acknowledge their active utilisation of coastal areas for foraging and movement. As a result, the assessment does not adequately consider their core foraging range and behaviour, leaving the potential impacts of construction disturbances, noise, and increased activity inadequately

evaluated. Consequently, any claims regarding the absence of significant effects on otters are fundamentally undermined.

Furthermore, the assessment of basking sharks is flawed due to an overreliance on aerial surveys, which introduce significant detection bias, particularly under Atlantic weather conditions. This methodology likely leads to an underestimation of their presence, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The disregard for such critical data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings result in conclusions of negligible or non-significant effects being based on mere assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers any meaningful analysis of cumulative and indirect impacts, including seasonal changes and interactions within the broader ecosystem. This introduces uncertainty about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species are notably absent. The resulting uncertainty prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These critical deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the 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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, reveals a critical deficiency in the assessment process. These locations serve as active places of burial and spiritual practice, yet they are mischaracterised as static features. This oversight neglects their ongoing use and meaning, as well as the impact of development on their setting, leading to an incomplete evaluation of cultural effects and a disregard for their role in community life.

Furthermore, the assessment fails to address intangible cultural heritage, including the Gaelic language, 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 evaluation, representing a significant gap. Without acknowledging these factors, the true cultural impact of the development remains

obscured.

Additionally, there are serious concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity with recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and disregards established principles of participation in decisions that affect cultural and environmental interests.

The assessment further suffers from a critical procedural failure, as it does not include a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment hinders 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 deficiencies directly contravene the National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, signifies a clear departure from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development have not been properly evaluated, leaving the application without a solid foundation for understanding the true cultural cost it entails.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with the proposal is fundamentally inadequate and lacks the necessary transparency for a valid evaluation. Although the developer has commissioned a Social Impact Assessment, which included engaging with local residents through focus groups, the absence of the full report creates a significant evidential gap. This gap hampers both public understanding and the competent authority's ability to grasp the comprehensive social risks identified in the developer's own research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts stem from direct engagement rather than speculation. However, the withholding of the complete assessment stifles thorough scrutiny of the findings and restricts the capacity to evaluate their importance in the decision-making process.

Additionally, there is notable evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Nevertheless, these adverse impacts have not been sufficiently incorporated into the main application or accorded the necessary weight. The lack of access to the full Social Impact Assessment effectively obscures the real human and

social costs of the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A full understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functioning could be at stake. The failure to provide the complete dataset means the application does not offer a thorough evidential basis to assess the balance between potential benefits and harms.

From a policy standpoint, the application does not illustrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the available evidence highlights existing adverse effects that remain undisclosed. Without the full assessment, it cannot be established that the application adheres to this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a sound socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission in the application and signifies a failure to meet the evidential standards mandated by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, together with the documented existing adverse impacts, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information.

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 does not adequately reflect the scale of change or the sensitivity of this environment. The introduction of large-scale turbines near the shoreline would create a dominant industrial presence, fundamentally altering the character of the landscape and resulting in a permanent transformation.

The application fails to accurately portray the magnitude of the visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This domination would significantly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment does not properly convey this level of impact or its significance in such a sensitive landscape.

Moreover, there are concerns regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of the visual impact has been understated, thereby

undermining the reliability of the assessment.

Another deficiency is the lack of assessment of the interconnectedness between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape setting linked visually and spatially to the Atlantic horizon. The assessment treats these as isolated assets without recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt the relationships between these heritage assets and alter the context in which they are experienced. This disruption not only represents a visual impact but also a broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy perspective, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is not compatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The absence of a robust worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting change is fundamental and permanent, making it impossible to reduce to an acceptable level through mitigation.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These 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 construction and pollution risks presented in this application is significantly lacking and fails to deliver the necessary detail for a thorough assessment of potential environmental impacts. Involvement in extensive seabed preparation and installation activities in a high-energy Atlantic setting is proposed, yet there are no well-defined Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application leans on mitigation and contingency strategies that are intended to be formulated after consent has been granted, inhibiting a genuine appraisal of their potential effectiveness or adequacy.

This dependency on unspecified future measures is particularly alarming, considering the delicate nature of the receiving environment. The coastline of West Lewis is home to clean coastal waters and crucial habitats that are sensitive to disturbances from sediment and contamination. Although the application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide ample detail on preventative, control, or monitoring strategies.

There is also considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive modelling and clearly established management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats recognised as sensitive within the broader assessment framework.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the ability to evaluate whether adequate safeguards are in place to manage pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment framework. Significant effects and mitigation must be evaluated before consent can be granted, and in the absence of this information, a lawful determination is unattainable. 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 culminate in a materially deficient assessment. These deficiencies hinder a comprehensive evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of the application is fundamentally inadequate, particularly concerning the impacts on marine life and the local fishing industry. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application fails to adequately ensure that these essential habitats and industries will be protected from significant disruption.

A major concern is the erroneous assumption that fishing activities can be displaced without repercussions. The application does not provide any evidence to suggest that alternative fishing grounds exist or are capable of accommodating the displaced activities without incurring additional pressures. This lack of information is critical, as such displacement could lead to overfishing in other areas, thereby threatening the livelihoods of local fishers and the local economy. Without a thorough, evidence-based assessment, the effects on fisheries and the communities reliant on them remain poorly understood.

Additionally, the proposal poses notable threats to marine species, particularly due to the underwater noise associated with construction activities. The anticipated use of high-energy hammer piling for extended periods is likely to cause widespread

disturbance, particularly affecting species such as dolphins. The potential impact on a significant portion of the local bottlenose dolphin population is of considerable concern, yet the application minimises these risks without sufficient evidence to support its conclusions.

There is also an evident contradiction within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously classifying the impacts as negligible. This inconsistency undermines the overall credibility of the assessment and raises serious questions about adherence to the Habitats Regulations, especially when harm is indicated to a degree that would require legal permissions.

Furthermore, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disruption, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to determine the overall consequences for marine ecosystems and local socio-economic conditions.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which precludes any assertion that the proposal embodies sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions all contribute to an incomplete and unreliable assessment. These shortcomings hinder a thorough evaluation of the potential impacts on both marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a fragmented assessment of onshore infrastructure, which fails to fully address the integrated nature of the project. The offshore turbines and associated onshore works are fundamentally linked, yet the current evaluation treats them separately, leading to an incomplete understanding of the environmental and socio-economic impacts.

The onshore works entail significant developments, such as cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities will involve excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. As it stands, the application does not provide a thorough assessment of these impacts, thus failing to convey the project's overall environmental footprint.

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

process stipulates that all elements of a project must be considered collectively. However, the disjunction between offshore and onshore components leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under existing policy. The application lacks sufficient evidence to show that these habitats have been thoroughly assessed or that suitable avoidance measures are in place, revealing a significant gap in biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbing peatland can release stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application fails to sufficiently address this matter or to demonstrate that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with established land use and legal rights. The application does not present evidence indicating that the necessary consents or processes have been undertaken, thereby casting doubt on the project's deliverability and lawful execution.

From a policy standpoint, the inability to assess the project comprehensively and to show that peatlands, habitats, and land use interests are protected stands in contradiction to the National Marine Plan and National Planning Framework 4. The lack of evidence demonstrating that impacts can be avoided or mitigated further compromises the application.

In conclusion, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts lead to an incomplete and unreliable application, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that would create a continuous and intrusive “wall of light” effect across the western horizon. This alteration fundamentally changes the night-time environment along the West Lewis coastline, which is characterised by exceptionally dark skies that are essential to the area's environmental quality, cultural identity, and tourism value. However, the assessment of dark skies and their impact on nocturnal wildlife has been entirely omitted from the Environmental Impact Assessment, representing a significant gap in the evaluation process.

The application fails to evaluate how this lighting affects visual amenity, landscape character, and the experiences of both residents and visitors. Given the importance of dark skies to the local identity and the growing astro-tourism sector, this omission is critical. Additionally, there is no analysis of the potential impacts on nocturnal wildlife,

particularly species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are highly sensitive to artificial lighting. The absence of a lighting impact assessment or a phototaxis study means that the effects of aviation lighting on these species, including the risk of disorientation and increased mortality, have not been considered.

Moreover, the ornithological assessment relies solely on daytime survey data, neglecting nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, could also be affected by artificial lighting, but this risk remains unassessed. The lack of site-specific night-time data creates a significant shortcoming in understanding ecological impacts.

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

From a policy standpoint, this omission is inconsistent with National Planning Framework 4 regarding the protection of natural places and environmental quality. It further undermines the comprehensive assessment of landscape and seascape impacts, as night-time character is a fundamental aspect of the environment.

Overall, the failure to assess dark skies and the impacts on nocturnal wildlife creates a considerable evidential gap. The application is incomplete due to the lack of baseline data, impact modelling, and species-specific analysis, rendering it incapable of supporting a lawful determination.

TOURISM

The application acknowledges that 86% of visitors are drawn to the Isle of Lewis by its scenery. However, it lacks a quantified assessment of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of tourism. This is particularly concerning given the significant growth in the tourism sector, which has increased from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. The failure to model the potential impacts of industrialisation on the seascape and environmental quality raises serious questions about the net economic benefit of the development and its implications for a vital and growing sector.

Moreover, the assessment neglects the critical role of environmental quality in sustaining tourism. Unspoiled landscapes and dark skies are fundamental to visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this issue, creating a notable gap in understanding the potential impacts on a significant and developing part of the local economy.

In an island community where economic diversification is limited, the lack of a comprehensive assessment of tourism impacts 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 evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4, particularly regarding the economic impact and the necessity to show net benefit. Furthermore, it conflicts with strategic objectives that position tourism as a priority growth sector and does not provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the failure to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic reliance results in a significant evidential gap. This prevents a thorough evaluation of economic effects and supports the conclusion that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Currently, it is being submitted under a policy framework that emphasizes biodiversity, peatland conservation, landscape integrity, and community wellbeing more strongly.

The application lacks a comprehensive and reliable evidential basis, revealing critical gaps in baseline data, the persistent use of an unspecified design envelope, and an over-reliance on mitigation measures that are not clearly defined. Key impact pathways, such as those concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects, are omitted. Consequently, the Environmental Impact Assessment is insufficient, failing to provide a thorough understanding of likely significant effects or residual impacts.

There are notable procedural shortcomings as well. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory obligations under the Islands (Scotland) Act 2018. Moreover, the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural environments, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable, and it cannot substantiate a net economic benefit due to the lack of tourism impact

modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, clouding the assessment of impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with the proposal remain ambiguous and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some respects, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively inadequate for determination. The significant information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct any lawful, evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused entirely.

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: 58AA33D5

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

Dear Sir/Madam

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

The application is deficient in providing a sufficient evidential foundation necessary for a lawful decision. It lacks critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain unspecified. The reliance on a flexible design framework obscures the understanding of potential significant effects, and the proposed mitigation measures, which have not yet been defined, prevent any assessment of their effectiveness. Consequently, the documentation fails to furnish a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There are significant policy inconsistencies associated with the proposal. It does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural landscapes, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national obligations aimed at safeguarding biodiversity, climate interests, and environmental integrity. These policy conflicts directly relate to the statutory tests necessary for consent and impede the competent authority's capacity to ascertain the development's acceptability in policy terms.

The proposal's scale is unprecedented in this area, with large turbines being positioned very close to the shoreline, raising considerable concerns about landscape capacity, visual dominance, and environmental consequences. In conclusion, the combination of insufficient information, dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy guidelines indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the application of the precautionary principle is warranted.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies in the Environmental Impact Assessment Report are glaring, rendering it materially inadequate and failing to offer a full, transparent, or reliable account of the potential environmental effects linked to the proposal. The reliance on a flexible Project Design Envelope, lacking any commitment to definitive turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, compromising the integrity of the assessment and inhibiting both the public and the competent authority from grasping the true scale of environmental impacts.

Moreover, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is sought on the premise that environmental harm will be mitigated later, which hinders any meaningful evaluation of their effectiveness or the assessment of residual impacts. This delay in providing essential information until after consent is procedurally unacceptable and undermines the fundamental aims of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation strategies be clearly established prior to decision-making.

Evidential deficiencies are also present, marked by gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially in cases where negligible or non-significant effects are concluded without robust supporting data. The lack of sufficient information inhibits a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that contradicts statutory requirements.

As a result, the application does not meet the evidential threshold set by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This scenario invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fundamentally fails in its assessment of alternatives, which does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on their environmental effects, it presents merely a narrative account of the

project's evolution. This method does not adequately demonstrate that the developer has identified, assessed, and selected less harmful options over more damaging ones.

Furthermore, there is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Specifically, the application does not show that the developer has given serious consideration to placing turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be diminished. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in impact assessment, the absence of such analysis casts doubt on whether the proposed siting is indeed the least damaging option.

The shortcomings extend to the assessment of cable routing and landfall, where there is insufficient evidence of a thorough exploration of alternative routes to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the application has not applied mitigation by design but instead relies on post-design mitigation measures.

Consequently, the proposal does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This reflects a disregard for the established mitigation hierarchy, hindering the competent authority's ability to determine whether more suitable, less harmful alternatives might exist. Without a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines compliance with National Planning Framework 4, particularly in terms of safeguarding natural places, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment represents a significant omission that leads to the conclusion that the application has not been adequately evaluated and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a severely deficient assessment of marine ecology and protected species, failing to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is known to be highly sensitive and biologically active, yet the baseline data remains incomplete. Furthermore, the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable shortcoming involves otters, classified as a European Protected Species. The application inadequately addresses their active foraging and movement within coastal areas. This neglect of their core foraging range and behavioural patterns raises concerns about the potential effects of construction disturbance, noise, and increased

activity, which have not been sufficiently evaluated. Such oversights undermine any assertions regarding the lack of significant effects on this species.

The evaluation of basking sharks also reveals significant deficiencies, particularly due to an over-reliance on aerial surveys that introduce notable detection bias, especially under Atlantic conditions. This methodology likely underestimates the sharks' presence, especially when compared to established land-based observations that indicate these waters are frequently used by them. The failure to properly consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data prevents a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the true scale of risks posed to marine species and habitats.

Regulatory scrutiny reveals that the application does not satisfy the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4. The failure to properly identify or assess protected species introduces a level of uncertainty that precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In such circumstances, the law does not permit consent to be granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overall determination that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally significant seabird populations that are already in decline. However, the ornithological assessment accompanying the application is fundamentally flawed. It contains significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The assessment fails to sufficiently demonstrate that these vulnerable species will not be adversely affected, particularly in light of the potential for displacement, collision risk, and habitat loss.

Compounding these issues is a fundamental contradiction within the application itself, where the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions are not adequately supported by the available evidence.

Moreover, the assessment does not provide enough evidence to confirm that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not thoroughly addressed, and the reliance on modelling techniques introduces further uncertainty, especially concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly given the inadequacy of baseline data and the incomplete understanding of behavioural responses.

Additionally, the siting of turbines within a recognised migratory corridor introduces a considerable risk by creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately evaluate 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 effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and limitations in modelling, indicates that the required standard of proof beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle and renders a lawful conclusion in support of consent impossible.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the potential impacts on seascape, landscape, and visual aspects is fundamentally lacking and does not truly capture the extent of the changes or the delicate nature of the environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a strong feeling of remoteness. The proposal to install large-scale turbines near the shoreline would introduce a continuous and imposing industrial presence, drastically altering this character and leading to a permanent and irreversible change in the landscape.

Moreover, the application fails to adequately portray the extent of the visual alterations expected. Due to their size and proximity, the turbines would overshadow 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 accurately reflect the significance of these impacts within such a sensitive landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. There is evidence suggesting that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This poses a risk that the severity of the visual impact has been minimised, calling into question the reliability of the assessment.

Another notable shortcoming is the failure to evaluate the interconnected relationship among landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, linked visually and spatially to the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are perceived and severing their ties to the natural horizon. This represents not just a visual impact but a wider cultural and spatial harm that has not been sufficiently examined within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The extent of the changes is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

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

In conclusion, the assessment fails to accurately depict the extent of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works within a high-energy Atlantic environment, raising substantial concerns about the assessment of construction and pollution risks. Currently, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead,

the application depends on unspecified mitigation and contingency measures to be developed after consent, which hinders any meaningful evaluation of their effectiveness or adequacy.

This reliance on undefined future measures is particularly alarming considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges potential risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on how these issues will be prevented, controlled, or monitored.

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

The deficiencies are further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Likely significant effects and necessary mitigation must be evaluated prior to consent, and without this information, a lawful determination cannot be achieved. Moreover, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Collectively, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts render the assessment materially deficient. These issues prevent a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment presented in the application regarding fisheries and marine life is notably inadequate, lacking a thorough evaluation of the ecological and socio-economic impacts involved. The marine environment off the West Lewis coast is home to a rich array of marine species and supports a vibrant fishing industry. However, the application does not convincingly demonstrate how these vital uses and habitats can be safeguarded from significant disruption.

A critical concern is the assumption made that fishing activities can be displaced without resulting consequences. There is no substantiated evidence provided to suggest that alternative fishing grounds are available or accessible, nor that they could sustain the increased pressure from displaced fishing activities. This significant omission raises the potential for overfishing in other areas, which may yield broader economic repercussions for the local fishing fleet. Consequently, without a transparent and evidence-supported evaluation, the impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life over considerable distances, including populations of dolphins. The expected disturbance to a considerable segment of the local bottlenose dolphin population prompts serious concern, yet the application minimizes the importance of these effects without sufficient backing evidence.

In addition, there exists a clear inconsistency within the application where the necessity for licenses to permit harm to European Protected Species is recognised, whilst simultaneously asserting that the impacts are negligible. This contradiction calls into question the credibility of the assessment and raises significant concerns regarding adherence to the Habitats Regulations, especially where harm is projected to an extent that necessitates legal authorisation.

Furthermore, the assessment fails to adequately address the cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activity. In the absence of a comprehensive evaluation of these interconnected effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately assessed.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus hindering any determination that the proposal embodies sustainable development.

Ultimately, the lack of evidence concerning the displacement of fishing activities, the underestimation of acoustic impacts, and the internal inconsistencies of the application culminate in an assessment that is both incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises critical concerns about carbon balance. Disturbance of peatland has the potential to release stored carbon, leading to a carbon debt that runs counter to the aims of renewable energy development. The application fails to sufficiently address

this matter or demonstrate that the overall carbon balance remains beneficial.

Moreover, significant risks are present for sensitive habitats, including machair systems and peatland environments, which are protected by policy. There is no evidence in the application that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been taken. This indicates a troubling evidential gap regarding biodiversity protection.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application does not present evidence that necessary consents or processes have been initiated, raising doubts about the feasibility and lawful implementation of the project.

The assessment of onshore infrastructure is notably incomplete and neglects the full extent of impacts from what constitutes a single integrated project. The offshore turbines and onshore works are interconnected, yet they are evaluated separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects. This division prevents a proper evaluation of cumulative impacts, as the Environmental Impact Assessment process requires a holistic consideration of all project components. The separation of offshore and onshore elements means that the combined effects on peatlands, habitats, and communities remain inadequately understood.

Additionally, the onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure through sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, poses significant risks due to its importance as a carbon store and ecologically sensitive habitat. The application does not offer a comprehensive assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the critical concerns that led to the refusal of the Lewis Wind Power proposal in 2008, notably the unacceptable

scale of industrialisation. The current proposal is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not adequately address these priorities.

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

Procedural failures are also evident. The proposal lacks a compliant Island Communities Impact Assessment, violating statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a full Social Impact Assessment is a significant omission. These shortcomings impede the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

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

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

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

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

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

Additional Comments

I challenge why N4 was moved from the west of the shipping route to inside the shipping lane.

Further, I challenge the funding and the recipients of the benefits: why is the Scottish Government approving funding for incomplete planning, and why does the Isle of Lewis not at least benefit from the electricity generated given the inevitable impact on the land during construction and sitings of generators/batteries regardless of the N4 location being outside or inside the shipping route.

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: 2DDFEDEE

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline, which raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The development is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application fails to provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework inhibits a clear understanding of likely significant effects, while the use of unspecified mitigation measures means their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive policy conflicts associated with this 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 that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. These conflicts directly relate to the statutory tests required for consent and undermine the capacity of the competent authority to conclude that the development is acceptable in policy terms.

Taken together, the absence of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In these circumstances, it is imperative that the precautionary principle applies.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and lacks a comprehensive, transparent, and dependable account of the potential environmental impacts associated with the proposal. The adoption of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for turbines, introduces considerable uncertainty. This uncertainty hinders a consistent application of a worst-case scenario analysis, thereby compromising the integrity of the

assessment. As a result, the projected impacts may not accurately reflect the development that is ultimately realised, which obstructs both public understanding and the ability of the competent authority to grasp the full extent of the environmental consequences.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be established. This approach seeks consent on the premise that any environmental harm will be rectified at a subsequent stage, which complicates a meaningful evaluation of their effectiveness and the assessment of residual impacts. Such a postponement of critical information to post-consent phases is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and their mitigation must be distinctly identified before a determination is made.

Significant evidential deficiencies also exist within the application, marked by gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than robust, site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially in instances where conclusions regarding negligible or non-significant effects are drawn without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot satisfy statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been comprehensively evaluated or that suitable safeguards are in place.

In summation, the reliance on an undefined design envelope, the absence of specific mitigation measures, and the notable gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects, leaving the competent authority incapable of making a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is characterised by a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is significantly deficient. There is an incomplete understanding of ecological receptors within this area, primarily due to inadequate baseline data and ineffective methodologies that fail to accurately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A notable oversight in the application involves otters, which are classified as a European Protected Species. The assessment does not adequately acknowledge their active use of coastal areas for foraging and movement, and it overlooks their core foraging range and behavioural patterns. This omission means that the potential impacts of construction disturbance, noise, and increased activity have not been properly evaluated, ultimately undermining claims of no significant effects on the species.

Further issues arise with the assessment of basking sharks, which relies heavily on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate or appropriately consider such information results in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

The limitations in these methodologies lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty about the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as the identification and assessment of protected species are inadequate. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a significant concern regarding its ability to meet the evidential threshold necessary for concluding that there will be no adverse effect on the integrity of protected sites. The ornithological assessment contains considerable gaps in evidence, coupled with internal contradictions that undermine its reliability. Notably, the assessment fails to robustly evaluate the implications associated with displacement, collision risk, and habitat loss for seabird populations in key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is known to support internationally important seabird species, many of which are already in decline.

A critical inconsistency is evident in the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessitated when significant harm is anticipated. This contradiction raises serious doubts regarding the validity of the assessment and highlights that the conclusions drawn are not underpinned by sufficient evidence.

Furthermore, the assessment does not adequately demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It fails to fully account for the importance of these feeding grounds, and its reliance on modelling approaches introduces an element of uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

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

The cumulative effect of these deficiencies signifies 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 this proposal in direct opposition to national policy.

Overall, the assessment is marred by methodological weaknesses, insufficient evidence, and internal inconsistency, which collectively hinder a robust evaluation of impacts. These shortcomings lead to the conclusion that the application does not satisfy the statutory requirements necessary for a lawful determination.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life is inadequate, lacking a thorough evaluation of ecological and socio-economic repercussions. The coastal waters off West Lewis host a diverse marine ecosystem alongside an active fishing industry. However, the application fails to demonstrate how these vital habitats and activities can be preserved without significant disruption.

A critical concern lies in the assumption that fishing activities can be relocated without negative consequences. The application does not provide any evidence that alternative fishing grounds exist, are accessible, or can accommodate the additional pressures that may arise. This oversight is particularly important, as displacing fishing efforts could lead to overfishing in other areas, which may result in broader economic ramifications for the local fishing fleet. In the absence of a well-supported and clear

assessment, the potential impacts on both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal presents considerable risks to marine species, especially from the underwater noise generated during construction activities. High-energy hammer piling over extended periods is expected to create disturbances across considerable distances, which could affect species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming concerns; yet, the application diminishes the importance of these effects without adequate supporting evidence.

Inconsistencies within the application are evident, particularly in acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction undermines the reliability of the assessment and raises serious concerns about adherence to the Habitats Regulations, especially where anticipated harm may necessitate legal authorisation.

Furthermore, the assessment fails to address cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a detailed examination of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

From a policy standpoint, the application does not show compliance with the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity, hindering any assertion that the proposal constitutes sustainable development.

Considering these points collectively, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment flawed and unreliable. These shortcomings impede a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure lacks completeness and fails to address the full range of impacts associated with this single integrated project. There is an intrinsic link between the offshore turbines and the onshore works, yet they are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects.

Onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a significant carbon store

and is an ecologically sensitive habitat. The application falls short in providing a thorough assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application inhibits a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project are considered collectively. However, the distinct treatment of offshore and onshore elements leads to an incomplete understanding of their combined impacts on peatlands, habitats, and communities.

Moreover, there are notable risks to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This leaves a significant evidential gap regarding biodiversity protection.

The proposal also raises serious concerns about carbon balance. Disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy initiatives. The application inadequately addresses this aspect or proves that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is insufficient evidence that the necessary consents or processes have been initiated, which raises concerns about the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project as a cohesive unit and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The lack of evidence to show that impacts can be avoided or mitigated further undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant evidential gap. The West Lewis coastline is noted for its exceptionally dark skies, which are essential to the region's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting, which would be visible over considerable distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly notable given the significance of dark skies to the area's identity and the growth of tourism sectors, such as astro-tourism. The neglect of these impacts represents a shortfall in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and heightened collision risks. The application does not include any lighting impact assessment or phototaxis study, thereby failing to assess the potential effects of aviation lighting on these species and the risk of increased mortality.

This deficiency is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or related risks. Other species, such as Kittiwakes, which may forage or migrate at night, are similarly vulnerable to disorientation due to artificial lighting, yet this risk has not been addressed. The lack of site-specific night-time data creates a substantial gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

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

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife signifies a major evidential deficiency. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to facilitate a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in terms of sustainable development, failing to meet statutory duties, national policy, and evidential standards. The issues presented echo those that led to the rejection of the Lewis Wind Power proposal in 2008, as the scale of industrialisation was deemed unacceptable. This current application is made under a more stringent policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis for the application, with the use of an

undefined design envelope, unspecified mitigation measures, and the omission of significant impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. This renders the Environmental Impact Assessment incomplete, hindering a full understanding of potential significant effects and residual impacts.

In terms of procedural integrity, the lack of a compliant Island Communities Impact Assessment breaches the statutory duty established by the Islands (Scotland) Act 2018. Furthermore, the failure to provide a full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate the effects on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contravenes National Planning Framework 4, as it does not sufficiently protect biodiversity, natural habitats, or cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of net economic benefits due to the absence of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks are notable, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

Moreover, the proposal is set to cause 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, alongside adverse impacts on tourism, all represent permanent changes that cannot be sufficiently mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, combined with conflicts with established policy and unresolved environmental risks, obstructs any lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or enforces regulatory provisions to compel the submission of the outstanding information. Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm be denied in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B2FD857F

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 supporting documents has uncovered material deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence. The site is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns arise regarding the proposal's scale, proximity, and design, particularly in relation to statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and essential aspects of the proposal remain undefined. The flexible design framework employed obscures a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, while assertions of negligible or non-significant effects are not substantiated by robust evidence.

Policy conflicts are both clear and substantive. 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 health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and impede the competent authority's capacity to determine the development's acceptability from a policy perspective.

The unprecedented scale of the proposal presents significant concerns regarding landscape capacity, visual dominance, and environmental impact, with large turbines positioned near the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unsuitable for 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, failing to deliver a comprehensive, transparent, or dependable evaluation of the environmental repercussions of the proposal. There exists considerable uncertainty due to the employment of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines. This lack of commitment compromises the integrity of the assessment, leaving both the public and the competent authority unable to grasp the true extent of potential environmental effects.

Key information regarding mitigation measures, monitoring strategies, and management plans remains undefined, leading to a situation where consent is sought under the premise that any environmental harm will be rectified at a later stage. Such a deferral not only obstructs a meaningful assessment of effectiveness but also contravenes the principles of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly established prior to determination.

In addition, the application displays substantial evidential deficiencies, such as gaps in baseline data and limitations in methodology. Reliance on assumptions rather than site-specific evidence exacerbates uncertainty concerning the scale and significance of impacts. This is particularly evident when negligible or non-significant effects are concluded without adequate supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to align with statutory requirements.

Due to these shortcomings, the application does not meet the necessary evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate alignment with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is unable to show that impacts have been thoroughly evaluated or that appropriate safeguards are established.

Overall, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These serious deficiencies prevent a lawful and robust evaluation of environmental effects, ultimately leaving the competent authority incapable of making an informed decision based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime, as it does not provide an adequate assessment of alternatives. Instead of a structured comparison of realistic alternatives based on their environmental effects, it offers a narrative account of how the project has evolved. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Furthermore, there is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the developer has not convincingly considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. Given the West Lewis coastline's sensitivity and the importance of proximity to the shore in assessing impact, the lack of such analysis hinders any conclusion that the proposed siting is the least damaging option.

The application also has significant shortcomings concerning cable routing and landfall assessment, as there is insufficient evidence that alternative routes have been thoroughly explored to minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The absence of a clear avoidance strategy, coupled with a lack of comparative analysis, shows that mitigation by design has not been adequately applied. Instead, there appears to be a reliance on post-design mitigation measures.

Consequently, the proposal does not demonstrate that environmental harm has been adequately minimised through site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether more appropriate and less harmful alternatives exist. Without a rigorous assessment of alternatives, it cannot be concluded that the proposal is a sustainable or compliant solution with existing policy.

From a policy standpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that leads to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and does not furnish a comprehensive or dependable understanding of the ecological receptors present in the West Lewis coastal environment. This area is characterised as a highly sensitive and biologically rich marine system, yet the baseline data provided is insufficient and the methodologies utilised do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment falls short of providing a solid evidential foundation for evaluating the impacts of the proposed developments.

A significant oversight involves otters, which are classified as a European Protected Species. The application inadequately acknowledges and evaluates the active utilisation of coastal areas by otters for foraging and movement. Without a proper assessment of their core foraging ranges and behavioural patterns, the potential consequences of construction disturbances, noise, and increased activity have not

been thoroughly examined. This lack of consideration undermines any conclusions drawn regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks is compromised by the reliance on aerial surveys, which introduce considerable detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. By failing to incorporate or adequately evaluate such data, the assessment produces an incomplete baseline, which diminishes the reliability of its conclusions.

The methodological shortcomings result in conclusions about negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of sufficient baseline data also hampers any meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates significant uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not accurately identified or assessed protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, it is clear that consent cannot be lawfully granted.

In summary, the combination of insufficient baseline data, flawed methodologies, and unsupported conclusions collectively undermines the reliability of the assessment. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks an adequate evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is significantly flawed and lacks the necessary evidence to support its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing declines. However, the application fails to provide adequate proof that these species will not be adversely affected by the proposed project. The location of the development falls within critical foraging areas and migratory pathways, yet the assessment does not thoroughly examine the potential risks of displacement, collision, or habitat loss.

There is a notable contradiction within the application itself, as the developer asserts that there are no significant adverse effects while simultaneously putting forth a Habitats Regulations derogation case, which suggests that significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, indicating that its conclusions lack solid support from the underlying

evidence. Furthermore, the assessment does not convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been comprehensively considered, and reliance on modelling approaches introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the inadequacies in baseline data and the incomplete understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor adds a substantial risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term effects of sustained mortality in this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standards necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This engages the precautionary principle and renders any conclusion in support of consent unlawful.

Moreover, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development lacks a robust assessment of cultural heritage and community identity, particularly in its failure to recognise the West Lewis coastline as a vibrant cultural landscape. This area is characterised by an intricate relationship between environment, language, tradition, and community. The application adopts a narrow perspective, viewing heritage merely as isolated and static assets, rather than acknowledging their active social, cultural, and spiritual significance within the community.

Central to the deficiencies identified are the culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment regards them as static features. This oversight neglects their ongoing use and meaning, as well as the implications of the proposed development on their setting, leading to an inadequate evaluation of cultural

impacts and a disregard for their integral role in community life.

The assessment also fails to account for intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These vital elements are crucial to the identity of the area, but their absence from the assessment signifies a significant gap. Without integrating these aspects, the true cultural implications of the development remain obscured.

Moreover, there are critical concerns regarding community rights and engagement. The Gaelic-speaking population, recognised for its unique cultural identity as an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement raises questions about the legitimacy of the assessment and does not align with established principles regarding participation in decisions that impact cultural and environmental interests.

A notable procedural shortcoming is the omission of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this required assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic consequences for the island community. This gap alone hinders lawful decision-making.

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

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application does not offer a sufficient foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This lack of transparency creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of the social risks identified through the developer's research. Summaries reveal that residents are currently experiencing stress, anxiety, and concern due to the scale and proximity of the proposal, with these effects arising from direct engagement rather than speculation. The withholding of the complete assessment limits scrutiny of these findings, obstructing the determination of their importance within the decision-making process.

Furthermore, there is evidence indicating that the proposal threatens community

identity and cohesion, with findings from the developer highlighting “cultural loss.” Despite this recognition, these impacts have not been adequately integrated into the main application or given proper consideration. This omission obscures the true human and social costs associated with the development, and undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is vital for developments of such scale, particularly when community character and functioning may be affected. Without the complete dataset, the application lacks a comprehensive evidential basis necessary for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development must foster positive health outcomes and prevent harm, yet available evidence indicates existing adverse effects that have not been fully disclosed. The absence of the full assessment means that compliance with this policy cannot be established.

The procedural ramifications are significant. The competent authority is unable to perform a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a material omission within the application and constitutes a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework. Collectively, the non-disclosure of the complete Social Impact Assessment, alongside evidence of ongoing adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application is inadequately supported by information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual, seascape, and landscape impacts is inadequate and does not truly capture the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a significant sense of remoteness. The placement of large-scale turbines near the shoreline would lead to a dominant industrial presence that would fundamentally change this character, resulting in a permanent and irreversible alteration of the landscape.

The application fails to properly depict the degree of visual change that would occur. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the level of impact or its importance within such a sensitive landscape context.

Methodological issues arise concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, especially in relation to key cultural heritage sites and high-value landscapes. This raises concerns that the actual

magnitude of visual impact may have been underestimated, thereby casting doubt on the assessment's reliability.

Additionally, there is a failure to recognise the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment fails to acknowledge this interdependence, treating these heritage assets as isolated, which leads to an incomplete understanding of their setting and cultural significance.

The industrialisation of the seascape would sever these vital connections, transforming the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This constitutes not only a visual impact but also a significant cultural and spatial detriment that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural spaces and historical assets. The magnitude of change is incompatible 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 diminishes any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal fails to demonstrate compliance with essential policy requirements concerning environmental protection and water quality. A crucial aspect of the application is the incomplete assessment of construction and pollution risks, which does not provide the necessary detail to evaluate the likely environmental effects. Given the substantial seabed preparation and installation works planned in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is a significant oversight. Instead, the application relies on mitigation and contingency measures that are to be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

This deferral of key environmental safeguards raises serious concerns, particularly in

relation to the sensitive receiving environment of the West Lewis coastline. The area supports clean coastal waters and critical habitats that are vulnerable to disturbances from sediment and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks detailed strategies for preventing, controlling, or monitoring these threats.

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

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risk and diminishes the competent authority's ability to assess the effectiveness of environmental protection measures at the time of determination.

Collectively, the lack of defined mitigation measures, inadequate management plans, and uncertainty surrounding potential impacts render the assessment materially deficient. These shortcomings significantly hinder a thorough evaluation of construction and pollution risks and further underline the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life lacks depth and fails to provide a solid 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 adequately demonstrate how these vital uses and habitats can be preserved or maintained without considerable disruption.

A critical concern is the assumption that fishing activities can simply be relocated without repercussions. The application does not present evidence showing that alternative fishing grounds are viable, accessible, or able to support the additional strain. This significant omission raises alarms, as the displacement of fishing could lead to overfishing in other areas, potentially harming the local fishing fleet's economic stability. Without a thorough and evidence-based evaluation, the repercussions on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal poses substantial threats to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended duration is likely to cause disturbances across vast distances, impacting species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population is alarming, yet the application

minimizes the seriousness of these effects without adequate substantiation.

The application exhibits a clear inconsistency by acknowledging the necessity for licences to authorise harm to European Protected Species, while simultaneously categorising the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal approval.

Additionally, the assessment neglects to consider cumulative impacts that arise from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activities. Absent a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project is fundamentally flawed as it treats onshore and offshore components separately, failing to recognise that they are part of a single integrated undertaking. This fragmented approach obscures the true scale of environmental and socio-economic impacts that arise from the entire project.

The onshore aspects of the proposal involve significant work, such as laying cabling across protected moorland, constructing a substation near Stornoway, and creating access routes through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which is both a vital carbon store and an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, which inhibits a complete understanding of the project's environmental footprint.

Moreover, by postponing or omitting the assessment of onshore impacts, the application fails to adequately evaluate cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project elements in conjunction, yet the disjointed evaluation of offshore and onshore components means that the combined effects on peatlands, habitats, and local communities are not fully appreciated.

There are significant threats to sensitive habitats, such as machair systems and peatland environments, which hold protective policy designations. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated or that effective avoidance measures are in place. This raises an evidential gap in relation to the protection of biodiversity.

Concerns regarding carbon balance also emerge from the proposal. The disruption of peatland can release stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy development. The application fails to adequately confront this issue or prove that the overall carbon balance is favourable.

Furthermore, routing infrastructure through active croft land could cause conflicts with existing land uses and legal rights. There is no evidence presented that necessary consents or processes have been initiated, which raises serious concerns about the deliverability and lawful execution of the project.

From a policy standpoint, the lack of an integrated 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 avoided or mitigated diminishes the credibility of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to consider the assessment of dark skies and nocturnal wildlife, representing a significant omission. The proposed installation of permanent red aviation lighting would be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally disrupt the night-time environment.

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the region's identity and its emerging tourism sectors, such as astro-tourism, this omission is particularly concerning. The lack of consideration for these effects leaves a clear gap in the landscape and environmental assessment.

More importantly, there has been no evaluation of the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting, which can cause disorientation and

increase the risk of collisions. The application does not provide any lighting impact assessment or phototaxis study, failing to address how the proposed aviation lighting may influence these species or raise mortality rates.

The situation is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, the omission contravenes National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is a significant failure in meeting the requirements of sustainable development as measured against statutory duties, national policy, and evidential standards. It echoes the critical concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This current application is presented under a more robust policy framework, one that places an increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A thorough examination reveals that the application lacks a complete and dependable evidential basis for determination. There are essential gaps in the baseline data, the design envelope remains undefined, and there is an overreliance on unspecified mitigation measures. Furthermore, it fails to address crucial impact pathways, including those affecting nocturnal wildlife, the entirety of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is insufficient, hindering a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The absence of a compliant Island Communities Impact Assessment constitutes a violation of statutory duties under the Islands (Scotland) Act 2018, and the lack of 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 inadequate for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, or cultural heritage. The proposal fails to validate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as there has been no tourism impact modelling. The cumulative impact of both offshore and onshore components has not been adequately assessed, obscuring the potential effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties regarding environmental risks, with the assessments of marine ecology, seabirds, protected species, and marine mammals being incomplete and occasionally inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and preventing any lawful conclusion that the impacts are acceptable.

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

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

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

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: 20A220BF

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and related documents has revealed significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The project is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and strong cultural heritage. Concerns arise from the scale, design, and proximity of the proposal, questioning its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful assessment. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, many key elements of the proposal remain undefined. This flexible design framework hinders a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a complete understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

There are evident and serious policy conflicts inherent in this proposal. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and the well-being of communities. The application does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical to the statutory tests needed for consent and undermine the competent authority's capacity to conclude that the development meets policy standards.

Moreover, the unprecedented scale of the proposal, with large turbines situated close to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to provide a transparent or reliable depiction of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This lack of commitment prevents a consistent worst-case scenario analysis, ultimately undermining the integrity of the assessment. Consequently, the impacts presented may not accurately represent the actual development, leaving both the public and the competent authority unable to comprehend the true environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured and reasoned comparison of realistic alternatives based on environmental effects. This assessment of alternatives is materially inadequate and does not meet the

statutory requirements of the Environmental Impact Assessment regime. The failure to demonstrate that less harmful options have been properly identified, assessed, and selected in preference to more damaging solutions is a significant shortcoming.

There is a notable absence of transparent or evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has meaningfully considered the possibility of positioning turbines further offshore, where potential visual, ecological, and coastal impacts might be lessened. The sensitivity of the West Lewis coastline, along with the critical role of proximity to shore in determining impact, highlights that the lack of such an analysis precludes any conclusion that the proposed siting is the least damaging option.

Furthermore, deficiencies are evident in cable routing and landfall assessment, with insufficient evidence provided to show that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including culturally significant sites such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with a lack of comparative analysis, suggests that mitigation by design has not been implemented, instead relying on post-design mitigation measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a disregard for the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more appropriate alternatives are available. The lack of a robust assessment of alternatives means it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly with respect to the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a material omission that contributes to the overall determination that the application has not undergone adequate scrutiny and thus 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 application presents significant flaws in its ornithological assessment, which is marked by considerable gaps in evidence and internal contradictions that severely undermine its conclusions. The west coast of the Isle of Lewis hosts internationally important seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not suffer adverse effects from the proposed development. It is crucial to note that the site is situated within key foraging areas and migratory pathways, yet the assessment fails to comprehensively evaluate the implications of potential displacement, collision risk, or habitat loss.

In a fundamental contradiction, the developer asserts that there will be no significant adverse effects, while simultaneously putting forward a Habitats Regulations derogation case, which is mandated only where significant harm is anticipated. This

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage presents significant deficiencies that undermine its credibility. Notably, the application overlooks the West Lewis coastline as a vibrant cultural landscape, wherein the environment, language, tradition, and community are interconnected. Instead of acknowledging the dynamic and ongoing significance of heritage, it adopts a limited perspective, viewing cultural sites merely as isolated and static entities.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet the assessment reduces them to mere static features without recognising their continuing use and importance within community life. This failure to accurately characterise these sites leads to an incomplete evaluation of the

cultural impacts and neglects their roles in the ongoing experiences of the community.

Moreover, the assessment disregards intangible cultural heritage, which encompasses the Gaelic language, traditions, and the community's long-standing relationship with the coastal environment. These elements are pivotal to the area's identity but have been entirely overlooked, indicating a major omission. The lack of consideration for these aspects renders the cultural impact of the proposed development impossible to fully comprehend.

Further complicating matters are concerns regarding community rights and engagement. The Gaelic-speaking population identifies with a distinct cultural identity that possesses characteristics associated with Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent undertaken, which raises serious questions about the engagement's legitimacy and violates accepted principles of participatory decision-making concerning cultural and environmental matters.

A significant procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, as mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic ramifications for the island community, which in itself is a substantial flaw.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, particularly regarding the preservation of historic assets and places. By neglecting both tangible and intangible heritage and failing to acknowledge living cultural practices, the application strays from established policy requirements.

In summation, the neglect of living heritage, intangible cultural values, community rights, and statutory duties culminates in a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not afford a reliable foundation for determining the actual cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the complete Social Impact Assessment raises serious concerns regarding the social impacts, health, and wellbeing of the community. Although the developer engaged local residents through focus groups, the absence of the full report creates a critical evidential gap that hinders public understanding and the competent authority's evaluation of the identified social risks. This lack of transparency not only undermines public trust but also obstructs proper scrutiny of the findings, which are vital for determining their significance in the decision-making process.

Available summaries show that residents are already experiencing significant stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts, rooted in direct community engagement, are concrete and not

speculative. Additionally, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these critical impacts have not been adequately integrated into the main application or considered with the seriousness they deserve. Consequently, withholding the full assessment obscures the true human and social costs associated with the development.

This lack of transparency further compromises the Environmental Impact Assessment process. For developments of such magnitude, it is essential to fully understand the social, economic, and health implications, especially when community character and functioning are at risk. The omission of the complete dataset within the application denies a comprehensive evidential basis for balancing potential benefits against the associated harms.

From a policy standpoint, the application fails to comply with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence suggests existing adverse effects that remain undisclosed. Without access to the full assessment, it is impossible to demonstrate compliance with this crucial policy.

The procedural ramifications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission constitutes a material failure within the application, breaching the evidential requirements mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This undermines the potential for a lawful determination and firmly indicates that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding the seascape, landscape, and visual impacts is significantly lacking, failing to adequately reflect both the extent of change and the sensitivity of the environment in question. The West Lewis coastline is characterised by its unspoilt open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. Should large-scale turbines be introduced near the shoreline, they would establish a continuous and overpowering industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application does not sufficiently convey the scale of visual changes that would occur. The size and close proximity of the turbines are such that they would overshadow views from residential areas, historic sites, and popular coastal locations. This situation would directly impact visual amenity, diminishing the intrinsic qualities of naturalness and remoteness that define the area. The assessment does not adequately express the severity of this impact or its significance within the context of such a

sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence suggests that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, particularly regarding key cultural heritage sites and landscapes of high value. This oversight raises the possibility that the magnitude of visual impact has been minimised, thereby undermining the reliability of the assessment process.

Another critical gap is the lack of evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these cultural assets as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape threatens to sever these important relationships, altering how heritage assets are experienced and disrupting their ties to the natural horizon. This scenario presents not merely a visual impact but a wider cultural and spatial harm that has not been thoroughly assessed in the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed emergency response procedures raises significant concerns regarding the proposal. By placing the responsibility for contingency planning at a post-consent stage, the application hinders the assessment of whether adequate measures will be in place to respond to pollution incidents. This introduces procedural risk and undermines the competent authority's ability to evaluate environmental protection strategies during the determination process.

Furthermore, the assessment of construction and pollution risks is inadequate, lacking the necessary detail to adequately evaluate the likely environmental effects. The project entails 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 depends on mitigation and contingency measures that are to be defined after consent is granted, which precludes any meaningful assessment of their effectiveness or suitability.

There is considerable uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without comprehensive modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty extends to the potential effects on sensitive marine species and habitats identified within the broader assessment context.

The application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills. However, it lacks sufficient detail regarding the methods that will be employed to prevent, control, or monitor these risks, which is particularly troubling given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disruption and contamination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation measures are evaluated before consent is granted, as the absence of such information renders a lawful determination unattainable. Moreover, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts creates a materially deficient assessment. These deficiencies inhibit a thorough evaluation of construction and pollution risks and strongly indicate 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 onshore infrastructure is fundamentally lacking and does not adequately address the full scope of impacts associated with what constitutes a single integrated project. The interconnected nature of the offshore turbines and onshore works is not reflected in the evaluation, which treats them separately, thereby obscuring the true extent of environmental and socio-economic consequences.

Significant onshore elements, including cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure, traverse sensitive landscapes. These undertakings involve excavations in areas of deep peat, particularly in Barvas Moor, a crucial carbon store and ecologically sensitive

habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or delaying the evaluation of onshore impacts, the application impedes a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the division between offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

The proposal raises additional serious concerns about sensitive habitats, such as machair systems and peatland environments, which are safeguarded by policy. The application does not convincingly demonstrate that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been put in place. This results in a significant evidential gap concerning biodiversity protection.

Furthermore, the disturbance of peatland poses a risk to carbon balance, as it releases stored carbon and could lead to a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this critical issue and fails to show that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land also introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, raising serious concerns regarding the project's deliverability and lawful implementation.

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

In summary, the fragmented approach to the project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism appeal. The proposal includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and disruptive “wall of light” effect that would drastically change the night-time environment.

This application fails to evaluate how such lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This neglect is

particularly troubling given the importance of dark skies to the local identity and the emerging tourism sector focused on astro-tourism. Consequently, there is a pronounced gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can cause disorientation and increase the risk of collisions. The application lacks any assessment of lighting impacts or a phototaxis study, failing to address how aviation lighting could affect these species or potentially raise mortality rates.

This issue is further compounded by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and its associated risks. For instance, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been assessed. The absence of site-specific night-time data leaves a crucial gap in understanding ecological impacts.

Without an assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse impacts. The standard of evidence required to exclude such adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the safeguarding of natural areas and environmental quality. Furthermore, it diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of night-time is an essential element of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its failure to meet the standards for sustainable development as required by statutory obligations, national policy, and evidential standards. This application echoes the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not adequately address these critical elements.

The evidential basis for the application is neither complete nor reliable. There are significant gaps in baseline data, the design envelope remains undefined, and the

mitigation measures proposed have not been specified. Furthermore, the assessment overlooks important impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete and fails to facilitate a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment violates statutory duties established by the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment represents a significant omission. These failures 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 addition, the proposal is in direct contradiction to National Planning Framework 4. It does not satisfactorily demonstrate the protection of biodiversity, natural areas, or cultural heritage, nor does it show that the health and wellbeing impacts are acceptable. The absence of modelling for tourism impacts further undermines any claim of net economic benefit. The cumulative impacts of both offshore and onshore components have not been thoroughly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this project remain uncertain and could be significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct the ability to make a lawful and evidence-based decision. Therefore, the competent authority must refuse consent based on these grounds or invoke appropriate regulatory provisions to compel the submission of the outstanding information.

For these reasons, a formal request is made to refuse 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: B6272A70

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 relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a review of the Environmental Impact Assessment Report and associated documents. It highlights significant deficiencies in planning, environmental assessments, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic coastline, near-pristine environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project in relation to statutory obligations, national policy, and sustainable development principles.

The application lacks sufficient evidential support for a lawful decision. Important environmental data is absent, baseline information is inadequate and inconsistent, and key details of the proposal remain unspecified. The flexible design framework employed complicates understanding of potential significant impacts, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the available documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or insignificant effects that lack robust backing.

There are evident and serious policy inconsistencies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the development's acceptability within policy frameworks.

This development's scale is unprecedented for the area, with large turbines proposed near the shoreline, raising significant issues about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on vague mitigation measures, evidential shortcomings, and clear policy violations indicates that the application is incomplete and unfit for lawful consideration. Given these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and lacks a comprehensive, transparent, and dependable evaluation of the potential

environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This approach compromises the integrity of the assessment, meaning that the impacts described may not accurately reflect the final development, thus hindering both public understanding and that of the competent authority regarding the true scale of environmental effects.

Moreover, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans that have yet to be established. Consequently, consent is sought on the premise that environmental damage will be rectified later, obstructing any substantial evaluation of efficacy or assessment of remaining impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigations are clearly outlined prior to any decision-making.

Additionally, there are serious evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This generates uncertainty regarding the magnitude and significance of impacts, particularly when negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear comprehension of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This activates the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it cannot be evidenced that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an ambiguous design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies inhibit a lawful and robust appraisal of environmental effects, leaving the competent authority incapable of making an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives lacks the necessary depth and does not fulfil the requirements of the Environmental Impact Assessment regime. Instead of offering a detailed comparison of realistic alternatives based on their environmental impacts, the application merely presents a narrative of how the project has developed. This method fails to show that less harmful options have been adequately identified, evaluated, and chosen over more damaging alternatives.

There is no clear or evidence-based examination of alternative offshore sites, development sizes, or design configurations. Notably, the application does not indicate that the developer has seriously considered positioning the turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact, the lack of such analysis prevents any assertion that the proposed location is the least damaging available.

These shortcomings also affect the evaluation of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately investigated to prevent or lessen effects on sensitive areas. This includes significant sites such as Barvas Cemetery, which hold cultural and spiritual importance. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation through design has not been implemented, relying instead on measures to mitigate after design has been completed.

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

From a policy standpoint, this inadequacy challenges adherence to National Planning Framework 4, especially concerning 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 properly assessed and cannot be deemed lawful.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly flawed, lacking a comprehensive understanding of ecological receptors within the West Lewis coastal environment. This area is a sensitive and biologically rich marine system, yet it is evident that the baseline data provided is incomplete. The methodologies employed do not adequately capture crucial information regarding species presence, behaviour, and habitat utilisation, leading to an unreliable evidential basis for evaluating potential impacts.

One notable gap in the assessment pertains to otters, classified as a European Protected Species. The application does not properly acknowledge or evaluate their active use of coastal regions for foraging and movement. By failing to consider their core foraging range and behavioural habits, the assessment inadequately addresses the potential impacts of construction-related disturbances, noise, and increased activity, undermining any assertions regarding the absence of significant effects on this species.

Further issues are apparent in the evaluation of basking sharks, where a reliance on aerial surveys introduces substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations, which indicate a frequent utilisation of these waters. The oversight of relevant data leads to an incomplete baseline, diminishing the reliability of the conclusions drawn.

Due to these methodological shortcomings, the conclusions that suggest negligible or non-significant effects appear to be based on assumptions rather than strong evidence. Additionally, the lack of adequate baseline data hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates a level of uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to align with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not appropriately identify or assess protected species. This introduction of uncertainty prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of ornithology associated with this application reveals critical flaws, characterised by internal inconsistencies and notable gaps in evidence. 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 provide the necessary evidential support to demonstrate that these species will remain unaffected. It is noteworthy that the development is situated in key foraging areas and along migratory pathways, yet the implications of potential displacement, collision risk, and habitat loss have not been thoroughly evaluated.

There is a significant contradiction within the application, as the developer asserts that there will be no significant adverse effects while simultaneously preparing a Habitats Regulations derogation case, which typically implies that significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions are not substantiated by the available evidence. Furthermore, the assessment lacks sufficient evidence regarding the impact on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is inadequately recognised, and the modelling

approaches used introduce uncertainty, particularly concerning species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses of these species are not completely understood.

The positioning of turbines within a recognised migratory corridor introduces further risk, creating a barrier within a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not provide an adequate assessment of the long-term consequences of sustained mortality within this corridor or consider the potential effects on species with relatively small global populations.

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

Additionally, the identified deficiencies signify a failure to comply with National Planning Framework 4, particularly concerning 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.

In conclusion, the assessment is rendered unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These failings hinder a thorough evaluation of impacts and contribute to the overall finding that the application does not satisfy 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 developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not resulted in the publication of the full report. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified in the developer's own research.

Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement and are therefore grounded in fact, rather than speculation. However, the lack of access to the full assessment restricts proper scrutiny of the findings, limiting the capability to ascertain their significance in the decision-making process.

The proposal is also perceived as a direct threat to community identity and cohesion, with findings from the developer indicating a risk of "cultural loss." Despite this, such

impacts have not been sufficiently incorporated into the main application or given due consideration. Consequently, the withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency 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 may be at stake. The failure to provide the complete dataset results in an incomplete evidential basis necessary for assessing the balance between benefits and detriments.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the available evidence indicates adverse effects that remain undisclosed. Therefore, without the full assessment, compliance with this policy cannot be established.

The procedural ramifications are significant, as the competent authority is unable to carry out a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a material failure within the application and does not meet the evidential requirements set forth by the Environmental Impact Assessment regime.

Ultimately, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This situation precludes a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking and does not adequately account for the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would establish a dominant industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

This application fails to accurately convey the magnitude of the visual change that would ensue. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the intrinsic qualities of naturalness and remoteness. There is a notable shortcoming in how this impact is presented, failing to reflect its significance within such a sensitive landscape.

There are also serious methodological issues concerning the chosen visual viewpoints.

Evidence indicates that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises concerns that the magnitude of visual impact may have been understated, compromising the reliability of the assessment.

Additionally, the assessment does not adequately consider the interconnected nature of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected visually and spatially to the Atlantic horizon. The assessment treats these assets as isolated rather than acknowledging their interdependence, leading to an incomplete understanding of impacts on their context and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their link to the natural horizon. This results in not just a visual impact but a wider cultural and spatial detriment that the application has not sufficiently evaluated.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural landscapes and historic assets. The level of change proposed is inconsistent with the imperative to preserve landscape character, visual amenity, and the context of culturally significant sites. Moreover, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy guidelines.

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

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and underscore the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is materially deficient, lacking the necessary detail to evaluate likely environmental effects. The proposal necessitates extensive seabed preparation and installation works within a high-energy Atlantic environment. However, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated post-consent, which hinders any meaningful assessment of their adequacy or effectiveness.

The 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. 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.

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

The absence of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate 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 determination stage.

From a regulatory standpoint, the deferment of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to consent, and the absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts collectively render the assessment inadequate. These deficiencies inhibit a robust evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life as presented in the application is inadequate and lacks a thorough examination of ecological and socio-economic implications. The West Lewis coastal waters are home to a rich marine ecosystem and support a vibrant fishing industry. However, the application fails to prove that these vital uses and habitats can be preserved or maintained without causing significant disruption.

A major concern is the premise that fishing activities can be relocated without repercussions. The application lacks evidence to demonstrate that alternative fishing grounds are available, accessible, or capable of accommodating the additional pressures that may arise. This gap is critical, as such displacement could lead to overfishing in other areas and may adversely affect the local fishing fleet's economic stability. Without a robust, evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over considerable distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is troubling; nevertheless, the application diminishes the importance of these potential effects without adequate supporting evidence.

Moreover, there exists a notable contradiction within the application, where the necessity for licenses to permit harm to European Protected Species is recognised, yet the impacts are simultaneously categorised as negligible. This inconsistency undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, especially where harm is expected to an extent that requires legal approval.

Additionally, the assessment does not adequately address cumulative impacts stemming from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a detailed evaluation of these collective effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, the application fails to show adherence to the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with current marine users or avoid detrimental impacts on marine biodiversity, thereby precluding any conclusion that the proposal is sustainable.

In summary, the combination of insufficient evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies results in an assessment that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in the environmental quality, cultural identity, and tourism potential of the area. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment. This aspect has not been assessed in the Environmental Impact Assessment, representing a material omission that undermines the application.

The impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors has not been evaluated. Such an omission is particularly significant given the importance of dark skies to the region's identity and to emerging sectors like astro-tourism. The failure to address these impacts results in a considerable gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species are particularly affected by artificial lighting due to phototaxis, leading to disorientation and increased risks of collision. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species, and the resultant increase in mortality, have not been considered.

This shortcoming is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet the application does not assess this risk. The lack of site-specific night-time data leaves a critical gap in understanding the ecological impacts.

Without a proper assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites would suffer adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, these omissions conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. This failure also undermines 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 for 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.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its adherence to the principles of sustainable development, failing to meet statutory duties, national policy, and evidential standards. It mirrors the critical issues that were present in the 2008 refusal of the Lewis Wind Power proposal, where the scale of proposed industrialisation was deemed unacceptable. Despite being put forward under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not adequately address these vital areas.

Key deficiencies characterise the evidential basis for determination. The baseline data is notably incomplete, and there is an unresolved reliance on an undefined design envelope. The proposed mitigation measures lack specification, and there is a concerning omission of essential impact pathways, which includes the effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism impacts. This results in an Environmental Impact Assessment that is insufficient, leaving a lack of

clarity on significant effects or residual impacts.

Moreover, procedural oversights are evident throughout the application process. The failure to conduct a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the omission of the full Social Impact Assessment is a material deficiency. These shortcomings hinder the competent authority's ability to evaluate potential effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal also stands in direct opposition to the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural landscapes, or cultural heritage, fails to ensure acceptable health and wellbeing impacts, and lacks evidence for net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impacts of offshore and onshore elements have not been thoroughly examined, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project are uncertain and could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent at times. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and precluding a lawful determination that impacts are acceptable.

Substantial and irreversible alterations to a highly sensitive landscape would also result from the proposal. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual relationships, and adverse impacts on tourism indicate permanent consequences that cannot be mitigated to an acceptable extent.

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

Consequently, 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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