

Member of Public 2335

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: MD-00011742 & MD00011743 Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis
Date: 04 May 2026 23:28:36
Attachments: [Objection spiorad na Mara App ref 00011742 and 00011743.pdf](#)

Dear Licensing Operations Team,
Please find my objection to the Spiorad na Mara Wind Farm MD-00011742 & MD-00011743 attached.

Thank you for your consideration.
Best wishes

[REDACTED]

Sent from [Outlook](#)

FORMAL OBJECTION TO THE SPIORAD NA MARA OFFSHORE WIND FARM

To: Marine Directorate Licensing Operations Team Re: Section 36 Consent Application — Spiorad na Mara Offshore Wind Farm Application references: 00011742 & 00011743

[REDACTED]

I live on a croft in the village of [REDACTED] on the westside of Lewis, Shawbost being one of the worst affected villages in terms of visual impact of this project. I am an ecologist who works for Woodland Trust Scotland and I have spent my entire life caring about the natural world. I believe in the urgent need to address climate change and the biodiversity crisis and the importance of climate decarbonisation. I also believe that the unprecedented scale and proximity to shore of this project will cause too much harm to the incredibly important ecosystems, protected species and cultural assets of the area to justify its renewable energy generation, and I am writing to formally object to it.

I am also a Gaelic learner, immersed in the language and the culture of the westside of Lewis. I have the privilege of living in the last place on earth where Scottish Gaelic is spoken as a majority language in the villages around me. It is the language of my neighbours, my friends, the people I row with. I am very lucky to be immersed in the culture of language of the crofting villages here.

I am a member of An Eathar Rowing Club. I am a recreational user of the sea off the westside of Lewis, this is the stretch of water in which this development is proposed. From the water, I have watched basking sharks, dolphins and minke whales. I have seen otters foraging on the rocks at Dalbeag Beach and in the sea at Port Mòr in Bragar.

Objection Point 1. THE SITE SELECTION PROCESS WAS DEMOCRATICALLY FLAWED

(Legal basis: NPF4 Spatial Principle of Just Transition; NPF4 Policy 11; Scotland's National Marine Plan GEN 18 and GEN 19; Islands (Scotland) Act 2018)

The N4 site and the seabed on which this project is proposed, was included in the first Draft Sectoral Marine Plan for Offshore Wind Energy on the basis of a consultation response from Comhairle nan Eilean Siar that claimed the community of Lewis strongly supported offshore wind development at this location. That consultation took place during Covid, and I've yet to meet anyone who was aware of that consultation, even Councillors. The Marine Directorate accepted the Comhairle's assertion without any evidence to support their claims.

The community on the westside of Lewis was never asked whether they supported this development. A recent survey by campaign group, Eilean mo Ghaoil, found that 88% of respondents oppose it. I have asked the group about their survey methodology, the results were 'scrubbed' to only allow one response per Western Isles IP address. This is the most accurate way to ensure that responses come from a particular area and that there are no repeat responses.

The Comhairle's response (279771074) stated,

*It is noted that DPO N4 is located relatively close to shore and may present a relatively higher visual impact than other DPO's. Notwithstanding, the Comhairle urges Marine Scotland to retain and promote DPO N4 because of its accessibility and wind resource and **the requirement for developers in DPO N4 to connect to Grid infrastructure on Lewis**. The Isle of Lewis is currently host to circa 450MW of consented and contracted Onshore Wind generation, awaiting connection to the National Grid by a £700m HVDC Radial Connector. The local population has accepted the considerable visual impact of these Onshore deployment on the tacit understanding that the next generation of energy production will be in the marine environment. **The local population is therefore prepared for, and supportive of, large scale deployment of Offshore Wind off Lewis and has not reacted negatively to the potential visual impact in the way other coastal regions in Scotland have.***

*Associated to this is the ongoing debate around the proposed HVDC Radial Connector which our Transmission Owner, Scottish Hydro Electric (Transmission), is required to provide by 2025 in order to connect consented Onshore Wind installations to Grid. At present, circa 450MW of commercial and community Onshore Wind is consented and contracted to Grid and OFGEM have indicated that, without further demand, they propose to approve a 450MW link as opposed to the next size up, 600MW. A 450MW link will lock out future connections for community owned Onshore Wind and conventional or floating Offshore Wind so it is important that the case is made now for the larger 600MW link. Also, because generators pay Transmission Charges proportionate to the amount of cable capacity they take up, a 450MW cable renders island Wind Farms non-viable. A 600MW link enhances the viability of current and future connections, including Offshore Wind. **To help make the case of the larger 600MW link, the Comhairle urges Marine Scotland to retain and promote DPO N4 but also DPO's N2 and N3 which have capability for local connection and supply chain support.***

Ofgem has since approved a 1.8 gigawatt interconnector for Lewis, three times the capacity that the Comhairle was lobbying for. The scale of that infrastructure only makes economic sense if the capacity was based on this wind farm proceeding. This is before any planning application was submitted and before any community engagement had taken place. A Public Inquiry is necessary to ascertain how this came about.

NPF4 requires that engagement with communities be early, meaningful and collaborative. Scotland's National Marine Plan GEN 18 requires that engagement be undertaken as early as possible. GEN 19 requires that decisions be based on sound socio-economic evidence. None of these requirements were met at the stage when the decision on whether to include N4 in the Sectoral Marine Plan was made. By the time the planning application was submitted, the community was already being presented with a done deal. People in the community have lost faith in planning processes and have been saying that N4 is a 'done deal' for two years.

Objection Point 2. THIS LOCATION IS WRONG AND THE SCALE IS WITHOUT PRECEDENT

(Legal basis: Schedule 9, Electricity Act 1989; NPF4 Policy 4; Habitats Regulations 1994; Conservation of Offshore Marine Habitats and Species Regulations 2017)

The Lewis Peatlands Special Protection Area's qualifying red-throated divers forage in the inshore waters directly in front of the proposed array area.

The Red-necked Phalarope uses Loch na Milne, the RSPB site in Arnol, right near the Arnol Blackhouses. This is one of the UK's most endangered birds with 30 breeding pairs occurring only in Shetland and Lewis. Its migration route to North America goes straight through the array area. The Red-necked Phalarope is listed under Schedule 1 of The Wildlife and Countryside Act.

The world's largest gannet colony at St Kilda, 100 kilometres away, feed in these waters. The westside of Lewis is the primary departure and arrival corridor for Iceland-bound migrants: whooper swans, pink-footed geese, barnacle geese, redwings, species whose total global populations are small enough that sustained turbine mortality over 35 years would be measurable at the population level.

I have recorded corncrakes, lapwings, golden plovers and curlews on my own croft. These are Red-listed species, Species of Principal Importance under the Nature Conservation (Scotland) Act 2004, whose presence on the westside is directly linked to the low-intensity crofting practices that have sustained this landscape for generations. The EIAR does not assess the impact of this development on these terrestrial populations. Ignoring that many of these populations migrate through the territory of the proposal.

Schedule 9 of the Electricity Act 1989 requires that the applicant shall have regard to the desirability of preserving natural beauty and conserving flora and fauna of special interest. The unprecedented scale of this development makes any modelled assessment of its cumulative effects on the wildlife of this coastline inherently uncertain. The law demands a precautionary approach and the EIAR fails to apply one.

Objection Point 3. THE LIVING GAELIC CULTURE, THE RIGHTS OF CROFTERS AND INTANGIBLE CULTURAL HERITAGE

(Legal basis: NPF4 Policy 7; Historic Environment Policy for Scotland; UNESCO Convention for the Safeguarding of Intangible Cultural Heritage; IFC Performance Standard 7; Islands (Scotland) Act 2018; Crofters (Scotland) Act 1993)

I am learning Gaelic because the language speaks of the place I live, one of the last places on earth where it is in daily use. The villages of Siabost, Bragar, Arnol, Barabhas are communities where Gaelic is the living vernacular of ordinary daily life, transmitted from generation to generation without interruption.

That language is inseparable from this landscape. The oral traditions, the place names, the seasonal practices, the relationship between these communities and the sea to the west of them are the living expression of a culture that has persisted in this specific place for as long as recorded memory extends. The EIAR does not assess any of this. Its cultural heritage chapter addresses scheduled monuments and listed buildings but does not address the living Intangible Cultural Heritage of the indigenous community living beside them.

My father was buried at Chladh Dail Mòr, Dalmore Cemetery by the men of Shawbost village. The community came together, as it has done for generations, in a Gaelic-speaking act of communal mourning, in a cemetery that looks out to sea. The turbines will be visible from that cemetery during every such burial for the next 35 years. The EIAR assesses the visual impact on Dalmore Cemetery as a scheduled monument but ignores it as a living burial site, in active community use, whose significance cannot be separated from the seascape it faces.

I have taken photographs of Teampall Eoin at Port Mòr in Bragar (attached) that show the chapel, the cemetery, and the wider seascape in which they sit. The applicant's own photomontage for this site was taken looking away from the sea. I have also taken photographs of the Arnol Blackhouses that show the extent to which the sea is integral to the appreciation of those buildings and their landscape. The relationship between the

blackhouses and the western horizon is central to its cultural significance. The applicant's assessment does not engage with this relationship.

Crofting is the material foundation of this culture. The common grazings, the seasonal rhythms of the crofting year, the shared labour and shared land that structure community life on the westside are not separable from the Gaelic language and culture that the EIAR has failed to assess. The Gaelic-speaking communities of the west coast of Lewis meet the internationally recognised definition of Indigenous Peoples under IFC Performance Standard 7 and the UN Declaration on the Rights of Indigenous Peoples. Their Free, Prior and Informed Consent has not been sought. The 88% opposition figure is the clearest possible evidence of that.

NPF4 Policy 7 requires that the assessment identify the likely visual impact of proposals for change, based on an understanding of the cultural significance of historic assets.

Objection Point 4. THE IMPORTANT MARINE MAMMAL POPULATIONS OF THESE WATERS

(Legal basis: Conservation (Natural Habitats &c.) Regulations 1994; Conservation of Offshore Marine Habitats and Species Regulations 2017; Wildlife and Countryside Act 1981; Scotland's National Marine Plan GEN 13; ASCOBANS)

I have seen minke whales from the cliffs above Dalbeag. I have watched basking sharks from the South Shawbost cliffs and from the water, as a member of An Eathar Rowing Club. I have photographed otters foraging on the rocks at Dalbeag Beach and at Port Mòr in Bragar. These are repeated, seasonal occurrences in waters that the Scottish Government's own scientists have called probably the richest marine mammal habitat in the UK.

The Inner Hebrides and Minches Special Area of Conservation, the largest harbour porpoise SAC in Europe and The East Lewis Marine Protected Area for Risso's dolphin lie adjacent to these waters. The developer's own figures predict disturbance to nearly 10% of the Risso's dolphin management unit population and over 27% of the local bottlenose dolphin population from construction noise alone, yet classifies these effects as 'not significant'. As an ecologist, I find that conclusion extraordinary. It is not consistent with the evidence the applicant presents, and it is not consistent with the beyond-reasonable-scientific-doubt standard that the Habitats Regulations require.

In July 2023, 55 long-finned pilot whales stranded on Traigh Mhòr at North Tolsta. Fifty-four died. It was a devastating day for this community. The Scottish Government's investigation could not rule out anthropogenic contribution. Geophysical surveys for this project were taking place in the lease area at the time, with vessels operating to the west of Lewis. We are being asked to approve an industrial development of unprecedented scale in the waters where that happened, on the basis of an assessment that predicts significant harm to protected species and then classifies it as acceptable. It is not acceptable.

The otters I have watched at Dalbeag and Port Mòr are not assessed anywhere in the EIAR. The European otter is a European Protected Species. Its presence along this coastline, at named locations, confirmed by local observation, by social media photographs and by the Barvas Estate Game Keeper, [Redacted], is a matter of record. The EIAR contains no otter survey, no otter assessment, and no otter mitigation.

NatureScot's own standing advice requires a survey for any development within 200 metres of suitable habitat. This application does not comply with that guidance.

Objection Point 5. THE SOCIAL IMPACT ASSESSMENT HAS BEEN DELIBERATELY DEFERRED UNTIL AFTER CONSENT

I participated in the applicant's focus group process, conducted by Atlantic58 in summer 2024.

Following submission of this application, I contacted the applicant to enquire about the Social Impact Assessment (SIA). In response, the applicant's representative confirmed in writing:

"Instead of being included in the Environmental Impact Assessment Report (EIAR), which forms part of our planning application, the SIA will now be completed and published after the consenting process. This is to allow findings from the EIA and the outcome of the consenting process to inform the completed SIA."

This means that Scottish Ministers are being asked to grant Section 36 consent for a major infrastructure project, one that will affect communities across the west coast of Lewis for a minimum of 35 years, without a completed Social Impact Assessment.

Findings submitted in Appendix 6.2 as part of the EIAR, present significant social impacts:

- Loss of trust in relation to the Scottish Government and developers and a sense that the community has little influence.
- Mental health impacts that are already being experienced.
- Gaelic culture and community identity at risk.

I was told that my contribution would inform the developer's assessment and that the SIA would be submitted with their application. I can only assume that they are wanting to suppress their findings.

MY RESPECTFUL REQUEST

I have written this objection as an ecologist, as a Gaelic learner, as a sea user, as a crofter. I have tried to be specific, to be grounded in evidence, and to be honest about what I know from direct experience of this place. I've spent the last two years researching this project to submit a considered response. The application documents were overwhelming to say the least, they filled a whole room at Horshader Community Development. If I had longer, I'm sure there would be many more points to raise.

There is nowhere else in the world quite like the westside of Lewis and I've lived in many places. The convergence of ecological richness, cultural depth, linguistic uniqueness and landscape beauty that characterises our quiet crofting villages along this coast, is the reason why I chose this place as my home. I feel completely devastated at the thought of this development going ahead and I'm really unsure as to whether I could stay here if it did and that breaks my heart.

The planning process exists to weigh these consequences honestly before irreversible decisions are made. The EIAR submitted with this application does not do that. It photographs heritage sites looking away from the development. It omits the otter and Red-necked Phalarope entirely. It predicts significant harm to protected marine mammals and calls it not significant. It defers the Social Impact Assessment until after consent. It was

submitted during lambing season and during an election campaign. And it rests on a site selection process that accepted, without evidence, an assertion of community support that 88% of the affected community has since contradicted.

I respectfully urge Scottish Ministers to refuse this application.

4 May 2026.

I wish to have any representations of my objection kept anonymous.



Plate 3-1 Looking south at the remains of Teampull Eoin (SM3926)



Teampall Eoin and Cladh Bragar (Bragar Cemetery) are visible in the bright green square to the right of the image below, showing the context of the monument and cemetery within the wider landscape and seascape facing west.

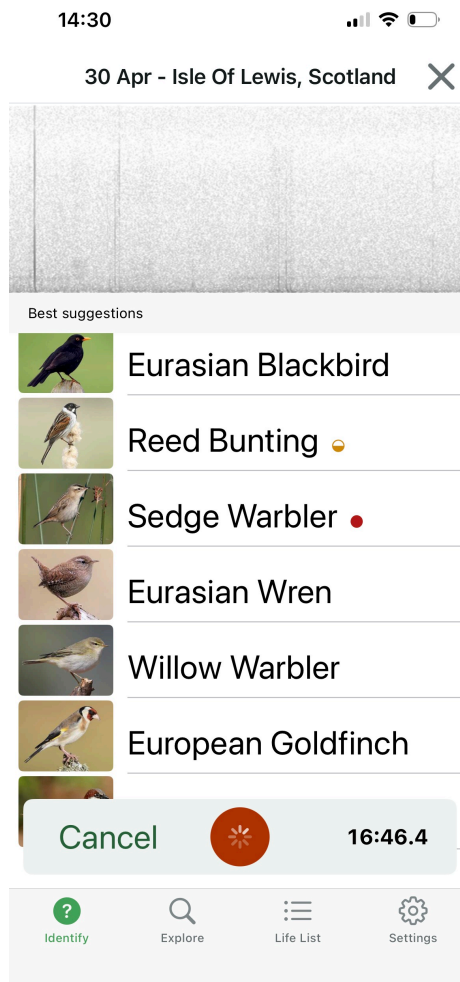
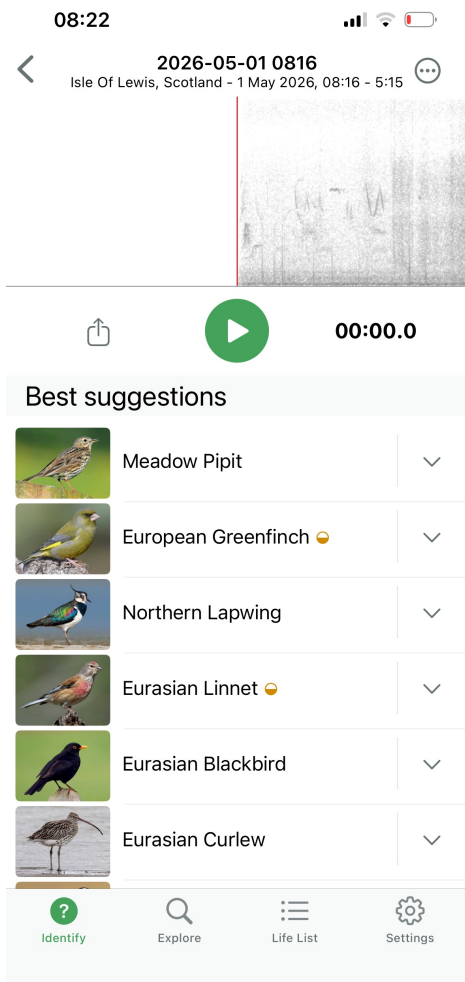




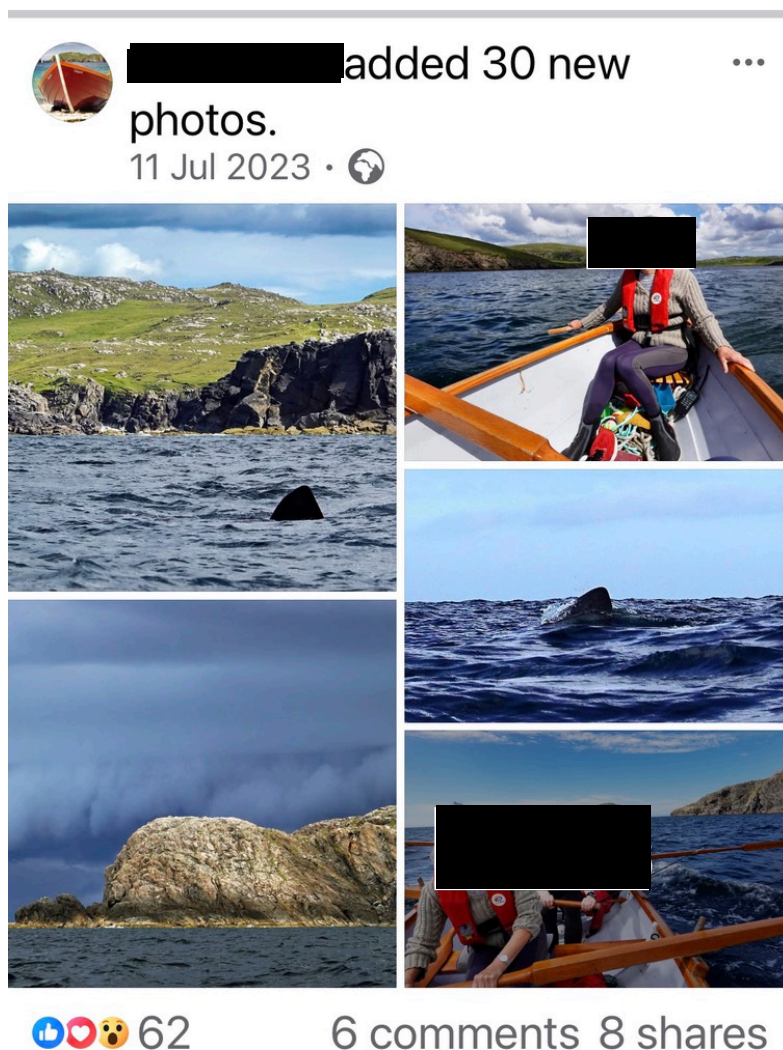
Within the cemetery with Teampall Eoin to the right.



Arnol Blackhouses on both sides of the road with a wide aspect of the Atlantic horizon.



Some of the birds recorded on my croft with the Merlin App and a basking shark off Gearranin with An Either rowing Club.



From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 04 May 2026 21:08:02

I formally object to the above application as it contravenes the following planning policies and guidance:

Lack of Community Engagement: There was no consultation with the communities of west Lewis before Crown Estate Scotland identified and leased the N4 area for development. The plan was imposed on them without consent.

Scotland's National Marine Plan (NMP) GEN 18 'Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.'

NMP Para. 4.77 'Engagement with the public and other stakeholders should be appropriate, proportionate and meaningful. It should be undertaken as early as possible in planning and consenting processes.'

NPF4 Spatial Principles - Just Transition. 'We will empower people to shape their places.'

Lack of understanding of Cultural Significance: The EIAR makes no reference to the personal, cultural or historical attachment of the population of Lewis to their landscape and heritage, and fails to assess impacts on the living intangible heritage of the Gaelic community. Until a full assessment addressing impacts on Gaelic language and culture, community wellbeing, and west Lewis communities' relationship with their coastline is completed and publicly consulted upon, this application cannot lawfully be determined.

NMP Para. 4.20 'The historic environment includes all aspects of the environment resulting from the interaction between people and places through time.'

NPF4 Policy 7 a 'Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place.'

Significant Adverse Impacts on Protected Birdlife and Habitats: The development occupies primary foraging grounds for the Lewis Peatlands SPA red-throated divers, falls within the foraging range of the St Kilda gannet colony, and crosses a principal UK migratory corridor for protected species, including whooper swan and pink-footed goose. The EIAR fails to adequately assess the threats of collision, displacement, and barrier effects to these declining populations. Thus, consent would breach the Conservation (Natural Habitats &c.) Regulations 1994, the 2018 Offshore Regulations, the Marine (Scotland) Act 2010, and the Wildlife and Countryside Act 1981, as the proposal is likely to adversely affect the integrity of the following SPA's: Lewis Peatlands, West Coast of the Outer Hebrides, Seas off St Kilda and St Kilda.

NPF4 Policy 7 l 'Development proposals affecting a World Heritage Site or its setting will only be supported where their Outstanding Universal Value is protected and preserved.'

NPF4 Policy 11 e ix Impact on 'biodiversity including impacts on birds' must be addressed.

Failure to Protect the Integrity and Setting of Scheduled Monuments: The EIAR anticipates significant adverse effects on coastal heritage. It fails to assess the impact on key scheduled monuments such as SM13786. The proposal would harm the Calanais monuments and wider historic landscape by introducing an industrial horizon into their natural surroundings, fundamentally undermining the meaning, experience, and interconnected setting of these sites, directly conflicting with NPF4 Policy 7. There are many alternative sites for offshore wind development and no reasons of over-riding public interest for choosing this site.

NMP Para. 4.22 'Marine planning should help to ensure that future marine activities and developments can be carried out in a way that respects the marine historic environment and the setting of important coastal heritage assets.' Para. 4.23 'Designated assets should be protected in situ within an appropriate setting'.

NPF4 Policy 7 h 'Development proposals affecting scheduled monuments will only be supported where: ii 'significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or iii exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.'

Unassessed Onshore Impacts and Breach of Statutory Rights of Crofters: Granting offshore consent while onshore impacts on irreplaceable machair and deep peatland remain unassessed, directly contravenes NPF4 Policy 3, which requires biodiversity (including irreplaceable habitats) to be left in a demonstrably better state. In addition the proposal fails to engage the statutory rights of crofters under the Crofters (Scotland) Act 1993. NMP Para. 4.77 'There should be a presumption in favour of publicising applications for marine and terrestrial components of a development together during consenting processes.'

Irreparable Harm to the Tourism Economy and Coastal Character: The Spiorad na Mara wind farm would permanently industrialise the unspoiled coastal scenery and dark skies on the Isle of Lewis, destroying the very qualities that attract visitors to the island. Local residents have consistently warned during consultation that this visual impact would decimate the tourist industry on which so many islanders depend. Tourism is built on the area's landscape, seascape, heritage, nature, and dark skies. This development risks long-term damage to local businesses and the wider economy, contrary to NPF4 Policy 30.

NMP, Para. 12.28 'An unspoiled environment, high quality landscape and a sense of closeness to nature are important to many people. Scenery and environmental quality are key factors in attracting visitors to Scotland's coasts.'

Community Opposition and lack of Community Empowerment: The Community Opinion Survey on the Spiorad na Mara Offshore Wind Farm Development (N4) published by www.emg-lewis.co.uk in April 2026 found that 88% of residents from Ness to Uig opposed the N4 development. Approving this project against such overwhelming local consensus would directly contravene the National Islands Plan's commitment to community empowerment.

The National Islands Plan, page 65, para. 5 'Our vision is for islanders to be empowered to shape their own priorities, build their futures, and protect what makes their communities unique.'

Significant Adverse Impacts on Marine Mammals and Protected Marine Habitats: The Outer Hebrides are described by the Scottish Government's own scientists as "probably the richest area of the UK for marine mammals with around 20 species of cetacean recorded in the region over the last 30 years" (Scottish Marine and Freshwater Science Vol. 5 No. 9). The site lies adjacent to the Inner Hebrides and Minches SAC - the largest harbour porpoise SAC in Europe - within the wider range of the North-east Lewis MPA for Risso's dolphin, within documented fin and sperm whale migration corridors (Blue Corridors initiative), and within the wider feeding and habitat range of minke, humpback and sei whales, and within the foraging range of the Monach Isles grey seal colony (the largest in Europe). The EIAR fails to reflect this internationally significant baseline in its significance conclusions and cannot demonstrate, to the legal standard required, that adverse effects on these protected sites and species will be avoided. Under the Habitats Regulations Appraisal process, consent must be refused unless Scottish Ministers are satisfied beyond reasonable scientific doubt that the integrity of European sites will not be adversely affected (NatureScot HRA guidance). That standard has not been met.

Construction noise: The developer's own noise modelling (EIAR Appendix 19.2) provides for up to 5.5 hours of percussive piling per day, up to 10,635 strikes per pile per day, hammer energies up to 5,000 kJ, and 1,563 pin piles across two consecutive construction years (April–October). The EIAR itself acknowledges that "harbour porpoises are widely regarded as the most sensitive marine mammal receptor to underwater noise" and that behavioural disturbance can occur up to 70 km from piling (Bailey et al., 2010, cited in Chapter 13). The proposed piling window coincides with peak cetacean seasonal density and with harbour seal pupping (June–July), triggering the prohibition on deliberate disturbance of European Protected Species during breeding and rearing periods under the Conservation of Habitats and Species Regulations 2017 and Section 9 of the Wildlife and Countryside Act 1981.

The developer's own underwater noise modelling (EIAR Appendix 13.3) confirms that, even with noise mitigation applied, percussive piling at the northernmost foundation location generates a PTS (permanent auditory injury) range of up to 1,500 m for low-frequency cetaceans and a TTS (temporary auditory injury) range of up to 49 km. These are the developer's own figures, after mitigation. Low-frequency cetaceans include minke, fin, sei and humpback whales - all species documented in these waters. A 49 km auditory injury zone, repeated across an April–October piling window for two consecutive years, cannot credibly be reconciled with a classification of effects as "not significant."

NMP Policy GEN 13: development should avoid significant adverse effects of man-made noise and vibration on species sensitive to such effects. The EIAR predicts disturbance to 9.186% of the Risso's dolphin management unit population and 27.7% of the coastal bottlenose dolphin population from piling noise, yet classifies these effects as "not significant." GEN 13 sets an avoidance standard, not a tolerance threshold. The developer's own EPS and Basking Shark Risk Assessment (submitted to Marine Scotland, 22 February 2023) formally acknowledges risk of disturbance to minke whale, harbour porpoise, common dolphin, bottlenose dolphin, grey seal and basking shark from survey work alone. Full construction at this scale cannot credibly be claimed to present a lesser risk.

The 2023 Tolsta Stranding: In July 2023, 54 of 55 long-finned pilot whales died on Traigh Mhòr beach while geophysical surveys were being carried out at this lease area. The Scottish Government investigation could not rule out anthropogenic contribution and explicitly acknowledged limitations in the acoustic detection capability

of the recorders used. This recent and devastating event must weigh heavily in this decision.

Priority Marine Features and seabed disturbance: Kelp beds - confirmed present across 10 km² within the Study Area and designated as a PMF and blue carbon habitat - are assessed as sustaining "minor adverse" impact, with no compensatory measures proposed. Maerl beds, horse mussel beds, fan mussel aggregations and cold-water coral reefs (all Scottish PMFs) are either excluded on the basis of decade-old desktop data (Tyler-Walters et al., 2016) or not mentioned at all. The developer concedes that its primary mitigation - micro-siting of turbines and cables - "cannot be quantified until detailed design and further site-specific investigations are complete."

NMP GEN 5: safeguard natural carbon sinks including kelp beds. NMP GEN 9: do not result in significant impact on the national status of Priority Marine Features, and protect and enhance the health of the marine area.

Cumulative and in-combination effects: The Habitats Regulations require assessment of cumulative effects with other plans and projects. The Scottish Government's own 2026 ICIA Screening Report concedes that Scottish offshore wind plans are "likely...to undergo the derogations process under the Habitats Regulations." Spiorad na Mara is one of several large developments proposed in or adjacent to these waters; the cumulative assessment does not rigorously meet this requirement. NMP GEN 21 requires cumulative impacts affecting the ecosystem to be addressed.

Inadequate assessment and deferred mitigation: The joint representation from the Hebridean Whale and Dolphin Trust and Whale and Dolphin Conservation states that baseline cetacean data is "severely lacking." Proposed mitigation (MMOs, PAM, soft-start) is designed to address acute physical injury, not behavioural displacement; JNCC guidance confirms PAM has "limited range" for harbour porpoise and is "not suitable" for seals and baleen whales. Key mitigation is deferred to a post-consent Marine Mammal Mitigation Protocol, preventing Scottish Ministers from assessing adequacy at the point of determination - contrary to the beyond-reasonable-scientific-doubt standard required under the Habitats Regulations. Peer-reviewed monitoring at Scottish offshore wind farm construction sites (Benhemma-Le Gall et al. 2021, *Frontiers in Marine Science*) observed harbour porpoise displacement up to 12 km from pile-driving and 4 km from construction vessels alone - distances that no MMO, PAM or soft-start zone can address.

The EPS licence contradiction: The EIAR identifies that activities may require an EPS licence due to disturbance at a level requiring legal derogation, while simultaneously concluding residual effects are "negligible or minor." Under the Conservation of Habitats and Species Regulations 2017, an EPS licence can only be granted where no satisfactory alternative exists, imperative reasons of overriding public interest apply, and favourable conservation status is maintained. The EIAR demonstrates none of these.

Basking sharks (IUCN Endangered) were recorded by the developer's own July 2023 aerial survey (EIAR Appendix 13.1). The EIAR does not adequately assess EMF impacts from subsea cables on elasmobranchs, despite Scottish Government ScotMER research identifying this as an unresolved evidence gap (FF.07).

No alternative solutions: Under the Habitats Regulations, consent cannot be granted if alternative solutions exist. Other ScotWind sites are available in waters without the same density of European Protected Species and designated habitats, and the existence of those alternatives is directly relevant to whether consent for this site can lawfully proceed.

Consent would therefore breach or inadequately address the Conservation (Natural Habitats &c.) Regulations 1994, the Conservation of Habitats and Species Regulations 2017, the Marine (Scotland) Act 2010, Section 9 of the Wildlife and Countryside Act 1981, NMP Policies GEN 5, GEN 9, GEN 13 and GEN 21, and ASCOBANS Resolution 7.6 (2016) on underwater noise.

My further objection points:

My cousin just recently moved back to her husband's home on this island where you are building the wind farm. They've been so happy there and their son is now thriving. They are heartbroken to hear that the coastline will be practically destroyed by all of these gargantuan windmills.

This planning decision is about the long-term future and the character of a landscape and community that cannot be replaced once altered at this scale. Spiorad na Mara Offshore Wind Farm would cause significant, cumulative and largely irreversible harm to landscape and seascape character, heritage setting, and the tourism economy.

I respectfully request that this application is rejected.

Yours sincerely,

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [MD Marine Licensing](#); [MD Marine Renewables](#)
Subject: Objection to SPIORAD NA MARA offshore wind farm, Isle of Lewis
Date: 04 May 2026 21:35:36

[REDACTED]

Email: [REDACTED]

Date: 4th May 2026

To:

Marine Directorate – Licensing Operations Team
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB
United Kingdom

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, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and its supporting documentation, highlighting deficiencies that are material to planning, environmental, cultural, and procedural considerations. The development is situated off the west side of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, proximity, and scale of the proposal raise significant concerns about its compatibility with statutory requirements, national policy, and sustainable development principles.

There is a lack of an adequate evidential basis for a lawful determination of the application. Important environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal remain undefined. The employment of a flexible design framework obstructs a clear understanding of the potential significant effects. Furthermore, the reliance on unspecified mitigation measures complicates the ability to assess their effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the

environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust supporting evidence.

Substantive policy conflicts are evident. The proposal seems 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 fails to illustrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent and impede the competent authority's ability to conclude that the development is acceptable from a policy perspective.

In terms of scale, the proposal is unprecedented for this location, with large turbines positioned near the shoreline, which raises serious concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance demonstrate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the environmental effects of the proposed development. A major concern is the employment of a flexible Project Design Envelope, which lacks fixed turbine dimensions, layouts, or configurations. This uncertainty hinders the ability to consistently apply a worst-case scenario, thus undermining the integrity of the assessment. Consequently, the impacts reported may not accurately reflect those of the actual development, limiting both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Additionally, the application depends extensively on unspecified mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these circumstances implies that any environmental harm will be addressed subsequently, obstructing a thorough evaluation of their effectiveness or the assessment of any residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable, as it contradicts the Environmental Impact Assessment regime's requirement for significant effects and mitigation to be clearly established prior to determination.

There are also noteworthy evidential gaps, including insufficient baseline data and methodological limitations, leading to an overreliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty about the magnitude and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of robust information compromises the understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that does not align with statutory requirements.

Due to these issues, the application does not satisfy the evidential standard mandated

by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot prove that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an ill-defined design envelope, the absence of clearly specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents a significant inadequacy in the assessment of alternatives, failing to satisfy the statutory requirements of the Environmental Impact Assessment regime. It offers a narrative account of project evolution rather than a structured, reasoned comparison of realistic alternatives based on their environmental effects. This method does not demonstrate that less harmful options have been adequately identified, assessed, and selected in favour of more damaging solutions.

A transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations is notably absent. Specifically, the application does not establish that the developer has seriously contemplated placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in determining impact, the lack of such analysis precludes any conclusion that the proposed siting is the least damaging option.

The deficiencies further extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and a comparative analysis suggests that mitigation by design has not been utilised, leading to a reliance on post-design mitigation measures.

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

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful

determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species exhibits significant deficiencies that undermine the reliability of its findings concerning ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system, yet the data provided is incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat use of key species, resulting in an absence of a sound evidential basis for evaluating potential impacts.

One critical shortfall in the assessment is the failure to adequately acknowledge and evaluate the active use of coastal areas by otters, a species protected under European law, for both foraging and movement. This oversight neglects to consider their core foraging range and behavioural patterns, thus failing to assess the potential effects of construction-related disturbance, noise, and increased activity. This oversight compromises the validity of any conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks reveals further methodological shortcomings. The reliance on aerial surveys is problematic, as it introduces considerable detection bias, particularly under the conditions typical of the Atlantic. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent utilisation of these waters. The neglect to incorporate or properly evaluate such data leads to an incomplete baseline and diminishes the credibility of the conclusions presented.

These methodological limitations result in assessments of negligible or non-significant effects that are founded on assumptions rather than robust evidence. The lack of sufficient baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. Consequently, there is considerable uncertainty surrounding the actual risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to satisfy the requirements outlined within the Environmental Impact Assessment regime and the National Planning Framework 4, as it does not adequately identify or assess protected species. The level of uncertainty created prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, the lawful grant of consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant flaws in the ornithological assessment, marked by notable evidence gaps and internal inconsistencies that compromise its conclusions. Located within key foraging areas and migratory pathways, the development on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline, fails to convincingly demonstrate that these species will not face adverse effects. The assessment inadequately evaluates the risks of displacement, collision, and habitat loss, which are critical factors for these vulnerable populations.

A glaring contradiction exists within the application; while the developer asserts that there are no significant adverse effects, it concurrently puts forth a Habitats Regulations derogation case, which should only arise when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, suggesting that the conclusions drawn lack sufficient backing from the available evidence. Furthermore, the assessment does not adequately substantiate that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected, failing to consider the significance of these feeding grounds fully.

The methodologies employed are likely to underestimate potential mortality rates, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. This introduces uncertainty given that the baseline data is often incomplete and the behavioural responses of these birds are not fully understood. Additionally, the siting of turbines within a recognised migratory corridor poses a considerable risk, effectively creating an obstruction in a primary flight path for species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential impact on species with small global populations.

Regulatory requirements have not been met, as the application fails to provide the necessary evidence to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations means that the evidential standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, which hampers any lawful conclusion that might support consent.

Moreover, the identified deficiencies represent 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 important seabird populations will not be adversely impacted directly conflicts with national policy. Altogether, the assessment's unreliability, stemming from methodological weaknesses and insufficient evidence, undermines any robust evaluation of potential impacts, leading to the conclusion that the application does not satisfy the statutory requirements essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to cultural heritage and community identity is deeply flawed, particularly in its treatment of the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are intertwined. This

application diminishes heritage to a collection of disconnected, static assets, neglecting their active social, cultural, and spiritual roles within the community.

A significant oversight is evident in the evaluation of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as living places of burial and spiritual engagement, yet they are misrepresented as static features. This failure to acknowledge their ongoing use and significance not only leads to an incomplete understanding of cultural impacts but also overlooks their integral role in community life.

Additionally, the assessment neglects intangible cultural heritage, including the Gaelic language and traditions, alongside the long-established connection between the community and their coastal environment. These aspects are essential to the identity of the region, yet they are entirely omitted from the analysis, leaving a considerable gap in understanding the cultural ramifications of the development.

There are further issues regarding community rights and the lack of engagement with the Gaelic-speaking population, who possess a distinct cultural identity akin to Indigenous Peoples. The absence of a Free, Prior and Informed Consent process calls into question the validity of the assessment and contravenes recognised participatory principles in decisions that affect cultural and environmental interests.

Moreover, there is a critical procedural shortcoming due to the failure to conduct a compliant Island Communities Impact Assessment, as mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal obligations to assess the social, cultural, and economic effects on the island community, rendering any determination unlawful.

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

Ultimately, the combined neglect of living heritage, intangible cultural significance, community rights, and statutory obligations creates a substantial evidential void. The cultural effects of the proposed development have not been adequately evaluated, leaving the application insufficient for a thorough assessment of the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the complete Social Impact Assessment is a serious concern that compromises the integrity of the application. The developer conducted focus groups with local residents as part of the assessment, yet the full report has not been made available. This lack of transparency creates a significant evidential gap that hinders both public understanding and the competent authority's ability to evaluate the social risks that have been identified.

Available summaries indicate that local residents are already experiencing measurable

stress, anxiety, and concern due to the proposal's scale and proximity. These documented impacts arise from direct engagement and therefore should not be viewed as speculative. However, without access to the full assessment, proper scrutiny of these findings is not possible, limiting the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal poses a threat to community identity and cohesion, with the developer's own findings indicating a risk of "cultural loss." Despite this, these identified impacts have not been adequately incorporated into the main application or given the necessary weight in the assessment. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is crucial for developments of this magnitude, particularly when community character and functioning are at stake. The absence of the complete dataset means that the application fails to provide a comprehensive evidential basis for balancing benefits against potential harm.

From a policy standpoint, the application does not appear to comply with National Planning Framework 4 concerning health and wellbeing. Developments must contribute to positive health outcomes and avoid negative impacts, yet the evidence suggests that adverse effects are already present and have not been fully disclosed. Without the complete assessment, the demonstration of compliance with this policy is unsubstantiated.

The procedural implications of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission represents a material flaw within the application and fails to meet the evidential requirements outlined in the Environmental Impact Assessment framework.

In summary, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This deficiency prevents a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding seascape, landscape, and visual impacts is significantly inadequate and fails to convey the true extent of change anticipated or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines in close proximity to the shore would establish a persistent and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

The application does not sufficiently represent the extent of this visual transformation.

The size and nearness of the turbines will dominate views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the defining characteristics of naturalness and remoteness. The assessment inadequately communicates the significance of this impact within the context of such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. This suggests a possibility that the scale of the visual impact has been downplayed, which undermines the assessment's reliability.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are situated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete appraisal of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The magnitude of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case analysis further weakens any assertion of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their visibility would be overwhelming and unavoidable. Consequently, the change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the extent of impact, the environment's sensitivity, and the interconnectedness of landscape and heritage. These shortcomings preclude a dependable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant concerns regarding the completeness of its assessment related to construction and pollution risks, which lacks the necessary detail to evaluate potential environmental effects. Given the substantial seabed preparation and installation works proposed in a high-energy Atlantic environment, there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application indicates that mitigation and contingency measures will be formulated after consent, which obstructs any meaningful

assessment of their potential adequacy or effectiveness.

This reliance on unspecified future measures raises alarm, particularly when considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application does acknowledge risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring strategies.

Moreover, uncertainty persists regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly defined management strategies hampers the ability to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

The shortcomings in the application are further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application inhibits the evaluation of whether sufficient safeguards are in place to manage pollution events. This introduces procedural risks and undermines the capability of the competent authority to assess environmental protection measures adequately at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the obligations set out in the Environmental Impact Assessment regime. Significant likely effects and necessary mitigation must be evaluated prior to consent, and the absence of such information means that a lawful determination cannot be achieved. Furthermore, the application does not sufficiently demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, detailed management plans, and uncertainty regarding potential impacts create a materially deficient assessment. These deficiencies hinder a comprehensive evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposed application for development fails to provide a comprehensive assessment of fisheries and marine life, which is critical for understanding ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a thriving fishing industry; however, the submission does not adequately demonstrate how these vital uses and habitats can be preserved or sustained without significant disruption.

A fundamental concern arises from the assumption that fishing activities can be relocated without negative consequences. The application does not furnish any evidence that alternative fishing grounds exist, are accessible, or can accommodate increased pressure. This gap in information is critical, as such displacement could lead to overfishing in other areas, with potentially serious economic repercussions for the local fishing fleet. The absence of a thorough, evidence-based analysis means that the

repercussions for fisheries and livelihoods remain unclear.

Additionally, there are substantial risks posed to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over a prolonged period is likely to disturb species over considerable distances, with particular concern for dolphins. The predicted disruption to a significant segment of the local bottlenose dolphin population raises alarming issues, yet the application tends to minimise the importance of these effects, lacking adequate supporting evidence.

The application exhibits a notable inconsistency; it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction undermines the reliability of the assessment and raises serious compliance issues with the Habitats Regulations, especially when harm is foreseen to a degree that necessitates legal authorisation.

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

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 development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal represents sustainable development.

In conclusion, the deficiencies in evidence concerning fishing displacement, the minimisation of acoustic impacts, and the presence of internal inconsistencies lead to an incomplete and unreliable assessment. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is fundamentally deficient, failing to recognise the comprehensive impacts resulting from what constitutes a single integrated project. The offshore turbines and the onshore works are closely interconnected; however, their assessment is conducted in isolation. This fragmented approach obscures the overall environmental and socio-economic ramifications.

Included within the onshore works are the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the establishment of necessary access infrastructure through sensitive landscapes. These activities require excavation across areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thus inhibiting a complete understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application fails to

facilitate an accurate assessment of cumulative effects. The Environmental Impact Assessment process stipulates that all elements of a project should be considered collectively. The division of offshore and onshore components results in an incomplete understanding of the combined effects on peatlands, habitats, and communities.

Additionally, the proposal poses considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated, nor does it indicate that effective avoidance measures have been implemented. This results in a notable evidential gap concerning biodiversity protection.

Concerns are also raised about the project's carbon balance. Disturbances to peatland can lead to the release of stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this matter and fails to confirm that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure across active croft land introduces potential conflicts with existing land use and legal rights. The application does not present evidence that the necessary consents or procedures have been initiated, which raises doubts about the project's deliverability and legal compliance.

From a policy standpoint, the inability to assess the project as a cohesive whole and to demonstrate adequate protection for peatlands, habitats, and land use interests stands in opposition to the National Marine Plan and National Planning Framework 4. The failure to establish that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to address the assessment of nocturnal wildlife and dark skies, resulting in a substantial omission from the Environmental Impact Assessment. This deficiency is particularly concerning as the West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, which would be visible over long distances, creates a disruptive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. The importance of dark skies to the area's identity, particularly with the growing interest in astro-tourism, makes this oversight even more significant. The lack of consideration for these impacts reveals a clear gap in the landscape and environmental assessment.

Additionally, there has been no examination of how the proposed lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased collision risks. The absence of a lighting impact assessment or a phototaxis study means that the potential effects on these species and their mortality rates have not been adequately assessed.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal behaviours and associated risks. Other species like Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet their vulnerability has not been examined. The lack of site-specific night-time data creates a critical shortfall in understanding the ecological impacts involved.

Without a proper assessment of nocturnal impacts, it remains impossible to ascertain whether any protected species or designated sites would face adverse effects. The evidential standard required to rule out negative consequences beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions conflict with National Planning Framework 4, particularly regarding the protection of natural places and environmental quality. This oversight also compromises the overall evaluation of landscape and seascape impacts, as the character of night-time environments is an essential component of the broader ecological setting.

In summary, the absence of any assessment concerning dark skies and nocturnal wildlife constitutes a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and does not support a lawful determination.

TOURISM

The proposal presents a serious deficiency in assessing tourism impacts, neglecting to evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The success of tourism is inherently linked to the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application recognises that 86% of visitors are motivated by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the island has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite this growth, the application does not explore how the industrialisation of the seascape and the deterioration of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such analysis, it remains unclear whether the development would yield a net economic benefit or jeopardise a well-established and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in enhancing tourism, particularly regarding unspoiled landscapes and dark skies, which are essential for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, resulting in a significant gap in understanding impacts on an acknowledged and growing component of the local economy.

Given the context of an island community with limited economic diversification, the failure to assess tourism impacts holds broader implications for employment, local enterprises, and community sustainability. The omission 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 does not demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to show net benefit. It also contradicts strategic objectives that classify tourism as a priority growth sector and lacks adequate evidence to enable the competent authority to evaluate the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and acknowledging the island's economic dependency create a considerable evidential gap. This absence hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. Notably, this new application is presented within a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

A thorough evidential basis for the determination of the application is lacking, with significant gaps in baseline data. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of critical impact pathways—such as those affecting nocturnal wildlife, onshore infrastructure, and tourism—further contribute to an incomplete Environmental Impact Assessment. Consequently, this incompleteness hinders a full understanding of likely significant effects and residual impacts.

Moreover, procedural failures are apparent in this application. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018, and the failure to disclose a complete Social Impact Assessment is a material omission. These shortcomings impede the competent authority's ability to assess the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal conflicts with National Planning Framework 4 as it does not

demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable, and it cannot provide 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 properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent within themselves. The necessary evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, precluding a lawful conclusion that the impacts are acceptable.

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

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

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

Additional Comments

After careful consideration of the details of the project application within EIA, I am of the clear position that the members of my household will be severely affected by the noise and light pollution caused by the construction and running of the wind farm and the visual impact of the forest of turbines that is being proposed. I and my family, like many who live here, are highly sensitive to our environment and we would find the impacts from the wind farm quite unbearable.

Yours faithfully,

[Redacted Signature]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to Spiorad na Mara
Date: 04 May 2026 21:22:06
Attachments: [ATT00001.txt](#)
[ATT00002.txt](#)

Attached is my formal objection to Spiorad na Mara Offshore Wind Farm.

Many thanks
[REDACTED]

Unassessed Onshore Impacts and Breach of Statutory Rights of Crofters: Granting offshore consent while onshore impacts on irreplaceable machair and deep peatland remain unassessed, directly contravenes **NPF4 Policy 3**, which requires biodiversity (including irreplaceable habitats) to be left in a demonstrably better state. In addition the proposal fails to engage the statutory rights of crofters under the **Crofters (Scotland) Act 1993**.

NMP Para. 4.77 'There should be a presumption in favour of publishing applications for marine and terrestrial components of a development together during consenting processes.'

Irreversible Harm to the Tourism Economy and Coastal Character: The Spiorad na Mara wind farm would permanently industrialise the unspoiled coastal scenery and dark skies on the Isle of Lewis, destroying the very qualities that attract visitors to the island. Local residents have consistently warned during consultation that this visual impact would decimate the tourist industry on which so many islanders depend. Tourism is built on the area's landscape, seascape, heritage, nature, and dark skies. This development risks long-term damage to local businesses and the wider economy, contrary to **NPF4 Policy 30**.

NMP, Para. 12.28 'An unspoiled environment, high quality landscape and a sense of closeness to nature are important to many people. Scenery and environmental quality are key factors in attracting visitors to Scotland's coasts.'

Community Opposition and Lack of Community Empowerment: The Community Opinion Survey on the Spiorad na Mara Offshore Wind Farm Development (N4) published by www.ems-lewis.co.uk in April 2026 found that 88% of residents from Ness to Uig opposed the N4 development. Approving this project against such overwhelming local consensus would directly contravene the National Islands Plan's commitment to community empowerment. The National Islands Plan, page 65, para. 5 'Our vision is for islanders to be empowered to shape their own priorities, build their futures, and protect what makes their communities unique.'

My further objection points: I object to the proposed Spiorad na Mara Offshore Windfarm.

- It's going to have a huge negative impact for the island.
- Disappointed we not been given any information before now and realised they say 88% in favour. Anyone I know strongly objects to it!
- Disappointing that our council / gov has sold off the seabed to foreign companies and the Isle of Lewis residents who are affected don't benefit from the proposed wind farm in the long term
- The council has not looked after the island's best interest!
- Tourists who come for the views and wildlife, this is going to have a huge negative impact
- Visually, it is going to be awful!

This planning decision is about the long-term future and the character of a landscape and community that cannot be replaced once altered at this scale. Spiorad na Mara Offshore Wind Farm would cause significant, cumulative and largely irreversible harm to landscape and seascape character, heritage setting, and the tourism economy. I respectfully request that this application is rejected.

Yours sincerely,
[REDACTED]

Signature: [REDACTED]
Print name: [REDACTED]

To edit this document in Word, scan this QR code



Please Email to MD.MarineBiodiversity@scotland.nhs.uk By 7th May 2026
Or Post to: Marine Directorate, Licensing Operations Team, Scottish Gov, 375 Victoria Road, Aberdeen, AB11 9DB.

My address: [REDACTED]

Date: 4.5.26

Email: [REDACTED]

Postcode: [REDACTED]

MD-00011742 & MD-00011743 - Sgorrad na Mara Limited - Sgorrad na Mara Offshore Wind Farm - Isle of Lewis

I formally object to the above application as it contravenes the following planning policies and guidance:

Lack of Community Engagement: There was no consultation with the communities of west Lewis before Crown Estate Scotland identified and leased the M4 area for development. The plan was imposed on them without consent. Scotland's National Marine Plan (NMP) GEN 18 'Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.'

NMP Para. 4.77 'Engagement with the public and other stakeholders should be appropriate, proportionate and meaningful. It should be undertaken as early as possible in planning and consenting processes.'

NPF4 Spatial Principles - Just Transition. 'We will empower people to shape their places.'

Lack of understanding of Cultural Significance: The EIAR makes no reference to the personal, cultural or historical attachment of the population of Lewis to their landscape and heritage, and fails to assess impacts on the living intangible heritage of the Gaelic community. Until a full assessment addressing impacts on Gaelic language and culture, community wellbeing, and west Lewis communities' relationship with their coastline is completed and publicly consulted upon, this application cannot lawfully be determined.

NMP Para. 4.20 'The historic environment includes all aspects of the environment resulting from the interaction between people and places through time.'

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Significant Adverse Impacts on Protected Wildlife and Habitats: The development occupies primary foraging grounds for the Lewis Peatlands SPA red-throated divers, falls within the foraging range of the St Kilda gannet colony, and crosses a principal UK migratory corridor for protected species, including whooper swan and pink-footed goose. The EIAR fails to adequately assess the threats of collision, displacement, and barrier effects to these declining populations. Thus, consent would breach the **Conservation (Natural Habitats &c.) Regulations 1994**, the **2018 Offshore Regulations**, the **Marine (Scotland) Act 2010**, and the **Wildlife and Countryside Act 1981**, as the proposal is likely to adversely affect the integrity of the following SPAs: Lewis Peatlands, West Coast of the Outer Hebrides, Seas off St Kilda and St Kilda.

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Failure to Protect the Integrity and Setting of Scheduled Monuments: The EIAR anticipates significant adverse effects on coastal heritage. It fails to assess the impact on key scheduled monuments such as SM13786. The proposal would harm the Calanais monuments and wider historic landscape by introducing an industrial horizon into their natural surroundings, fundamentally undermining the meaning, experience, and interconnected setting of these sites, directly conflicting with **NPF4 Policy 7**. There are many alternative sites for offshore wind development and no reasons of over-riding public interest for choosing this site.

NMP Para. 4.22 'Marine planning should help to ensure that future marine activities and developments can be carried out in a way that respects the marine historic environment and the setting of important coastal heritage assets.'

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From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Formal objection
Date: 04 May 2026 20:18:44
Attachments: [ATT00001.txt](#)
[ATT00002.txt](#)

Please find attached my formal objection to Spiorad na Mara Offshore Wind Farm

Kind Regards

Unassessed Onshore Impacts and Breach of Statutory Rights of Crofters: Granting offshore consent while onshore impacts on irreplaceable machair and deep peatland remain unassessed, directly contravenes NPF4 Policy 3, which requires biodiversity (including irreplaceable habitats) to be left in a demonstrably better state. In addition the proposal fails to engage the statutory rights of crofters under the Crofters (Scotland) Act 1993.

NMP Para. 4.77 'There should be a presumption in favour of publishing applications for marine and terrestrial components of a development together during consenting processes.'

Irreparable Harm to the Tourism Economy and Coastal Character: The Spiorad na Mara wind farm would permanently industrialise the unspoiled coastal scenery and dark skies on the Isle of Lewis, destroying the very qualities that attract visitors to the island. Local residents have consistently warned during consultation that this visual impact would decimate the tourist industry on which so many islanders depend. Tourism is built on the area's landscape, seascape, heritage, nature, and dark skies. This development risks long-term damage to local businesses and the wider economy, contrary to NPF4 Policy 30.

NMP, Para. 12.28: 'An unspoiled environment, high quality landscape and a sense of closeness to nature are important to many people. Scenery and environmental quality are key factors in attracting visitors to Scotland's coasts.'

Community Opposition and Lack of Community Empowerment: The Community Opinion Survey on the Spiorad na Mara Offshore Wind Farm Development (N4) published by www.kmg.lewis.co.uk in April 2026 found that 88% of residents from Ness to Uig opposed the N4 development. Approving this project against such overwhelming local consensus would directly contravene the National Islands Plan's commitment to community empowerment.

The National Islands Plan, page 65, para. 5 'Our vision is for islanders to be empowered to shape their own priorities, build their futures, and protect what makes their communities unique.'

My further objection points:

1. LITTLE OR NO MEANINGFUL CONSULTATION
2. THIS PROJECT IS MAKING NO SECRET OF THE FACT, AND WILL EXHAUST EVERY TACTIC INCLUDING UNDERMINE, RESISTANCE IN SEVERE STRAIN ON LOCAL SERVICES AND NEUTRALISE FORMER IN COMING OF ALL SORTS.
3. NO FUNDING OR OTHER AIDING TO ISLANDERS
4. ALL OVERBOARD OUTSIDE B.M.
5. LEWIS IS RATED AS A TOP HOLIDAY DESTINATION AND WOULD STAND TO LOSE ITS TOURISM ADVANTAGE
6. THE VISUAL IMPACT WOULD BE HORRIBLE
7. MANY PEOPLE HAVE MOVED TO LEWIS TO ENJOY ITS UNIQUE ENVIRONMENT, PEACE AND TRANQUILITY. THIS PROJECT WOULD CREATE UNPAID EMPLOYMENT AND WOULD DESTRUCTIVELY ALTER THE ISLAND FOR ALL WHO LIVE IN IT.
8. ASIAN AND WEST-INDIAN EMPLOYEES OF THE IMPACT OF NEAR SEA OIL DEVELOPMENT IN SHETLAND AND THE DETERMINANTAL EFFECT OF RURAL COMMUNITIES, I STRONGLY OBJECT TO THIS APPLICATION AND WOULD NOT TO REJECT IT.

This planning decision is about the long-term future and the character of a landscape and community that cannot be replaced once altered at this scale. Spiorad na Mara Offshore Wind Farm would cause significant, cumulative and largely irreversible harm to landscape and seascape character, heritage setting, and the tourism economy. I respectfully request that this application is rejected.



To edit this document in Word, scan this QR code

Signature: [REDACTED]

Print name: [REDACTED]

Please Email to MD.Marine@scotland.nhs.uk By 7th May 2025.
Or Post to: Marine Directorate, Licensing Operations Team, Scottish Gov, 375 Victoria Road, Aberdeen, AB11 9DB.

My address:

Postcode:

Email:

Date:

26

MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis

I formally object to the above application as it contravenes the following planning policies and guidance:

Lack of Community Engagement: There was no consultation with the communities of west Lewis before Crown Estate Scotland identified and leased the NA area for development. The plan was imposed on them without consent. Scotland's National Marine Plan (NMP) GEN 1B 'Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.'

NMP Para. 4.77 'Engagement with the public and other stakeholders should be appropriate, proportionate and meaningful. It should be undertaken as early as possible in planning and consenting processes.'

NPf4 Spatial Principles - Just Transition. 'We will empower people to shape their places.'

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Offshore Regulations, the **Marine (Scotland) Act 2010**, and the **Wildlife and Countryside Act 1981**, as the proposal is likely to adversely affect the integrity of the following SPAs: Lewis Peatlands, West Coast of the Outer Hebrides, Seas off St Kilda and St Kilda.

NPf4 Policy 7.1 'Development proposals affecting a World Heritage Site or its setting will only be supported where their Outstanding Universal Value is protected and preserved'

NPf4 Policy 11 e 'Impact on biodiversity including impacts on birds' must be addressed.

Failure to Protect the Integrity and Setting of Scheduled Monuments: The EIA anticipates significant adverse effects on coastal heritage. It fails to assess the impact on key scheduled monuments such as SM13786. The proposal would harm the Calanais monuments and wider historic landscape by introducing an industrial horizon into their natural surroundings, fundamentally undermining the meaning, experience, and interconnected setting of these sites, directly conflicting with **NPf4 Policy 7**. There are many alternative sites for offshore wind development and no reasons of over-riding public interest for choosing this site.

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NPf4 Policy 7 h 'Development proposals affecting scheduled monuments will only be supported where:' 'i) 'significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or ii) exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.'

Member of Public 2340

From: [REDACTED]
To: [MD Marine Licensing](#)
Subject: SPIORAD NA MARA
Date: 04 May 2026 19:46:27

The impact of the SPIORAD NA MARA wind farm development will have a massive detrimental effect on marine life for decades to come, not forgetting the people living in the vicinity. This development is not necessary for Scottish power generation as we are almost producing enough power for our own consumption. Indeed 99% of power generated from this project will be sent elsewhere lining the pockets of others.

Totally unnecessary.

[REDACTED]

Sent via BT Email App

Member of Public 2341

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: MD-00011742&MD-00011743 Spiorad na Mar-Offshore Wind Farm-Isle of Lewis
Date: 04 May 2026 17:33:39

This planning decision is about the long term future and the character of a landscape and community that cannot be replaced once altered at this scale. Spiorad na Mara Offshore Wind Farm would cause significant, culminative and largely irreversible harm to landscape and seascape character, heritage setting, and the tourist economy .

I respectfully request that this application be rejected.



Sent from my iPhone

Member of Public 2342

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: MD 00011742 & MD 00011743 Spiorad na Mara Ltd
Date: 04 May 2026 18:38:24

Please call me on [REDACTED] if there is a problem with this objection.

[REDACTED]

Please Email to MD.MarineRenewables@gov.scot By 7th May 2026

Or Post to: Marine Directorate, Licensing Operations Team, Scottish Gov, 375 Victoria Road, Aberdeen, AB11 9DB.

My address: [REDACTED]

Postcode: [REDACTED]

MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis

I formally object to the above application as it contravenes the following planning policies and guidance:

Lack of Community Engagement: There was no consultation with the communities of west Lewis before Crown Estate Scotland identified and leased the N4 area for development. The plan was imposed on them without consent. **Scotland's National Marine Plan (NMP) GEN 18** *'Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.'*

NMP Para. 4.77 *'Engagement with the public and other stakeholders should be appropriate, proportionate and meaningful. It should be undertaken as early as possible in planning and consenting processes.'*

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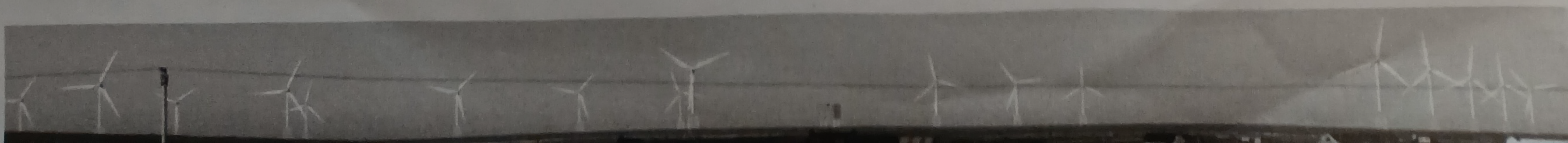
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NMP Para. 4.22 *'Marine planning should help to ensure that future marine activities and developments can be carried out in a way that respects the marine historic environment and the setting of important coastal heritage assets.'* **Para. 4.23** *'Designated assets should be protected in situ within an appropriate setting.'*

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My further objection points:

I do not understand why national (NPF4) and local planning policies, the wishes of the community are being ignored and our communities scale, character and culture being ignored by the Scottish Government in favour of huge developments being underwritten by SEN et al. National and local democracy is being cast aside.

This planning decision is about the long-term future and the character of a landscape and community that cannot be replaced once altered at this scale. Spiorad na Mara Offshore Wind Farm would cause significant, cumulative and largely irreversible harm to landscape and seascape character, heritage setting, and the tourism economy.

I respectfully request that this application is rejected.

Yours sincerely,

Signature:

[Redacted Signature]

Print name:

[Redacted Name]



To edit this document in Word, scan this QR code



I have put an X in this box because I want my personal details to be kept confidential.

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: SPIORAD NA MARA OFFSHORE WINDFARM OBJECTION
Date: 04 May 2026 16:21:10

To whom it may concern,

I am hereby submitting my objection for the farce that is the Spiorad Na Mara Offshore Windfarm that has been planned for the west coast of Lewis.

Firstly, it is because there was NO consultation with the people who actually live on the island, let alone in the near vicinity of where they are planned to be erected, before it was granted the go ahead.

We only found out once the grounds had actually been purchased by the companies proposing to erect these turbines, and that it had been approved by our local council, without proper consultation to locals.

Our dear local council, who absolutely have lied through their teeth claiming that "there is strong local support for marine energy developments around the islands", when since then, a recent survey has shown an 88% disapproval rate.

Absolutely zero consultation or distribution of information about the possibility of the windfarms had been put out, until it had already been passed and approved. What a load of shit, for want of a better way of putting it.

Corrupt, sneaky bastards, selling us down the river. How can they say they represent us, when they do not even bother to inform us of such plans.

If this venture had been transparent and not done with an underhanded nature, then I would not nearly have as much of an issue with it going ahead, but its the principal of the matter.

Also, I object for many other reasons.

The harm to marine mammals and birdlife.

The fact that they only have a 30-year lifespan. (I doubt the amount of energy they will output will cover the amount of energy/resources that has been put into their fabrication and installation) AND habitat disruption that will be affected on land and on sea for many years to come.

No locals who will be directly affected will even be considered for cheaper electricity tariffs.

Most of the jobs will be specialist, and will be therefore outsourced to mainland/overseas employees

So there you have it.



Member of Public 2344

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: I am sharing "Formal Objection Letter to Spiorad na Mara Offshore Wind Farm (N4)"
Date: 04 May 2026 15:11:05
Attachments: [Formal Objection Letter to Spiorad na Mara Offshore Wind Farm \(N4\).docx](#)

Attached is my formal objection to the Spiorad na Mara Offshore windfarm

My address: _____

Postcode: _____ Email: _____

Date: _____ 04th may 2026 _____

MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis

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The National Islands Plan, page 65, para. 5 *'Our vision is for islanders to be empowered to shape their own priorities, build their futures, and protect what makes their communities unique.'* **My further objection points:** it will not be supplying the Island with electricity

This planning decision is about the long-term future and the character of a landscape and community that cannot be replaced once altered at this scale. Spiorad na Mara Offshore Wind Farm would cause significant, cumulative and largely irreversible harm to landscape and seascape character, heritage setting, and the tourism economy. **I respectfully request that this application is rejected.**

Yours sincerely,

***Note** I confirm that the views expressed in this email are my own and I intend for this typed name to act as my signature

