

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: New Letter Submission - MD- 00011742 | MD- 00011743
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Email: [REDACTED]

Date: 6th May 2026

To:

Marine Directorate – Licensing Operations Team
Marine Laboratory
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United Kingdom

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

Dear Sir/Madam

I am writing to formally object to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. This objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. This development, situated off the west side of the Isle of Lewis, is within an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of the proposal, coupled with its proximity to the shoreline, raises substantial concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful decision. It is evident that critical environmental data is absent, with baseline information being both limited and inconsistent. Key elements of the proposal remain undefined, and the reliance on a flexible design framework obstructs a clear understanding of potential significant effects. Moreover, the mitigation measures mentioned are not clearly outlined, rendering any assessment of their effectiveness impossible. Consequently, the provided documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are notable and serious policy conflicts inherent in the proposal. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not convincingly demonstrate its compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and compromise the competent authority's ability to determine the development's acceptability within policy frameworks.

The unprecedented scale of this proposal introduces significant apprehensions regarding landscape capacity, visual dominance, and environmental consequences. Large turbines positioned in close proximity to the shoreline amplify these concerns. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and incapable of sustaining a lawful determination. Given these circumstances, it is essential that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to provide an adequate understanding of the ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species. Consequently, the assessment fails to establish a sound evidential basis for evaluating potential impacts.

A significant gap in the assessment pertains to otters, classified as a European Protected Species. The application neglects to properly recognise and evaluate their active utilisation of coastal areas for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects arising from construction disturbance, noise, and increased activity. This oversight compromises the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks suffers from methodological shortcomings, particularly the reliance on aerial surveys which introduce notable detection bias under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline and diminishes the reliability of the conclusions made.

These methodological deficiencies result in conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings prevents a definitive exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of 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 renders the assessment unreliable. These issues obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application proposes a development that poses risks to the west coast of the Isle of Lewis, a region supporting internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is materially flawed, exhibiting significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. It fails to convincingly demonstrate that these species will not be adversely affected, particularly as the development is situated within key foraging areas and migratory pathways. The assessment does not adequately evaluate critical factors such as displacement, collision risk, or habitat loss.

A fundamental contradiction arises within the application, as the developer asserts that there will be no significant adverse effects while simultaneously making a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the evidence presented. The assessment lacks sufficient proof that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore, it does not adequately address the significance of these feeding grounds, and the reliance on modelling approaches introduces uncertainty, especially for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is incomplete and behavioural responses are not thoroughly understood.

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

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to determine no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

accurately capture the scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed installation of large-scale turbines in proximity to the shoreline would create a continuous and significant industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application falls short in conveying the magnitude of the visual change. Given their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently represent this level of impact or its significance in the context of such a sensitive landscape.

There are also concerns regarding the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully depict the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This shortcoming suggests that the magnitude of visual impact may be understated, undermining the reliability of the assessment.

A significant gap exists in the evaluation of the interconnected relationships among landscape, seascape, and cultural heritage. Prominent sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework, linked by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these sites as isolated, failing to acknowledge their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The extent of the proposed changes is inconsistent with the obligation to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is also apparent 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 change is fundamentally 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 reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient, lacking the necessary detail to adequately evaluate the likely environmental impacts. The proposed

development entails extensive seabed preparation and installation activities within a high-energy Atlantic environment. However, the application fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be formulated after consent, which inhibits a meaningful evaluation of their sufficiency or effectiveness.

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

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the current application does not adequately protect these vital habitats or activities, nor does it provide a thorough assessment of the ecological and socio-economic impacts.

A major concern is the assumption that fishing can be relocated without any negative effects. The application lacks evidence showing that alternative fishing grounds are available and can handle additional strain. This is a crucial gap, as displacing fishing activities could lead to overfishing in other areas and harm the local fishing economy. Without a solid, evidence-based evaluation, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

The proposed development also poses serious risks to marine life, especially due to the

underwater noise produced during construction. Extended periods of high-energy hammer piling are expected to disturb marine species over large distances, particularly dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is troubling. However, the application tends to minimise the importance of these disturbances without adequate supporting evidence.

There exists a clear contradiction within the application regarding the need for licenses to harm European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency undermines the reliability of the assessment and raises questions about compliance with the Habitats Regulations, especially when anticipated harm might necessitate legal permissions.

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

From a policy standpoint, the application does not prove adherence to the National Planning Framework 4 or the National Marine Plan. It falls short of demonstrating that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, obstructing any conclusion regarding its sustainability.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly lacking and does not fully address the impacts stemming from what constitutes a single integrated project. The interconnection between the offshore turbines and the onshore works is clear, yet these elements are evaluated in isolation, leading to a fragmented analysis that diminishes the understanding of the overall environmental and socio-economic implications.

Included in the onshore components are cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly on Barvas Moor, which serves as an important carbon reservoir and an ecologically significant habitat. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs the proper assessment 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 effects on peatlands, habitats, and local communities.

Additionally, there are considerable risks to sensitive habitats, including machair systems and peatland environments, both of which are protected by policy. The application does not adequately demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant evidential gap concerning biodiversity protection.

The proposal further raises serious concerns regarding carbon balance. Disturbance of peatland results in the release of stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this concern and fails to show that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure across active croft land presents potential conflicts with existing land use and legal rights. There is no evidence within the application that necessary consents or processes have been initiated, which raises doubts about the feasibility and lawful execution of the proposal.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, crucial for environmental quality, cultural identity, and tourism, particularly in the context of emerging sectors like astro-tourism. The proposed project introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive “wall of light” effect on the western horizon that would drastically change the night-time environment.

The application does not evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors, despite the critical nature of dark skies to the area’s identity. This failure represents a notable gap in the overall landscape and environmental assessment.

Moreover, there is a lack of evaluation concerning the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to their phototaxis, which can result in disorientation and a heightened risk of collision. The absence of a lighting impact assessment or phototaxis study means that potential effects on these species and their mortality rates have not been assessed.

This issue is further exacerbated by reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The lack of site-specific night-time data creates a serious gap in understanding the ecological impacts.

Without a proper assessment 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 is not met, which engages the precautionary principle and hinders a lawful determination.

From a policy perspective, this omission contradicts National Planning Framework 4

concerning the protection of natural places and environmental quality. Additionally, it diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is an essential part of the ecosystem.

Overall, the lack of evaluation concerning dark skies and nocturnal wildlife presents 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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm stands as a clear failure to meet the standards of sustainable development, as established by statutory obligations, national policy, and evidential criteria. It mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

A complete and reliable evidential basis for determining this application is lacking. There are significant gaps in baseline data, and the use of an undefined design envelope raises concerns. Additionally, the application relies on unspecified mitigation measures and fails to address critical impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a full understanding of likely significant effects and residual impacts.

Procedural failures are also evident in this application. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment constitutes a material omission. These shortcomings inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal is in direct opposition to National Planning Framework 4, as it does not adequately protect biodiversity, natural environments, and cultural heritage. It has not demonstrated that health and wellbeing impacts are acceptable, nor can it prove a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, coupled with conflicts with policy and

unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or utilise relevant regulatory provisions to require the submission of the necessary missing information.

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

Yours faithfully,

A solid black rectangular box used to redact the signature of the sender.

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