

Member of the public 2265

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] Email: [REDACTED] Date: 07 May 2026

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,'*

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 I *'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.'*

My further objection points:

This proposal has been pushed through with no community engagement. The corporation behind this project will benefit immensely from our plentiful natural resources while offering no discernible benefit to the local community who will be most affected. Projects on this kind of massive scale must be done with care, consideration and meaningful negotiation with local communities. This was not done in this case. While I am in favour of renewable energy and see the great potential of our island, we must hold our resources to a higher value, and not allow financially-motivated companies to exploit them, and by extension, us.

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:(type your name here)** [REDACTED]

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Postcode: [REDACTED] Email: [REDACTED] Date: 04 May 2026

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Subject: Formal Objection to MD-00011742 & MD-00011743 - Spiorad na Mara Limited -
Spiorad na Mara Offshore Wind Farm - Isle of Lewis

Full Name: [REDACTED]

Full Address: [REDACTED] [REDACTED]

Postcode: [REDACTED]

Date: 7 May 2026

Dear Case Officer,

I am a resident of Sgìre Uig, and I am submitting this representation in advance of the 7 May 2026 statutory deadline to ensure my concerns are fully considered in the determination of this application.

I write to formally object to the proposed Spiorad na Mara Offshore Wind Farm* (MD-00011742 & MD-00011743), submitted by Spiorad na Mara Limited under Section 36 of the Electricity Act 1989 and associated marine licensing provisions. This representation is made following review of the Environmental Impact Assessment Report (EIAR) and supporting documentation submitted as part of the application.

**Term of Reference: Throughout this document, the project is referred to as "N4." This choice reflects a community-wide rejection of the name "Spiorad na Mara," which is viewed as an insensitive cultural appropriation of the Gaelic language by a developer with no cultural connection to Lewis.*

"This proposal represents a clear and unacceptable policy failure. It stands in direct conflict with **National Planning Framework 4 (specifically Policies 1, 3, 4, 5, 7, 11, 14, and 30)**, the **Outer Hebrides Local Development Plan**, the **Electricity Act 1989**, and the **Aarhus Convention**. The application seeks to impose industrial-scale infrastructure onto a nationally sensitive landscape and an internationally significant cultural setting, threatening permanent and irreversible harm. The magnitude of this impact is not capable of meaningful mitigation; once implemented, the damage to the character of the landscape and seascape, the integrity of the heritage setting, and the local economic foundations cannot be undone.

The application is in direct conflict with the following mandatory policies:

- **NPF4 Policy 1 (Global Climate & Nature Crises):** The proposal fails the primary test of NPF4 by failing to prioritise the nature crisis. The permanent destruction of the Barvas Moor - a critical carbon sink - cannot be justified by renewable energy targets that undermine the local ecological balance.
- **NPF4 Policy 3 (Biodiversity):** There is a critical failure to provide sufficient baseline data for protected species. Furthermore, the application lacks credible evidence for "measurable biodiversity enhancement," a mandatory requirement for development of this scale.
- **NPF4 Policy 4 (Natural Heritage):** The development breaches this policy by failing to protect the "wild character" of the seascape. Notably, the omission of a Dark Skies Assessment disregards the impact on the area's unique nocturnal environment and natural heritage.

- **NPF4 Policy 5 (Soils):** The project violates the presumption against development on deep peat. It fails to demonstrate that the massive disturbance to carbon-rich soils is either essential or balanced by long-term carbon gains.
- **NPF4 Policy 7 (Historic Assets and Places):** The application fails on three distinct fronts:
 - **7(a):** It neglects the **Gaelic cultural significance** and intangible heritage of the landscape.
 - **7(h):** It adversely impacts the setting of **Scheduled Monuments**.
 - **7(l):** It threatens the **Outstanding Universal Value** of the Lewis landscape and its internationally recognized archaeological sites.
- **NPF4 Policy 11 (Energy):** The application fails to address the cumulative impact of the onshore and offshore infrastructure on the environment and existing land uses, leading to "salami-slicing" of the environmental assessment.
- **NPF4 Policy 14 (Design, Quality and Place):** The project fails to prioritize the health and wellbeing of the local population, disregarding the documented community stress and the "place-based" impacts on the townships.
- **NPF4 Policy 30 (Tourism):** The application is insufficient as it fails to quantify or mitigate the risks to the £81.5 million local tourism economy, which is inextricably linked to the visual and environmental integrity of the West Lewis coast.
- **Outer Hebrides Local Development Plan (OHLDP) – Policy NBH1 (Landscape):** The proposal conflicts with the OHLDP's mandate to ensure that development relates to the specific landscape character of the islands. The scale and industrial nature of N4 are entirely incompatible with the "Local Landscape Character Area" of West Lewis, undermining the Plan's objective to protect the distinct visual and cultural identity of the Outer Hebrides.
- **Aarhus Convention:** The project fails the democratic test of the Convention by misrepresenting community opposition and failing to take public participation into due account.
- **Electricity Act 1989 (Schedule 9):** The proposal indicates a statutory breach, as the license holder has failed to demonstrate "regard for the desirability of preserving natural beauty" and the conservation of flora and fauna.

In Plain English The N4 proposal is located off the West Side of the Isle of Lewis, a region defined by its wild, Atlantic-facing coastline and near-pristine natural environment. This development is simply too large and too close to the shore. Because the developer has left out many critical details, it is not possible for the public to truly understand the full extent of the damage this will do to nature, local culture, and daily life in these unique coastal townships. The proposal fundamentally breaches multiple statutory requirements designed to safeguard public health and the environment. Consequently, on the information currently available, the application has not provided adequate evidential basis to conclude that the project's likely significant effects, mitigation, and residual impacts have been robustly assessed.

Core Issues

- **Strategic Policy Non-Compliance:** The application is fundamentally inconsistent with the statutory requirements of the National Marine Plan and the core objectives of NPF4 regarding biodiversity, landscape character, cultural heritage, and public health.
- **Procedural Defect and Misrepresentation:** The developer's Consultation Report relies on demonstrably false claims of community support. The assertion that the local

population is “prepared for and supportive” of this deployment is factually incorrect and unsupported by evidence, constituting a breach of the Aarhus Convention’s mandate for authentic public engagement.

- **Fragmented Environmental Assessment (“Salami-Slicing”):** By deferring the assessment of major onshore impacts - such as the massive substation footprint and haul roads - the applicant has bypassed the legal requirement for a Cumulative Impact Assessment. This strategy masks the true, total damage to carbon-rich peatlands and vital crofting land.
- **Fundamental Data Deficiencies:** The proposal is based on weak baseline data and significant inconsistencies in reported environmental effects. Furthermore, the reliance on "mitigation measures" that remain undefined makes it not possible for the Directorate to verify if the environmental harm can actually be managed.
- **Unprecedented and Unacceptable Scale:** The project’s immense size and aggressive proximity to the Isle of Lewis shoreline are unprecedented, threatening irreversible damage to the seascape and the Atlantic Machair. Industrialising this internationally significant habitat will destroy the traditional crofting practices that are essential to its ecological survival.
- **Incomplete Information for Determination:** Due to the gaps in environmental, cultural, and community impact data, the application is currently unfit for a full or informed determination.

Technical Summary for Planning Officers

- **National Policy Conflicts:** Direct conflict with National Planning Framework 4 (NPF4) regarding the Climate and Nature Crises, Biodiversity, Natural Places, Historic Assets, Energy, and Health and Wellbeing.
- **EIA Adequacy:** The Environmental Impact Assessment Report (EIAR) is deficient due to gaps in baseline data and a failure to demonstrate that a realistic worst-case scenario has been consistently applied.
- **Procedural Uncertainty:** The heavy reliance on post-consent mitigation and monitoring plans prevents the competent authority from making a robust and lawful determination at this stage.

1. Environmental Impact Assessment Adequacy

In Plain English There are deep concerns that the developer’s paperwork does not provide a full or transparent picture of the damage this project could cause to the West Lewis coast. Instead of providing clear facts, the developer has used a "flexible" design that makes it not possible to determine the true impact on the coast. Furthermore, permission is being sought now while promising to figure out how to address environmental damage later. It is argued that a project cannot be safely or legally approved when the solutions to the problems it creates have not yet been written.

Core Issues

- **The "Blank Check" Design:** By using a "Project Design Envelope", the developer hasn't committed to specific turbine sizes or layouts. This makes it not possible to know if the "worst-case scenario" for the environment has actually been studied.
- **Missing Solutions:** The application relies heavily on plans to fix or monitor damage that will only be created after the project is approved. Their effectiveness cannot be judged because they do not exist yet.

- **Uncertain Impacts:** Because the final design remains a moving target, the public and decision-makers cannot be sure that the listed impacts represent the true extent of the potential consequences.
- **Lack of Evidence:** The developer has not proven that national requirements to protect nature and climate can be met, having failed to provide a complete and reliable assessment.

Technical Summary for Planning Officers

- **Design Envelope Uncertainty:** The EIAR fails to consistently apply the "Rochdale Envelope" principle. The lack of defined worst-case scenarios and refusal to commit to specific turbine dimensions undermines the reliability of the entire assessment.
- **Pre-determination of Mitigation:** There is an impermissible reliance on post-consent mitigation and monitoring. Because these are not defined within the application, their effectiveness cannot be tested, preventing a robust assessment of residual effects at the decision stage.
- **Evidential Deficiency & Legal Thresholds:** The application fails the "beyond reasonable scientific doubt" standard required under the Habitats Regulations. For example, regarding protected Kittiwakes, the developer admits a lack of site-specific data for night-time or storm conditions, relying instead on optimistic assumptions.
- **Policy Non-Compliance:** The project fails the "satisfactory manner" threshold of NPF4 Policy 11 and the biodiversity mandates of NPF4 Policy 3. This absence of evidence necessitates refusal based on the Precautionary Principle.

2. Assessment of Alternatives

In Plain English By law, a developer must show they have explored different ways and locations to build a project to ensure the least damaging option is chosen. In this case, the developer has provided a history of their own design choices rather than proving why other, less harmful options were rejected. There is no evidence of a serious attempt to move the turbines further out to sea or to find a cable path that avoids sensitive areas like Barvas Cemetery. For a site located off such a culturally sensitive coastline, the failure to honestly compare alternatives means it cannot be proven that this is the least harmful way to proceed.

Core Issues

- **Lack of Real Comparison:** The developer provided a narrative of project history instead of a structured, side-by-side comparison of different locations based on environmental damage.
- **Refusal to Move Further Offshore:** There is no transparent evidence that the developer seriously considered sites further from the coast, which would significantly reduce visual and environmental impacts.
- **Threats to Sacred Sites:** The assessment of cable routes and landfall points is inadequate. It fails to show that the developer tried to avoid sensitive areas, such as Barvas Cemetery, which holds deep cultural and spiritual importance.
- **Failure to Minimise Harm:** The developer has not proven that this specific plan is the "least damaging" option, a key requirement for a project of this scale.

Technical Summary for Planning Officers

- **Inadequate Alternatives Assessment:** The EIAR fails to meet the statutory requirement for a reasoned and structured comparison of reasonable alternatives based on environmental effects.
- **Siting and Routing Deficiencies:** Landfall and cable routing assessment lacks evidence of a "mitigation by design" approach. Alternatives were not adequately evaluated to minimise impacts on high-value sensitive receptors.

3. Marine Ecology and Protected Species

In Plain English The Westside coastline is a living environment home to rare and protected animals, yet the study of these creatures is incomplete. The assessment overlooks how local otters use the shores for foraging and relied on aerial surveys to count basking sharks, ignoring years of sightings reported by local observers from the cliffs. By using flawed methods and disregarding local expertise, the true risk to wildlife in these Atlantic waters is being downplayed. Biodiversity cannot be protected if the animals living there have not been properly accounted for.

Core Issues

- **Overlooking Otters:** The study fails to recognise that otters actively hunt and live along the coast. Consequently, the developer hasn't assessed how construction and noise will affect these protected animals.
- **Flawed Shark Surveys:** Reliance on aerial surveys for basking sharks is notoriously unreliable in these waters. Established land-based sighting data proving these sharks are frequent visitors has been ignored.
- **Recently published Tolsta Bay pilot whale study:** provides direct evidence that shelf-slope habitats are important feeding grounds for long-finned pilot whales, a deep-water species whose movements and foraging are still poorly understood. Because these habitats lie within the wider offshore environment affected by the proposal, the assessment should address potential effects on deep-water marine mammals more explicitly
- **Unreliable Conclusions:** Because the baseline data is insufficient, claims that there will be no impact are based on assumptions rather than facts.
- **Policy Failure:** The project fails to meet national requirements to protect biodiversity because it has not properly identified the presence of these animals.

Technical Summary for Planning Officers

- **Habitat Use Misrepresentation:** The EIAR fails to adequately assess the "core foraging range" of coastal otters.
- **Methodological Deficiency:** Reliance on aerial surveys introduces significant "detection bias" and undermines the robustness of the baseline data for basking sharks.

4. Ornithology and Seabird Impacts

In Plain English The western coastline of Lewis supports world-famous seabird colonies that are currently struggling for survival. This project sits in the middle of vital feeding grounds and a major "highway" for migrating swans and geese travelling between the UK and Iceland. The developer claims no significant harm, yet they are basing this on optimistic guesswork. Most strikingly, the application contains a fundamental contradiction: it claims "no impact" while simultaneously preparing a legal case (a Derogation) to bypass protections because the damage is expected to be

significant. The local extinction of species like the Kittiwake cannot be risked on the basis of such conflicting evidence. (also see 11. Dark Skies and Nocturnal Wildlife)

Core Issues

- **Contradictory Legal Arguments:** The developer claims "no significant effect" while also filing a "Derogation Case" - a move only used when significant harm is expected. This renders the assessment unreliable.
- **Threat to Protected Areas:** Turbines are located in feeding waters used by birds from the Lewis Peatlands and St Kilda protected sites. No proof has been provided that these birds will remain unharmed.
- **Underestimating Mortality:** For species in "catastrophic decline", such as Kittiwakes and Fulmars, the mathematical models used systematically underestimate deaths from collisions and habitat loss.
- **Blocking Migration "Highways":** The project risks sustained mortality for species with small global populations by placing a wall of turbines in a primary migration corridor.

Technical Summary for Planning Officers

- **HRA Inconsistency:** Procedural conflict between "no significant adverse effect" conclusions and the submission of a Habitats Appraisal Derogation Case.
- **Precautionary Principle:** The "beyond reasonable scientific doubt" threshold for the Habitats Regulations has not been reached.

5. Cultural Heritage and Community Identity

In Plain English This stretch of coastline is the heart of a living Gaelic culture. The current assessment treats sacred sites - such as the ancient cemeteries at Dalmore, Bragar and Barvas - as if they were static buildings rather than places of active community use and burial. Furthermore, the fact that this is a Gaelic-speaking community with an ancestral bond to the sea has been largely ignored. The Gaelic-speaking population meets the recognised definition of an Indigenous People, yet no "Free, Prior and Informed Consent" has been sought. Failing to assess the "cultural cost" ignores the rights of the community and the laws meant to protect island life.

Core Issues

- **Ignoring Living Heritage:** Sites like Barvas, Bragar and Dalmore cemeteries are treated as "static assets" rather than active places of burial and spiritual practice.
- **Erasure of Gaelic Culture:** There is no assessment of "intangible heritage". The language and traditions tied to this seascape have been overlooked.
- **Failure to Seek Consent:** No Free, Prior and Informed Consent (FPIC) has been sought from the community.
- **Breach of Statutory Duty:** No compliant Island Communities Impact Assessment (ICIA) has been submitted, which is a legal requirement under the 2018 Act.

Technical Summary for Planning Officers

- **Statutory Deficiency:** Failure to submit an ICIA prevents a lawful determination.
- **Violation of Heritage Policy:** Direct conflict with NPF4 Policy 7 and HEPS ; the EIAR fails to assess intangible and living heritage.

6. Social Impacts, Health, and Wellbeing

In Plain English Significant concerns exist regarding the social impact and wellbeing of the Westside communities. The developer, Northland Power, commissioned a full Social Impact Assessment (SIA) which included focus groups with local residents, yet they have refused to publish the full report. This lack of transparency is a major gap. Preliminary findings from their own study already indicate that residents are experiencing significant stress, anxiety, and a sense of "cultural loss" regarding the industrialisation of their home. A project cannot be claimed to support "wellbeing" when the evidence of the harm it is causing - documented by the developer's own consultants - is being withheld from the public.

Core Issues

- **Hidden Evidence:** The full Social Impact Assessment commissioned by Northland Power has not been published, preventing the public and decision-makers from seeing the true scale of social risks identified by the developer's own research.
- **Documented Mental Health Toll:** Preliminary data from the developer's study shows that residents are already experiencing measurable stress and anxiety due to the unprecedented scale of the proposal and its proximity to their homes.
- **Threat to Community Identity:** The project is identified within internal summaries as a direct threat to Gaelic culture and community cohesion, yet these "human" costs have been sidelined in the main application.

Technical Summary for Planning Officers

- **Non-Disclosure of Social Impact Data:** There is a significant material omission in the application due to the failure to publish the full Social Impact Assessment (SIA) commissioned by the applicant.
- **Evidence of Adverse Impact:** Preliminary data contained within EIAR Appendix 6.2 (Focus Group Summary) explicitly identifies existing adverse impacts on community mental health and wellbeing.
- **NPF4 Policy 14:** The applicant has failed to provide the competent authority with the necessary evidence to demonstrate that the project supports positive health outcomes or avoids negative impacts. By withholding the full SIA results, the developer cannot prove compliance with the health and wellbeing mandates of NPF4.
- **Procedural Deficiency:** The lack of transparency regarding social data undermines the ability of the competent authority to perform a robust socio-economic and health evaluation as required under the EIA Regulations.

7. Seascape, Landscape, and Visual Impacts

In Plain English The West Lewis coast is defined by its vast, open, natural beauty and the direct connection between the land and the Atlantic. This project would replace that natural horizon with a massive industrial presence. Because the turbines are so tall and located so close to the shore, they would dominate the views from historic beaches and family homes, destroying the sense of remoteness that has existed for generations. There are also concerns that the visual aids provided do not accurately show the impact on the most important landmarks, sacred sites, and Scheduled Monuments, including the interconnected setting of the wider megalithic landscape associated with the Calanais Standing Stones. The developer has failed to account for how these historic places are

interconnected with each other and with the sea, treating them as isolated dots on a map rather than part of a living, ancient landscape.

Core Issues

- **Industrial Dominance:** The sheer size and proximity of the turbines will create an intrusive presence that overwhelms the natural coastline.
- **Loss of Character:** The project will permanently alter the "wild" and undeveloped character of the area.
- **Flawed Visual Evidence:** Concerns exist that viewpoints were selected to avoid showing the full impact on residents and high-value cultural heritage sites.
- **Unacceptable Change:** The scale of the visual change cannot be mitigated; it represents a permanent transformation of a sensitive seascape.

Technical Summary for Planning Officers

- **Policy Conflict:** Direct conflict with NPF4 Policy 4 (Natural Places) and Policy 7 (Historic Assets and Places).
- **Methodological Concerns:** Selection bias in viewpoint orientation - specifically regarding Scheduled Monuments - risks a significant underestimation of the magnitude of change. The assessment fails to utilise "worst-case" wireframes from the most sensitive elevations of these protected assets.
- **Interconnected Setting:** The SLVIA fails to address the relationship between coastal monuments, treating their settings as static and localised. It ignores the inter-visibility between multiple Scheduled Monuments and their shared historical connection to the open Atlantic horizon. By industrialising the seascape, the project severs the functional and spiritual link between these heritage assets and the sea.

8. Construction and Pollution Risks

In Plain English Seabed preparation and cable installation in these powerful Atlantic waters carry high risks of sediment disturbance and accidental chemical or oil spills. While the developer acknowledges these risks, they have not provided a completed plan to prevent them. Instead, they are asking for permission now and promising to write safety and emergency plans later. It is not possible to know if water quality and marine life will be safe until the specific safety measures are presented and reviewed.

Core Issues

- **Incomplete Safety Planning:** Reliance on "contingency plans" that do not yet exist means there is no proof that a major pollution event can be handled.
- **Seabed Disturbance:** The full impact of sediment clouds on clean coastal waters and sensitive habitats has not been clearly assessed.
- **Post-Consent Promises:** By leaving management details until after permission is granted, the developer avoids scrutiny of their actual protective measures.

Technical Summary for Planning Officers

- **Information Deficiency:** Failure to provide detailed CEMPs or Pollution Prevention Plans prevents a robust assessment.

- **Pre-determination Risk:** Over-reliance on post-consent conditions for core environmental safeguards.

9. Fisheries and Marine Life

In Plain English The waters off West Lewis are both a workplace for local fishermen and a home to some of the most diverse whale and dolphin populations in the UK. The developer assumes fishermen can simply move to other grounds but provides no evidence that those areas are available or can support the extra pressure. Furthermore, the plan to drive giant poles into the seabed with massive hammers will create noise loud enough to disturb dolphins up to 70km away. You cannot claim to protect the marine environment while causing such extreme disturbance to the creatures that live in it.

Core Issues

- **Livelihoods in Limbo:** No evidence is provided that alternative fishing grounds are available or that displacement won't lead to overfishing elsewhere.
- **Acoustic Assault:** High-energy hammer piling will occur for two years, overlapping with critical breeding and pupping seasons.
- **Underestimated Harm:** Nearly 28% of the local bottlenose dolphin population is predicted to be disturbed, yet the developer dismisses this as "not significant".
- **Legal Contradictions:** The developer admits the need for "harm" licenses (EPS) while claiming the effects are "negligible".

Technical Summary for Planning Officers

- **Fisheries Impact:** Failure to demonstrate compliance with NPF4 Policy 11 and National Marine Plan Policy GEN 4.
- **Habitats Regulations:** An Appropriate Assessment cannot conclude "no adverse effect" given the scale of predicted marine mammal disturbance.

10. Onshore Infrastructure: Hidden Impacts

In Plain English The offshore turbines and onshore infrastructure are a single project, yet they are being treated separately. This hidden part of the development involves digging up miles of protected moorland across Barvas Moor, building a massive substation outside Stornoway, and running roads through active crofts and rare coastal grass (machair). By leaving these details out of the current application, the developer is obscuring the true damage to peatlands - which are vital carbon stores - and the traditional crofting way of life.

Core Issues

- **Incomplete Application:** Onshore infrastructure has been excluded from this assessment, meaning the "whole project" impact remains unknown.
- **Threat to Rare Habitats:** Risks to the rare machair and peatlands have not been subject to a full Habitats Regulations Appraisal.
- **Carbon Hypocrisy:** Destroying peatland - a major carbon store - to build a "low-carbon" project is a fundamental contradiction.

- **Crofting Rights:** The route cuts through active croft land, but legal processes for using this land have not even been initiated.

Technical Summary for Planning Officers

- **Project Splitting:** Severance of offshore and onshore consents breaches National Marine Plan Policy GEN 1.
- **Deliverability:** Without Crofting Commission approval, the deliverability of the project is unproven.

11. Dark Skies and Nocturnal Wildlife

In Plain English The West Lewis coast is one of the darkest places in Europe, and its pristine night skies are a major part of the island's identity and tourism appeal. This project would place a permanent "wall of light" on the western horizon, with red aviation lights visible for nearly 40km every night for 35 years. Beyond ruining the view of the stars and Northern Lights, these lights pose a lethal risk to rare seabirds. Species such as the **Manx Shearwater**, **European Storm Petrel**, and **Leach's Storm Petrel** are strictly nocturnal when near land ; they are fatally attracted to artificial lights (a phenomenon known as phototaxis). Also, while primarily active by day, Kittiwakes often forage and migrate at night, but lacking night vision, they are highly vulnerable to red aviation lights, which can disorientate them and draw them into the path of moving turbine blades - a risk the developer has failed to assess.

Core Issues

- **Light Pollution:** Mandatory aviation lights will destroy the pristine dark sky experience vital for tourism and local identity.
- **Lethal Risk to "Night Flyers":** Species like the Manx Shearwater only return to nests in total darkness ; they fly at high speeds and cannot see turbine blades in the dark.
- **Underestimated Collision Risk:** The developer's reliance on daytime surveys ignores the significant nocturnal foraging activity of Kittiwakes and the erratic flight paths of Storm Petrels.
- **Total Omission:** No Lighting Impact Assessment, phototaxis study, or Dark Skies evaluation was included in the EIAR.

Technical Summary for Planning Officers

- **Omission of Material Impact:** There is a significant gap in the environmental evaluation regarding the nocturnal baseline. The EIAR fails to assess mortality pathways for SPA (Special Protection Area) species that are active at night.
- **Methodological Failure (Nocturnal Bias):** By relying on diurnal (daytime) observations, the applicant has systematically underestimated collision risk. There has been no site-specific study on the "attraction effect" of aviation lighting on nocturnal seabirds.
- **Non-Compliance with NPF4 Policy 4:** The "beyond reasonable scientific doubt" threshold required by the Habitats Regulations cannot be met while the impacts of high-intensity lighting on night-flying protected species remain unstudied.
- **The Precautionary Principle:** Scientific uncertainty regarding how these species navigate industrialised night skies necessitates a refusal of consent until robust, night-time impact modelling is provided.

12. Tourism

In Plain English Tourism in Lewis is built upon its wild coastline, pristine beaches, and sense of remoteness. The developer's own report admits that 86% of visitors travel here specifically for the scenery and landscape. This industry is a cornerstone of our economy, growing from £65 million in 2017 to over £81.5 million today, and supporting more than 1,000 local jobs. Despite this, the developer has refused to calculate how many tourists will stop visiting once the western seascape is industrialised. A landscape that is the primary "product" for the island's economy - now accounting for up to 16% of all economic activity - cannot be permanently transformed without first measuring the financial cost to local livelihoods. (Tourism facts source: 2023-2024 Tourism Economic Impact Study conducted for Visit Outer Hebrides and Comhairle nan Eilean Siar)

Core Issues

- **Economic Risk:** Given that 86% of visitors travel specifically for the scenery, the developer has failed to quantify the impact on a tourism sector now valued at £81.5 million annually.
- **Threat to Growth:** Tourism has seen a 25% increase in value since 2017 and is a designated "priority growth sector" ; industrialisation threatens the "unspoiled" character required to meet 2035 economic targets.
- **Loss of Appeal:** Industrialisation directly threatens the "near-pristine" landscape and dark skies that visitors specifically seek for well-being and astro-tourism.
- **Statutory Failure:** Ministers cannot satisfy their duty under the Islands (Scotland) Act 2018 without a full assessment of the project's impact on the island's economic wellbeing and tourism-dependent jobs.

Technical Summary for Planning Officers

- **Information Deficiency (GVA Impact):** The EIAR lacks modelling regarding how a "high magnitude of change" to the seascape correlates to a reduction in Tourism Gross Value Added (GVA). This is a material omission given tourism accounts for up to 16% of the island's economy (and over 40% in sensitive coastal sub-regions).
- **Omission of Dark Skies Sector:** The failure to include a specialised Dark Skies Assessment represents a significant gap in evaluating the impact on the island's growing astro-tourism and Northern Lights viewing economy.
- **Strategic Policy Conflict:** The Outer Hebrides Economic Strategy 2025-2035 identifies tourism as one of the top three "productivity step-change" sectors. By failing to quantify the negative impact on this priority sector, the applicant has not demonstrated that the project provides a net economic benefit as required by NPF4 Policy 11.
- **Non-Compliance with Islands (Scotland) Act 2018:** The absence of a compliant Island Communities Impact Assessment (ICIA) means the economic vulnerability of the tourism sector - a vital island interest - has not been legally evaluated, preventing a lawful determination.

13. Conclusion:

A Fundamental Failure of Sustainable Development and Statutory Compliance

The N4 proposal represents a direct repeat of the fundamental failures that led the Scottish Government to reject the AMEC/Lewis Wind Power application in 2008. In that landmark decision, Ministers established that the scale of industrialisation was simply too great to command community support or protect the unique integrity of the Isle of Lewis. Sixteen years later, that reality remains

unchanged, yet the legal framework for protection has grown significantly stronger. This decision is about the long-term survival of a landscape and a community that, once industrialised at this scale, can never be replaced.

In Plain English The developer is asking for a "blank cheque" of environmental and social destruction. By placing turbines of unprecedented scale so close to the shore, the project threatens to transform a unique sanctuary into an industrial zone. The submission is fundamentally incomplete, and by ignoring the legal lessons of the past and the tougher standards of the present, this project represents the wrong development in the wrong place.

Core Issues

- **The "AMEC" Precedent:** This project is a far greater violation of the legal threshold than the 2008 proposal, which was deemed an "unacceptable risk."
- **Cumulative Devastation:** The combined impact of offshore turbines and onshore infrastructure creates a "tipping point" that permanently erodes the island's environmental and cultural character.
- **Failure of Transparency:** By withholding the Social Impact Assessment and failing to quantify tourism losses, the developer has obscured the true human and economic cost.
- **Ecological Fragility:** The reliance on speculative data regarding protected birds, sharks, and carbon-rich peatlands creates a level of risk that no responsible authority can accept.

Technical Summary for Planning Officers

- **Consistency with Ministerial Precedent:** The 2008 rejection established that the Lewis Peatlands carry a "weight of importance" justifying refusal - a weight increased by **NPF4 Policy 1**.
- **Procedural Non-Compliance:** The failure to provide a compliant Island Communities Impact Assessment (ICIA) or the full results of the Social Impact Assessment (SIA) violates the **Islands (Scotland) Act 2018**, making a lawful determination not possible.
- **Failure of the "Rochdale Envelope":** The application fails to define a consistent "worst-case scenario," preventing a legally robust Appropriate Assessment.
- **Precautionary Principle:** Given the significant "Information Deficiencies," the competent authority is legally mandated to refuse consent under the **Habitats Regulations**, as the developer has failed to prove, "**beyond reasonable scientific doubt**," that the environment will not be irreparably harmed.

FORMAL REQUEST FOR REFUSAL

This application is procedurally, legally, and ethically unfit for determination. I formally urge the Scottish Ministers to **refuse this application in its entirety**. The proposed N4 Offshore Windfarm represents a fundamental breach of the National Planning Framework 4 (NPF4) and the National Islands Plan, as it seeks to impose industrial-scale infrastructure upon a sensitive landscape and an indigenous community without genuine, informed consent.

Should the Marine Directorate not move to immediate refusal, in light of the significant data gaps identified in this representation, I formally request that the Marine Directorate invokes Regulation 24 of the Marine Works (EIA) (Scotland) Regulations 2017 to 'stop the clock' on this application.

The current application is fatally undermined by the following factors:

- **Environmental and Social Data Gaps:** The absence of essential terrestrial data and a comprehensive Social Impact Assessment constitutes a major procedural defect. It is not possible to make a lawful determination on a project when the full extent of its damage - particularly to onshore communities and habitats - has been deliberately withheld or deferred.
- **Misrepresentation of Community Consent:** The application relies on a documented misrepresentation within the sectoral planning records claiming the local population is "happy" with this development. Proceeding with this application without correcting the record violates the Aarhus Convention and the core requirement for authentic public engagement.
- **Irreversible Material Harm:** The magnitude of the damage to our deep peat carbon stores, the rare machair habitat, and our internationally significant cultural heritage is too great to be mitigated. No amount of "community benefit" can compensate for the permanent industrialisation of a sacred landscape.

The N4 project is not a contribution to a "Just Transition"; when assessed against the statutory Development Plan and NPF4 Policies 1, 3, 4, 7, 13, 25, and 30, it is clear the proposal results in a "Net Loss" to the environmental, cultural, and socio-economic integrity of the Outer Hebrides. N4 would cause significant, cumulative, and largely irreversible harm to our living Gaelic culture, landscape, protected marine and bird life, heritage setting, and tourism economy. To approve it based on incomplete data and overwhelming community opposition would be a direct violation of the National Islands Plan and the core principles of NPF4.

I respectfully request that this application is rejected in its entirety.

Is mise, le urram

Signature:



Post Script: I write this objection in formal language that I sincerely hope will be taken seriously. I am aware that this representation is long and contains significant repetition and duplication; I offer no apology for this, as it is a necessary consequence of the project's scale. The same critical failures - such as the lack of baseline data and the disregard for cultural heritage - impact every distinct aspect of our environment and must be emphasised accordingly within each relevant policy test.

However, I also write it with a broken heart as to the distress, pressure, and sorrow that this proposal and other inappropriate past proposals (i.e., Amec Wind Farm and Flodaigh Ammonia Plant) and future impending proposals (i.e., Talisk, Uisenis Wind Farm, Druim Leathann, Grimshader and Heastabhal, Lewis Wind Power, Havbredey) are causing the people of Lewis. I, and many others, have had to try to protect our land from Amec, from Flodaigh, from N4, and no doubt there will be more, but the burden of time required to research and prepare accurate information to protect our heritage and argue our case against multinational companies (and our council) has been intolerable and detrimental to our wellbeing. This has been going on for years now, and yet we still face an existential threat to our environment, our culture, our economy, and our very way of life.

My full Gaelic patronymic is [REDACTED]
[REDACTED] In English, I am [REDACTED]
[REDACTED] I have direct oral connection to my great, great, great, great, great grandfather [REDACTED] I can stand in the footprint of his house and look out at the same wild Atlantic coastline that he looked at – this view hasn't changed in the generations that have passed. I am privileged to be able to walk on the same land that my people have walked on for centuries. There are countless numbers of my ancestors buried in the machair cemeteries along the west side of Lewis. I am connected in life and in death, in language and in soul to this place. I am indigenous, my people are indigenous and we have a vital, historical and spiritual connection to the land and the sea around us that is something rare in this modern age.

It is imperative that we do not destroy this precious, irreplaceable heritage for the profit of a foreign multinational, in the name of a "just transition" that is neither just for the local community nor truly restorative for the natural environment. For over a thousand years, my people have been guardians of this place, living in a model of genuine sustainability that respects ecological limits. This proposal fails to recognise that lived connection, treating our ancestral land and sea as a mere resource for exploitation while dismantling the very essence of the Gàidhealtachd.

I ask Scottish Ministers to understand that to approve N4 is to approve irreversible damage to the Gàidhealtachd - to our culture, land, heritage, language, and way of life. Do not force us to stand in our own homes and feel *cianalas* - a homesickness for a land that is changed beyond recognition, nor should we be driven from our homes because our environment and economy have been industrialised into collapse.

1. APPENDIX: Detailed Technical Evaluation for Planning Officers

2. The following policy tests and technical deficiencies demonstrate that the application is currently unfit for a lawful determination.
 1. **Overarching Policy Conflicts: NPF4 Policy 1 & 3**
 3. **Climate and Nature Crises:** The proposal fails the primary mandate of **NPF4 Policy 1**, which requires significant weight be given to the nature crisis alongside the climate crisis. The destruction of peatland, a critical carbon store, to facilitate a "low-carbon" development represents a fundamental policy contradiction.
 4. **Biodiversity Enhancement:** Under **NPF4 Policy 3**, developments must demonstrably leave biodiversity in a better state. The applicant's failure to properly identify protected species, such as coastal otters and basking sharks, prevents any robust assessment of biodiversity enhancement.

2. Procedural & Statutory Non-Compliance

- **Islands (Scotland) Act 2018:** The absence of a compliant **Island Communities Impact Assessment (ICIA)** is a critical statutory deficiency. Ministers cannot satisfy their legal duty to evaluate impacts on island-specific economic and social wellbeing without this assessment.

- **Non-Disclosure of Material Data:** The failure to publish the full **Social Impact Assessment (SIA)** constitutes a material omission. This lack of transparency regarding community mental health and "cultural loss" prevents a robust evaluation as required under **EIA Regulations**.
- **Project Splitting:** The severance of offshore and onshore infrastructure consents breaches **National Marine Plan Policy GEN 1** and Para. 4.77. Treating these as separate entities obscures the total cumulative impact on rare machair and peatland habitats. The authority should ensure that offshore effects are assessed cumulatively with the foreseeable onshore infrastructure required to make the project operational, so that the environmental effects of the project as a whole are properly understood.

3. Failure of Assessment Methodologies

- **The "Rochdale Envelope" Principle:** The Environmental Impact Assessment Report (EIAR) fails to consistently apply a "worst-case scenario". The use of a "flexible" design envelope without committed turbine dimensions undermines the reliability of all environmental impact conclusions.
- **Information Deficiencies in Ornithology:** The application fails the "beyond reasonable scientific doubt" standard of the **Habitats Regulations**. Specifically, the systematic underestimation of collision risks for species like Kittiwakes—due to a lack of nocturnal and storm-condition data—necessitates refusal based on the **Precautionary Principle**.
- **Acoustic Disturbance:** An **Appropriate Assessment** cannot conclude "no adverse effect" on the integrity of protected sites when high-energy hammer piling is predicted to disturb nearly 28% of the local bottlenose dolphin population.
- **A 2026 PLOS One study:** shows that long-finned pilot whales use the continental shelf edge and slope as key feeding habitat, yet the application does not adequately test effects on these offshore cetacean habitats. In those circumstances, the precautionary principle requires refusal or, at minimum, a much more rigorous assessment.
<https://www.hw.ac.uk/news/2026/study-sheds-new-light-on-the-feeding-behaviour-of-long-finned-pilot-whales>

4. Cultural Heritage & Seascape (NPF4 Policy 4 & 7)

- **Living Heritage:** The EIAR fails to assess **intangible and living heritage**, in direct conflict with **NPF4 Policy 7** and **HEPS**. It erroneously treats sacred sites, such as active cemeteries at Barvas and Dalmore, as static assets rather than places of ongoing community spiritual practice.
- **Interconnected Setting:** The **Seascape, Landscape, and Visual Impact Assessment (SLVIA)** fails to address the relationship between multiple **Scheduled Monuments** (e.g., the Calanais megalithic landscape) and their shared historical connection to the open Atlantic horizon.
- **Dark Skies:** The total omission of a **Lighting Impact Assessment** or phototaxis study for nocturnal seabirds represents a significant gap in the environmental evaluation, breaching **NPF4 Policy 4**.

5. Socio-Economic Impacts (NPF4 Policy 11 & 30)

- **Tourism GVA:** The applicant has not provided modelling to show how a "high magnitude of change" to the seascape correlates with a reduction in **Tourism Gross Value Added (GVA)**. Given tourism accounts for 16% of the island's economy, this failure to quantify negative impacts violates **NPF4 Policy 11**.

- **Fisheries Displacement:** The proposal fails to demonstrate compliance with **NPF4 Policy 11** and **NMP Policy GEN 4** regarding the availability of alternative fishing grounds and the resulting pressure of displacement.

6. Social Impact and Health (NPF4 Policy 14)

- **Material Omission of SIA:** The applicant's failure to publish the full results of the commissioned Social Impact Assessment (SIA) prevents the competent authority from assessing compliance with **NPF4 Policy 14**.
- **Health and Wellbeing:** Preliminary data indicates significant existing levels of stress and "cultural anxiety" within the West Lewis townships. Under NPF4, development must support positive health outcomes; by withholding the primary evidence of social harm, the developer has failed to meet the evidential threshold for this policy.

7. Landscape, Seascape, and Interconnected Setting (NPF4 Policy 4 & 7)

- **Visual Dominance:** The proposal fails the **NPF4 Policy 4** test regarding the protection of "Natural Places." The industrial scale and coastal proximity result in a magnitude of change that overwhelms the natural character of the Atlantic seascape.
- **Megalithic Landscape Integrity:** Contrary to **NPF4 Policy 7**, the SLVIA treats individual Scheduled Monuments as isolated points. It fails to assess the "Interconnected Setting"—the functional and spiritual relationship between monuments (such as the Calanais Standing Stones) and the open, undeveloped Atlantic horizon.
- **HEPS Compliance:** The application fails to demonstrate that the industrialisation of the horizon respects the historic environment as a "living" cultural asset

8. Construction, Pollution, and Water Quality

- **Post-Consent Deferral:** The developer's reliance on future Construction Environmental Management Plans (CEMPs) to mitigate pollution risks prevents a robust current assessment.
- **Sediment and Chemical Risk:** In the high-energy environment of the West Lewis coast, the lack of defined emergency contingency plans for sediment plumes or chemical spills represents a failure to safeguard water quality under the **Marine (Scotland) Act 2010**.

9. Fisheries and Marine Protected Species

- **Cumulative Socio-Economic Harm:** In breach of **NMP Policy GEN 4**, the developer has failed to prove that alternative fishing grounds are viable, ignoring the cumulative pressure on the local fleet.
- **The "EPS" Legal Threshold:** The developer acknowledges the need for European Protected Species (EPS) "harm" licenses for cetaceans while simultaneously claiming "negligible" impact. This creates a legal contradiction that fails the **Habitats Regulations** test.

10. Onshore Infrastructure and Peatland (NPF4 Policy 3 & 5)

- **Carbon Sequestration Failure:** **NPF4 Policy 5** protects carbon-rich soils. The proposed excavation of deep blanket bog on Barvas Moor for cabling and substations would result in a carbon debt that contradicts the project's renewable energy justification.
- **Machair Protection:** The failure to assess impacts on irreplaceable machair habitats at the landfill point constitutes a direct breach of **NPF4 Policy 3**.

11. Nocturnal Impacts and Dark Skies (NPF4 Policy 4)

- **Omission of Lighting Assessment:** There is a total absence of a **Lighting Impact Assessment** regarding high-intensity red aviation lighting.
- **Phototaxis and Mortality:** The developer has failed to assess the "deadly lure" effect on nocturnal species (Manx Shearwater, Storm Petrels) and the night-foraging habits of Kittiwakes. This creates "reasonable scientific doubt," mandating refusal under the **Precautionary Principle**.

12. Tourism and Economic Viability (NPF4 Policy 11 & 30)

- **Strategic Economic Conflict:** The proposal undermines the **Outer Hebrides Economic Strategy 2025-2035**, which identifies landscape-based tourism as a priority growth sector.
- **GVA Methodology Failure:** By refusing to calculate the reduction in Tourism Gross Value Added (GVA) resulting from the industrialisation of the seascape, the developer has failed to prove a "net economic benefit" as required by **NPF4 Policy 11**.

13. The 2008 Precedent and Modern Statutory Duty

- **Material Precedent (AMEC 2008):** The 2008 ministerial refusal of the Lewis Wind Power application established that the ecological and community integrity of this region is a "national interest" that overrides energy production.
- **NPF4 Policy 1 (Priority):** This policy mandates that the nature crisis must be given significant weight. The proposal's impact on SPA-integrity and peatland health means it fails this primary NPF4 test.
- **Statutory Request (Regulation 21/25):** Due to the material lack of terrestrial data, social impact evidence, and nocturnal studies, the Marine Directorate is urged to "stop the clock" or refuse consent on the grounds of an incomplete and legally deficient evidence base.

Member of the public 2269

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] Email: [REDACTED] Date: 07/05/2026

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.'*

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 i *'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.'*

My further objection points:

Following are my Higher English, Higher Gàidhlig, and National 5 Geography assignments, it should be obvious from how much time and effort I put in to researching the impacts of this proposed development that I feel very strongly on its negative impact on my community and my culture. Please show me the courtesy of reading each of these, if you cannot read the Gàidhlig one please translate it.

Thank you

Greed in the Guise of Green

In recent years 'Greenwashing' has become endemic. Companies, Governments, and celebrities have tried to prove they have green credentials by 'offsetting' their carbon footprint by investing in 'green' initiatives. On the surface this might seem great but many of these initiatives are not as environmentally friendly as they would appear at first glance. Multinationals and rich individuals have purchased vast swathes of land for afforestation projects. The oil giant Shell and Danish billionaire businessman Anders Povlsen - Scotland's richest man and largest landowner - are among those who have earned the derisory nickname of 'Green Lairds'. Their rationale is that they can continue polluting the land, sea or air as long as they plant enough trees to 'cancel out' their carbon footprint. If only it were that simple! Mass tree planting is usually monoculture, rarely including native species, and pushes farmers and families off land. A modern-day clearance. The media and public are beginning to see these schemes as the scams that they are, but large-scale afforestation is by no means the only form of environmental trickery that is posing a direct threat to our rural communities. Industrial scale wind projects both onshore and at sea are another way in which those with power and wealth can make vast sums of money whilst at the same time purporting to be protecting the planet.

In 2008, islanders on the westside of Lewis breathed a sigh of relief when plans for a 181-turbine wind development were rejected by the Scottish Government. This followed a long battle with the developers and their supporters, the local council and the landowner, The

Stornoway Trust. Their support was used by the developers to suggest community support. However, the fact that ‘nearly 11,000 islanders had objected to the scheme’ was proof that the council was not acting in the voice of the people. Cash strapped councils are easy prey for companies with wads of cash. Today, communities from Borge to Bernera and beyond are once again faced with a depressingly familiar fight. Northland Power, a Canadian multinational, has proposed plans to construct 66 massive wind turbines, the closest of which will be only 4.5km from shore, just 2.43 nautical miles. Curiously, this location did not feature in the original scoping report which proposed a number of possible sites. The Islands (Scotland) Act 2018 makes clear that any development of the seabed within 12 nautical miles of an island ‘may only be designated upon application by a Local Authority’. *Eilean mo Ghaoil*, a community group opposed to the development, have said that ‘this implies that Rural depopulation in the islands is huge. The survival of crofting communities in the islands depends on young people wanting to stay in the communities they were raised in. Comhairle nan Eilean Siar asked for this inshore site to be developed’. It begs the question what could possibly motivate a Local Authority to do something so divisive? Was there perhaps a mighty financial incentive? An offer they couldn’t refuse?

The scale of the proposed development is startling. The visual impact of 66 turbines in an area approximately 161km², each 380m high, cannot be underestimated. Lewis is not a mountainous island but it is not flat. The turbines will be 10 times higher than the lighthouse at the Butt of Lewis. Beinn Bhradhagair, one of the highest hills on the westside of the island and a notable landmark, at 262m, will also be dwarfed by the turbines. Locals and genuine environmentalists alike worry that these alleged ‘green’ renewable energy wind turbines will be a disaster for both the environment and local community. Indeed, the Scottish Government’s Environmental Assessment for the site warns that ‘there is potential for significant effects on population (noise impacts), navigational safety and visual effects.’ It has been reported in the *Journal Environmental Disease* that ‘the weight of evidence indicates occurrences of adverse health effects from living and working near industrial wind-turbines.

The noise and visual impact of these gargantuan turbines will deter people from settling in affected areas and may push others out. The impact on the many who earn their living through tourism will be huge. Many are crofters, who have to earn money to support a way of life already at risk. The turbines will be visible - and audible - from the blackhouses of Arnol and Gearranan, the Carloway Broch and the world famous Callanish Standing Stones. From the Butt to Bernera, visitor numbers will drop significantly. Visitors themselves are already telling their hosts this frightening fact. Tourists come to the area to enjoy unspoilt and unparalleled landscapes and seascapes and to feel at one with nature. The wild open ocean of the westside of Lewis is literally the edge of the world - next stop Newfoundland. The famous peace and quiet of island life that people seek, will be no more. A towering forest of turbines will repel the visitors once attracted to the remoteness and uniqueness of the place.

The parish of Barvas has the highest percentage of Gaelic speakers in Scotland (and, as such, in the world) at over 64% of the population. All of the villages in Barvas Parish are directly impacted by this development. If local people move away or students choose not to return home then the lifeblood of these villages and communities will be lost. The last stronghold of the Gaelic language will be destroyed. The Gaelic language and culture should be protected by the Unesco 2003 Convention for the Safeguarding of the Intangible Cultural Heritage. The UK government finally ratified the Convention in June 2024. The fact that it had failed to sign up to the convention prior to this, when the disastrous decision to allow this project was made, does not let those decision-makers off the hook. Both our living heritage and our environmental heritage are in peril from N4.

One of the longstanding arguments in favour of offshore wind-turbines is the claim that they have less of an environmental impact than those on land. UNESCO describes the oceans as ‘the largest ecosystem on Earth’ and home to 94% of all living species. In addition, ‘the

shallow waters of coastal seas are home to 90 per cent of all marine species.’ These statistics make a mockery of the idea that offshore wind turbines are not damaging for the environment. The industrialisation of the seabed is having a major impact on marine life. A recent study found that ‘turbines themselves might serve as a stepping stone to non-indigenous species’ and warns that complex food webs could be jeopardised. The authors warn that the long term effects of these large-scale developments are unknown and they deserve greater levels of research before irreparable damage is wreaked. Another claim is that offshore wind-turbines are more efficient than those onshore, because higher wind speeds require fewer turbines. The reality is that higher wind speeds, strong seas and difficulty accessing the turbines can cancel out this theoretical advantage. Wind-turbines remain inefficient and expensive.

The Northland development has had a negative effect on population even at the planning stage - whether or not they ever get approval damage has been done. The very idea of such a monstrous intrusion in their lives is enough to deter young families and potential returnees from coming ‘home’, which will have a devastating effect on both Gaelic and crofting. Depopulation in the islands is already dire. The survival of crofting communities in the islands depends on young people wanting to stay in those communities in which they were raised. Why will people want to stay when their communities offer them all of the disadvantages but none of the advantages of island life? Short-term cash windfalls blind people in power to the long-term damage that large-scale wind-turbines do to the environment and local communities. We are in a climate crisis. Weather across the globe is becoming more extreme. Fires, floods and famine are just some of the challenges the world is facing because of rising temperatures. The battle against global warming is real and there is a race to find solutions to halt, or reverse, the negative effects of traditional energy sources by creating ‘green’ energy. But just because something is marketed as ‘green’ or ‘renewable’, do not assume it is good for the environment. Causing irreversible damage to the seabed and marine ecosystems and lasting damage to a language and way of life under the guise of green is not the answer. It is yet another example of the exploitation and silencing of an indigenous community in the name of greed.

An droch bhuaidh a bhios aig rothan-gaoithe mara air cànan is cultar nan Gàidheal

Tha fhios againn uile gu bheil a’ Ghàidhlig ann an staid cunnartach. Tha an àireamh de luchd labhairt air a bhith a’ fàs nas lugha thairis air na bliadhnachan. Gu sonraichte, tha an crìonadh ann an luchd-labhairt dhùthasach a’ toirt buaidh mhòr air cànan agus cultar nan Gàidheal.

Mar sin, tha e deatamach gu bheil sinn a’ dèanamh a h-uile càil as urrainn dhuinn an cànan agus an cultar againn a’ chumail beò - gu h-àraid anns na h-àitean far a bheil Gàidhlig fhathast mar chànan laitheil, nàdarrach agus air fhighe a-steach dhan choimhearsnachd.

Carson a-rèiste a tha Comhairle nan Eilean Siar agus Riaghaltas na h-Alba a’ leigeil le companaidh cèin ar cànan ‘s ar cultar a chuir ann an cunnart.

Cha robh ach beagan a bharrachd air 57,000 luchd-labhairt Gàidhlig anns’ a chunntas-shluaigh mu dheireadh. Chan eil sin ach beagan a bharrachd air 1% den t-sluagh. Ach chan eil an aon dealbh air feadh na dùthcha. Tha Gàidhlig aig còrr air leth de shluagh na h-Eileanan an Iar. Tha sin faisg air deich uiread an àireamh sa cheud de luchd-labhairt na Gàidhlig air a’ Ghaidhealtachd agus barrachd air deich uiread an àireamh sa cheud de luchd-labhairt ann an Earra-Ghaidheal is Bòid, àitean eile far a bheil Gàidhlig fhathast gu ìre làidir.

Tha tachartasan sònraichte ann an eachdraidh na h-Alba air droch bhuaidh a' thoirt air cànan is cultar nan Gàidheal. Am measg, Reachdas Eilean I ann an 1609, na Fuadaichean (1750-1860), Achd an Fhoghlaim (Alba) 1872, agus adhartasan teicneòlach a' fàs cumanta – leithid telebhisean aig deireadh 20mh linn agus an eadar-lìon aig toiseach 21mh linn. Ach tha fìor chunnart ann gu bheil fuadaichean ùra a' tighinn chun a' Ghàidhealtachd fo sgàil luth 'uaine'. Mar a thuirt mi roimhe, 's e na h-Eileanan an Iar aon de na daingnich mu dheireadh aig a' Ghàidhlig – ach tha an dùmhlachd as àirde de luchd-labhairt sa Ghàidhlig san dùthaich, 's mar sin air an t-saoghal, ann am paraiste Bharabhais air taobh siar Eilean Leodhais. Mar sin, tha e cho duilich agus do-chreidsinneach gu bheil an làrach airson na rothan-gaoithe brùideil N4 a tha san amharc far a' chladaich air taobh siar Eilean Leodhais, agus paraiste Bharabhais teas-meadhan an raon far am biodh am buaidh as miosa. Tha cead aig a' chompanaidh na rothan-gaoithe biastail a' chur an àirde dìreach 4.5 cileameatair bhon chladach – chan eil sin ach beagan a bharrachd air dà gu leth mhìltean.

'S docha gu bheil thu a' faighneachd carson a tha seo gu bhith dona airson a' Ghàidhlig? Tha iad ag radh gum bi tòrr obraichean ann agus nach eil obraichean a' ciallachadh daoine? Uill, 's e an ceist, cò dhà am bidh na h-obraichean seo a' dol? Leis an fhìrinn innse bidh a' mhòrchuid de na daoine a gheibh obair bhon phròiseact uabhasach seo nan coigrich agus bidh iad a' lagachadh an cànan gu mòr. Ceist chudthromach eile – dè thachras do mhuinntir an àite a bhios air am beòshlaint bho thurasachd agus iasgach a chall? Tha e foillaiseach gun tig lughdachadh air an àireamh de luchd-turais a bhios a' fuireach anns na sgìrean far am biodh na rothan-gaoithe oillteil rim faicinn – agus rim cluinntinn! Tha rannsachadh ag innse seo dhuinn. Tha an luchd-turais fhèin ag innse seo dhuinn! Bidh an luchd-turais a tha a' tighinn chun an Taobh Siar an dràsta, airson tlachd fhaighinn as na seallaidhean-tìre àlainn agus na seallaidhean-mara fosgailte, a tha chun a seo gun mhilleadh, a' dol gu àitean eile far am faigh iad an t-sìth agus an t-suaimhneas a tha iad a' sireadh.

Bidh tòrr dhaoine anns na sgìrean dùthchail air taobh siar Eilean Leodhais a' faighinn tuarasdail bho thurasachd, leithid bho thaighean saor-làithean a thoirt seachad sair màl. A bharrachd air airgead a dhèanamh às, airson cuid, 's e seo an aon dòigh airson taighean theaghlaich a chumail anns an teaghlach airson an ath ghinnealach – oir aon uair 's gu bheil taighean air an reic tha e tòrr nas duilghe taigh a cheannach aig àm nas fhaide air adhart. 'S e an seòrs' turasachd seo dòigh airson an coimhearsnachd a' cumail slàn, ach gun an t-airgead sin a' tighinn a-steach dhan choimhearsnachd 's cinnteach gum bidh daoine aig a bheil Gàidhlig dùthchail làidir a' falbh agus gum biodh an àite agus an cànan nas miosa dheth as aonais. Tha seo a' ciallachadh, feidhir mar a bhios iad a' dèanamh sgrios air an àrainneachd, gum biodh na rothan-gaoithe a' dèanamh sgrios air an cànan agus air cultar nan Gàidheal cuideachd.

A-rèir choltais bidh iasgairean a' faighinn airgead-diolaidh airson gun a bhith ag iasgach. Ach chan eil an airgead-diolaidh sin gu bhith gu feum airson an cànan agus an dualchas luachmhor againn a' cumail fallain. Tha Gàidhlig aig a' mhòr-chuid de na h-iasgairean air taobh siar an eilein agus tha beartas fhaclan agus abairtean aca agus cuideachd eòlas air na cladaichean agus na cuantan a thèid a chall gu bràth ma stadad iad ag iasgach anns na h-uisgeachan ionadail seo. Tha na rudan sin prìseil agus chaidh *An Cumhnant airson dìon Dualchas Cultarail Do-Bheantainn* air a dhearbhadh ann am Breatainn anns an t-Ogmhios 2024 air sgàth 's cho cudthromach 's gu bheil dualchas mar mion-chànain. A bharrachd air measadh buaidh àrainneachdail a dhèanamh tha còir aig comhairleachan measadh buaidh cultarail a dhèanamh cuideachd.

Tha rudeigin eile a' cur nan eileanaich às an ciall agus 's e sin an ainm ùr a thòisich an companaidh air cùl na rothan-gaoithe a' cleachdadh – *Spiorad na Mara*. 'S e *Northland Power* an ainm aig a' chompanaidh anns a h-uile h-àite eile agus chan eil ceangal sam bith aca leis a' Ghàidhlig neo le Gàidheil. Mar sin, tha daoine a' faicinn an ainm ùr seo mar seilbheachadh cultarach gus am faic daoine iad ann an dòigh fabharach. Tha còmhlan ionadail *Face the West* air feuchainn ris an abairt seo fhaighinn air ais le bhith a' cur a-mach òran a sgrìobh boireannach às a sgìre, leis an tiotal 'Ar Spiorad na Mara'. 'S e òran cianail a th' ann a tha a' moladh a' mhuir bhrèagha againn, a nàdar luachmhor agus spiorad nan eileanaich. Mar iomadh tachartas brònach ann an eachdraidh nan Gàidheal tha an sgeul seo air fhighe a-steach do seanchas agus seann tradaisean nan òran.

Ann an co-dhùnadh, bu choir dha an Riaghaltas agus a' Chomhairle aire a thoirt air am buaidh a bhios aig a' phròiseact eagallach seo air dualchainnt agus dualchas na sgìre, mar thaobhan de dhualchas neo-bheantainneach a bu chòir a bhith air a dhìon fon lagh. Tha còir aca stad a chur air a' phròiseact gu lèir. Tha na rothan-gaoithe gu bhith fada ro fhaisg air na coimhearsnachdan làidir Ghàidhlig a tha ri lorg fad an t-slighe eadar Uig agus shìos an Taobh Siar gu Nis. Bidh iad nas fhaisge na bhios cuideigin aig aon cheann den bhaile beag agam fhìn bho chuideigin aig an ceann eile. Am baile agam fhìn, Bradhagair, baile beag bòidheach air taobh siar Eilean Leodhais, far a bheil Gàidhlig air a bhruidhinn gu farsaing agus gu tric. Aon uair 's gu bheil na rothan-gaoithe air an togail agus air an suidheachadh aig muir thig buille air a' chànan, 's an cultar agus na coimhearsnachdan gu lèir anns an sgìre a bhios a' dèanamh milleadh gu bràth tuilleadh.

Northland power should not be allowed to go ahead with their plans for the N4 wind development off the west coast of Lewis without community consent

Northland power is a Canadian company who have plans to plant 66 offshore wind turbines off the west coast of the Isle of Lewis (N4). Northland claims to produce clean, green, renewable energy. But the majority of the local community doesn't believe that they will be as green and eco friendly as they are made out to be. The power and the money that they will generate will also not go towards the local community or even benefit Scotland

Initially when Northland were scoping for a site to put the windfarm they were far further away from the coast than they are planning to put them now. Locals are worrying that these so called 'green' renewable energy wind turbines will be a disaster for both the environment and the local community.

The area where the turbines will be located (the Array area) is in inshore waters only 4.5km from shore and stretches 20 km parallel with the coast. However, the visual impact will be felt much wider. Northland powers own scoping report acknowledges that the turbines may be visible from the Butt of Lewis in the north of Lewis to the Point peninsula in the east and all the way to the South Lewis, Harris, and North Uist NSA (National Scenic Area).

Many of the Isle of Lewis' most visited tourist attractions are situated on the west coast of the island. These massive wind turbines will be seen from the 2000 year old Calanish standing stones, the iron age broch at doune Carloway, the Gearanan Blackhouses, Norse Mill in Shawbost, the Whalebone Arch in Bragar, the historic Black houses in Arnol, and from all the beautiful beaches along the west side of the island. The size of the proposed wind turbines would dwarf and dominate the features of the relatively low-lying landscape of northern Lewis.

The N4 site did not appear in the original Scoping Area of Search and was only identified as a Plan Option Scoping Area of Search. Because N4 is in within 12 nautical miles of an island, the site could only be designated for development if the local authority concerned applied for the permission. This means that Comhairle nan Eilean Siar must have instigated the planning application process for the N4 site to be developed.

The Scottish governments sectoral marine plan for offshore wind energy recognises the potential environmental and visual impact on landscape and seascape, and emphasises that local communities should be informed and consulted and throughout developments such as N4. The public body NatureScot also advise consultation with affected communities and they highlight noise pollution and navigational safety along with the visual impact.

Northland Power have rebranded themselves as Spiorad na Mara, which means Spirit of the Sea in Gaelic. This has angered some local people who see it as cultural appropriation and an attempt to give the plan a local feel, when in reality it is being imposed on the local community by a foreign multinational company with no connection the Hebrides or Gaelic.

A pressure group has been established by concerned locals to keep the community informed about N4. They have called their group Eilean mo Ghaoil: Save our Island. I have interviewed members of the group but they have asked not to be named. The reason they give for remaining anonymous is that many of them are employed by the local council and are worried about repercussions if they are known to be vocally opposing the development, and that it might impact their own jobs or that of family members. Campaigners are concerned that there has been no consultation of affected communities. They do not believe that the council is representing their interests there are concerns about effect this could have on the Gaelic language and the sustainability of the community itself. They argue that the development is motivated by greed and financial gain and not about sustainability or tackling global warming. They claim the development exploits the island community and that it is being used as a source of energy to power the south of England with no regard to the long term damage and devastation that will be caused by such a development.

To ascertain community opinion regarding N4 in my own village, Bragar, I carried out a survey. Bragar is one of the communities directly affected by the development. I spoke to 20 locals I met out and about in the village over one weekend, and have analysed the results. The gender balance was fairly equal with 11 females and 9 males responding. 40% were aged 18-34; 35% were aged 35-59; 25% were over 60. Everyone I spoke to had heard about the development. None of the respondents believed that the views of the local community and just one was in favour of the development, with 19 people surveyed being against the development (95%). 19 people were of the opinion that the development would be detrimental to the local community and NONE thought that the local community would benefit from the scheme. Four respondents (20%) indicated that they had attended 'information sessions' held by Northland but they stressed that these were not community consultations as their opinions were not sought.

The survey responses suggest that there is strong local opposition to the development, and that this is not dependant on factors such as age or gender. Reasons respondents gave for their opposition to the development included concerns about the visual and environmental impacts of the plan, the negative impact it would have on the community, the financial benefits would not be felt locally but would go to a foreign company, that the energy produced would not benefit local communities and that it could ultimately result in depopulation and a decline in tourism.

In conclusion it is evident that in this case the local island communities affected by this large scale wind development have not been consulted prior to or during the planning process for the proposed N4 development. Information sessions were not widely advertised and did not seek the views of the community. If my survey of the Bragar community is representative of other affected communities it would appear that there is huge opposition to this development. Before any development goes ahead in this onshore are the Scottish Government and CnES should make sure that the voices of local people are listened to and that genuine consultation goes ahead. The damage caused by a development of this scale will

be irreversible and the costs and benefits to the community should be transparent.

Member of the public 2270

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] Email: [REDACTED] Date: 23/06/2006

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.'* **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.

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***Signature:**(type your name here) [REDACTED]

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Member of the public 2271

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]

Postcode: [REDACTED]

Email: [REDACTED] Date: 7 May, 2026

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

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X

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Member of the public 2272

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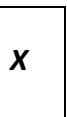
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My address: [REDACTED]

Postcode: [REDACTED]

Email: [REDACTED]

Date: 3/5/26

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

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Photomontage visualisation by Northland Power - Barvas

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Photomontage visualisation by Northland Power - Barvas

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.'

My further objection points:

This project is immoral in every way. Pushed through on greed and lies. It is funded by us, the taxpayers by subsidies given to shareholders from other countries because wind farms don't make a profit. This is ~~treasonous~~ treachery by our members of parliament and our councillors. The windmills are not designed to be placed this close to land. They are known to cause health problems to people, not to mention the trouble put on the population in simply installing these monstrous things. This is the highland clearances all over again. All the damage and upheaval will be paid for by us, in money, inconvenience, overstretched infrastructure etc. The list goes on! It's evil and cruel and wrong.

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:

Print name:



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

Member of the public 2275

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: MD-00011742 & MD-00011743 - Spiorad na Mara - West Coast of Lewis Windfarm
Date: 01 June 2026 18:44:30

Good afternoon,

My name is [REDACTED], originally from the Isle of Lewis and, although I am now based on the mainland, my home remains in [REDACTED]. I am writing to express my general support for the Spiorad na Mara development and the wider transition to renewable energy.

Recent global events have only reinforced the importance of energy security and sustainable generation, and I believe this project represents a thoughtful balance between environmental responsibility and respect for the island's culture and heritage.

As someone with deep roots in the community, I appreciate the project's commitment to working collaboratively with local people and honouring the traditions of the island. These must become more tangible and trusted, however.

There are legitimate concerns here about the extent to which traditional ways of life will be eroded, but that has always happened; the developer appears to be taking cognisance of these concerns. There are long memories here of being let down - either by developers or government - in the past.

Firm, cast-iron guarantees about community benefits that are legally binding, in the form of recurring cash, not just soft benefits, will be required to help us address some of the ingrained deprivation in our island.

We will be paying the cultural and topographical price for the effect on our sea and landscapes, not the developers and not Edinburgh-based politicians.

Government net zero targets are laudable, but you must ensure that the communities that are, in effect, helping you to meet targets are properly compensated for facilitating that.

With Best Wishes.

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#); [MD Marine Licensing](#)
Subject: MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis
Date: 07 May 2026 23:13:14

From [REDACTED]
[REDACTED]

Email [REDACTED]

Date 7 May 2026

Objection

I write to formally object to the above project application.

This objection is written from a spiritual perspective - namely from myself on behalf of spiritual adherents of a Traditional Druidic Group - Duir Leodhais whose members reside on the Isle of Lewis and on the mainland.

Who We Are

Our Way is to embody a spiritual connection with the landscapes and seascapes of our ancestors, the sites named and used by them for ritual purposes and the revolving wheel of life through the Waters of Life, The Sacred Fire and The Gateway. We hold a yearly ritual cycle and draw from encoded knowledge that lies within orally transmitted myths and poems.

The Meaning of the Sea in our Tradition

The Sea is synonymous with the medium of passage to the Otherworld - Tir Na Nog. These sea lochs were named by our ancestors who travelled here from Ireland. The Spirit of Manannan permeates these waters round Lewis and manifests its presence in the lives of those who connect to the Old Ways here.

The Landscapes here contain features named by our ancestors who came here from Scandanavia. There are many sites made by our Mothers & Fathers whose names are lost that overlook the sea and are enframed by it. Steinacleit is a fine example. In modern parlance the sea forms an essential part of their setting. It is important to realise that this is a lived spiritual reality for members of our group and others like us. Having met people visiting sites here over the years we know that there are many kindred spirits who are members of other groups, such as the Order of Bards, Ovates and Druids, or who are solitary seekers for whom the above matters also hold true.

A development of this type and scale would damage the connection of the Sea with the landscape, the ritual sites and ourselves as Druidic practitioners. The energy of the sea will be supplanted. The presence of deity will be obscured or even dismembered. It is

important to realise that, bar natural processes of change, the land and seascapes in this area have been unchanged since the time of the earliest inhabitants. This is a sacred place that reaches back to our ancestors. Mega-industrial development is not compatible with this reality.

I think you can appreciate why I have not referred to the development by its given name in the body of this text. The true Spirit of the Sea lies with our Celtic deities and elemental spirits.

Effects of this nature on the lives and practices of those living and visiting here have not been addressed in the EIAR. Consenting this project would be counter to 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.'

I respectfully submit this representation to Scottish Ministers. It is by your conscience and your authority that you act on behalf of the people of Scotland and all parties who will be affected by your decision to either grant consent to this development or refuse consent to the same.

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.

I want my personal details to be kept confidential.

Member of the public 2277

From: [Redacted]
To: [MD Marine Renewables](#); [MD Marine Licensing](#)
Subject: MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis
Date: 07 May 2026 19:53:12

From [Redacted]
[Redacted]
[Redacted]
[Redacted]

Email: [Redacted]

Date 7 May 2026

I formally object to the above application.

Reasons.

1. Community Engagement has been flawed

a. The Scotwind scoping survey of 2018 for the SMP-OW did not feature human population effects except for effects on recreational water users. Therefore the only locations for offshore sites that would be considered would be ones which had no health or social effects on populations on land. The N4 area was not included.

Correspondence from [Redacted] of MPP with [Redacted] MSP on 11 August 2022 (Marine Planning and Policy correspondence reference 202200311672), states that the N4 site was originally not in the scoping survey due to considerations around visual impact but was brought forward to the draft plan stage only after "views expressed after consultations with statutory bodies and key stakeholders". These bodies and stakeholders were explained by [Redacted], Marine Planning Specialist (Offshore Renewable Energy), to be the Comhairle nan Eilean Siar (CnES) and offshore wind construction companies. The local community was not engaged with.

The assertion by CnES that there was community support for sea based turbines within inshore waters is not evidence based and is spurious as there were no direct consultations with the Island Communities at this time.

Furthermore, [Redacted] of NatureScot stated that NatureScot was not consulted on the visual impact of N4 during the scoping survey time frame. As NatureScot is the body which advises on visual impact for Scottish Government, [Redacted] statement is inconsistent with Marine Scotland's account.

b. The 2020 Government Consultation for the Scotwind and the N4 Plan Option was flawed, during consultation on Isle of Lewis there were 15 attendees only at the

daytime/evening event in Stornoway. Of the individual responses nationwide only 15 people objected strongly to N4. I know of 15 people on the road I live on who are strongly opposed to SNM.

The Consultation to the forthcoming Revised Sectoral Marine Plan for Offshore Wind shows what that public opinion is against SNM as half of all individual responses to the Plan objected to N4. Additionally an online survey of the residents of the West Side of Lewis by EMG-Lewis.co.uk which shows that 88% of residents are against the development.

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.' Clearly SNM does not fit with this vision.

Proper community engagement has been further disregarded as SNM does not fit with the Purpose and Vision Draft Sectoral Marine Plan for Offshore Wind 2020.

The Purpose and Vision was stated as:

"This Plan seeks to contribute to the achievement of Scottish and UK energy and climate change policy objectives and targets, through the provision of a spatial strategy to inform the seabed leasing process for commercial offshore wind energy in Scottish waters, which; Minimises the potential adverse effects on other marine users, economic sectors and the environment resulting from further commercial-scale offshore wind development; and Maximises opportunities for economic development, investment and employment in Scotland, by identifying new opportunities for commercial scale offshore wind development, including deeper water wind technologies."

The clear omission of the minimisation of potential adverse effects on land based populations from the Purpose of the Draft Plan indicated that N4 should not have been included as a Draft Plan Option.

c. The Consultation response of CnES to the Draft SMP-OW 2020 was flawed.

The Comhairle's stated that:

"The local population is therefore prepared for, and supportive of, large scale deployment of Offshore Wind off Lewis".

This is a spurious statement in relation to N4 because it was based the responses from the community to the consultation event in Stornoway 5 March 2020, considered

above, and also to community responses to a report for Members titled ScotWind Offshore Leasing

Round, in December 2020. This is a pdf titled as I 9A and can be found at www.cne-siar.gov.uk

[Redacted], Strategy Manager with CnES, says this report was placed in the public domain and

that “The characteristics and exact location of each draft Plan Option were detailed in the report

papers”. However the only reference of the location of N4 was that it is closer to shore than the other Plan Options, which is vague. The map of the marine area surrounding Lewis which shows the local Plan Options is also given without a scale.

d. The designation of the capacity of the site has never been a subject of consultation. There are two options described for this offshore array. Both of them are contingent upon maximising the designated capacity of the site to output electricity. This capacity has been predetermined by an unseen and unexplained process which to my knowledge has not utilised any community consultation process. It is clear from the recommendations of NatureScot regarding N4 that it views this development similarly to ourselves but was unable to recommend against carrying N4 forward as a plan option OR reducing the capacity of the site to a more appropriate level given its proximity to shore. The recommendation to the developer to take opportunity to engage with the community on a design-led approach is essentially a lack of meaningful input on behalf of NatureScot as it does not address the critical issue of site capacity and is also presumptuous of the community finding any development of N4 as being acceptable. Again I refer to the SMP-OW 2020 consultation as having a null result as regards public engagement whereas subsequent data from the revised SMP-OW 2025 consultation and the online West Side survey of emg-lewis.co.uk show a huge proportion of the populace rejects the development

e. The failings of Northland Power in their community engagement

[Redacted], Project Manager with Northland Power, has made a blunt response when challenged, by myself at a public consultation event in 2023, about the recommendation from NatureScot for due consideration of turbines of height lower than 200m. He simply said “that says 'due consideration' so we don't have to do that”. This sums up Northland Power's (NP) approach which is to consider how they are constrained by official bodies, statutes and policy rather than engage meaningfully with the local community. Some further examples:

- I. At no stage during the four year pre-application public consultation phases, did NP quite a five year construction period for the offshore array.
- II. No targeted engagement with the community on the specific sensitivities of crofters was made.
- III. No targeted engagement with the community on the impacts on the historicity and spiritual life of community members was made.
- IV. The results of the EIA of the SMP-OW as regards N4 was referred to as "nothing to do with us" by representatives at community engagement events.
- V. Community engagement events were run at venues with no signage and where venue car parks were sometimes full of vehicles which had been parked by staff who were running the event.
- VI. Northland Power representatives have been vague and deceptive in their analyses of consultation responses , both first and second phase, through a lack of quantification of consultation responses from the community members. [Redacted] in particular is quoted as stating that "numbers of those objecting to the development have not been made available because it was not possible to compile such detailed statistics."
- VII. I have been very engaged with the events and paperwork of the public consultation process conducted since June 2023. There has been a dearth of engagement with the public on the subject of alternatives to this project development.

All the above is contrary to the following Government Policies.

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.'

In light of the above I request that the application be refused by Scottish Ministers.

2. Visual Impact:

The visual impact of this development will be on the residents, those who visit the area. This impact has unique aspects to it due to the combination of the sensitivity of the environment, the local culture including the indigenous population and the archaeological heritage of the area.

Reasons that Spiorad Na Mara would create too high a visual impact.

a. The Coastline here features machair. Council's own LDP which states: "There are key views along the coast and out to sea. It is very important that the scale, form and style of structures relates to traditional buildings, even if of a contemporary design, to retain the cohesiveness of settlements and the distinct character of the machair." SNM, though sited in the sea, clearly breaches this directive.

b. The setting of 24 scheduled monuments and many archaeological sites will be drastically altered by the development of SNM. Some of the types of archaeological sites and monuments that will be affected are listed by HES however there is no indication made of the richness of the heritage due to the density of sites along the coast here. Canmore.org shows that from Ness in the North to Great Bernera in the South, in the land corridor bordered by the shoreline and approximately 0.25 to 0.5 miles wide, there are 862 known historic and archaeological sites and 43 scheduled monuments. The trade and connectivity of the Neolithic cultures through to the Iron Age cultures in this area were contingent upon their maritime nature. The land/ocean setting of these sites is part of their identity and connectedness to their environment. The setting of Calanais would be turned into an industrial horizon. Sections of the community whose spiritual life incorporate the significance of these landscape and seascape relationships to archaeological sites in the locale will be affected by this development. This has not been addressed in the EIAR. Consenting this project would be counter to 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.'

c. NatureScot have stated "We advise that any scale of turbine will introduce widespread significant day and night-time effects on sensitive coastal, landscape and visual receptors." and have also requested that there is "opportunity to engage in design-led approach with council, SNH, MS and community" and "due consideration be given to turbine heights below the 200m height to mitigate significant effects." Northland Power have not shown they have considered turbine heights of this size and their reasoning for rejecting them.

3. Socio-economic Impacts

In the Sustainability Appraisal of the SMP-OW 2020, page 103, it is stated that "there may be some local unease over changes to landscapes and seascapes, and

perceived impacts on recreational opportunities that may have some distributional effects on specific groups within local communities.”

This is a hugely important statement and is an indicator of the magnitude of the mistake that Scottish

Ministers would be making should SNM be granted consent. Many of the inhabitants of this area have family lines that go back here for over a thousand years. The communities here comprise one of the last bastions of original Gaelic community-based culture in the world. They have the highest population density of native Gaelic speakers anywhere in Scotland. That there is a vague and inadequately researched acknowledgment that there may be “distributional” effects on specific groups” within these communities is revealing of an error of policy and implementation of large magnitude. Neither AMrine Scotland or the developer has undertaken a proper assessment of how the development may affect young Gaelic speaking families. I raise the question of now many such families may be discouraged to live in their ancestral home due to the development of SNM thereby weakening the local Gaelic culture immeasurably. Risking such an outcome is counter to policy declarations of Scottish Government as regards Gaelic culture. For example Scottish Government has a stated intention within the National Islands Plan to “Ensure that policies aim to retain and attract Gaelic speakers to live and work in Gaelic-speaking island communities.”

I emphasise here the inordinate impacts that the project plan has had and want to highlight that our communities are not absorbing these negative impacts in a docile way. Rather some people have already chosen to move away from the area due to the stress of the project plans and the prospect of its development. As well as this 88% of residents responding to an online survey have said they do not support the project. A community group has had to fulfil what the developer and Scottish Government has failed to do which is to meaningfully publish the community response to the N4 Scotwind Plan Option and SNM project plans, please see point 1.e.IV above.

In light of the above I respectfully request that the application be refused.

4. Ornithological Impacts

The EIAR fails to adequately address the collision and displacement risks for the following species which migrate through the array area of N4: Red Necked Phalarope (Red listed), Whooper Swan (Amber listed), Redwing (Amber listed), Teal (Amber listed) and Mallard Duck (Amber listed), Ringed Plover (Red list).

They all have a collision risk.

Redwing: Often descend to lower altitudes (below 100 metres) when approaching land or during poor weather.

Teal and Mallard Duck: They typically cruise at 60–150 metres.

Ringed Plover: They typically fly between 30 and 150 metres (100–500 ft) over land and sea.

Red-necked Phalarope: During migration, they often fly relatively low over water, typically 30–100 metres.

I demand that this application is refused consent unless such risk assessments are undertaken and consulted upon.

5. Noise Impacts

There is potential for infrasound produced from the operation of the turbine array to have an impact on land based populations. While the EIAR states that, according to a 2022 Government document, there is no evidence that such effects exist I would like to state the following:

It is known that large wind turbines create infrasound waves.

It is known that infrasound waves have been shown to have effects on human physiology both in vitro and in vivo (Research published in Scientific Reports and Noise & Health (2021–2023) and a 2022 review in Environmental Research)

No modelling has been published of the potential infrasound wave propagation and reinforcement for this turbine array or one of this magnitude.

No field measurement have been conducted for the infrasound wave propagation and reinforcement for a turbine array of this scale and location type.

Addressing the most recent published research on infrasound pollution, as it pertains to this project proposal, has been requested in scoping by the Barvas Estate Trust and the South Bragar Common Grazings Committee yet Despite that, the Applicant has expressly excluded from detailed assessment:

low frequency noise,
infrasound,
and amplitude modulation.

The EIAR relies upon data available up to 2022.

How this is relevant to this objection.

The developer has failed to model infrasound propagation and reinforcement for this specific array. Under ILGRA Stage 3, this constitutes a situation where 'scientific uncertainty... is such that risk cannot be assessed with sufficient confidence to inform decision-making'. The absence of a model is not proof of safety; it is proof of unassessed risk. Interdepartmental Liaison Group on Risk Assessment (ILGRA).

NPF4 Policy 1 and Policy 5 require the application of the precautionary principle. Where there is 'reasonable grounds for concern' about health impacts (Stage 1 of ILGRA) and the risk is 'unassessed' (Stage 3), the planning authority must not grant consent until the uncertainty is resolved. To approve this application without an infrasound model would be a direct violation of NPF4 Policy 5's requirement to 'avoid, mitigate, or manage' risks to health.

"The Environmental Impact Assessment (EIAR) is incomplete. A valid EIA must assess all significant effects. By omitting the infrasound assessment, the developer has failed to provide the evidence base required for the Scottish Ministers to make a rational decision. Under the precautionary principle, the burden of proof lies with the developer to demonstrate safety, not with the community to prove harm.

The "Devastating Impact" Threshold (ILGRA Stage 2)

"The potential harm involves chronic health effects (sleep disturbance, vestibular issues) for a whole community. ILGRA Stage 2 notes that the principle applies to harms with 'potential for devastating impact' on a 'broad base of individuals'. The scale of Spiorad na Mara (900MW, 6-13km from shore) creates a risk of widespread, long term harm to the local population, satisfying the severity threshold.

I therefore demand that consent be refused or conditioned to require a full, site-specific infrasound propagation and reinforcement model before any construction begins.

Yours sincerely, [REDACTED]

*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

From: [REDACTED]
To: [MD Marine Renewables](#)
Date: 07 May 2026 18:26:49

Dear Sir/Madam,

As a close relative of family members living on the Isle of Lewis, I must strongly and 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:

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,

A black rectangular redaction box covering the signature area.

Member of the public 2279

From: [REDACTED]
To: [MD Marine Renewables](#)
Date: 07 May 2026 15:10:29

please stop the wind farms ,its on my doorstep ,perhaps not yours i have misaphonia and cant tolerate the noise and disruption ,you are ruining lives for what greed !! disgusting.

yours

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: New Letter Submission - MD- 00011742 | MD- 00011743
Date: 07 May 2026 16:40:20



Date: 7th 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 letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The application is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline and a strong cultural identity, as well as its near-pristine environment. A thorough review of the Environmental Impact Assessment Report and supporting documents reveals significant planning, environmental, cultural, and procedural deficiencies that cannot be overlooked.

The proposed development raises serious concerns regarding its compatibility with statutory requirements, national policy, and the principles of sustainable development. The application lacks an adequate evidential basis for lawful determination. Critical environmental data is absent, with baseline information being limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, which obscures the potential significant effects of the development. The reliance on a flexible design framework, alongside mitigation measures that have yet to be specified, prevents an accurate assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, leaving unsupported claims regarding negligible or non-significant effects.

There are also clear and serious conflicts with established policy. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime,

and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal presents major challenges, with large turbines situated close to the shoreline. This proximity raises significant concerns related to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and incapable of supporting a lawful determination. In this context, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial, as it fails to furnish a comprehensive, transparent, and dependable account of the potential environmental impacts associated with the proposal. The reliance on a flexible Project Design Envelope, which does not commit to definitive turbine dimensions, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. This lack of specificity compromises the integrity of the assessment and precludes both the public and the competent authority from grasping the actual extent of the environmental effects that may arise.

Furthermore, the application is heavily predicated on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consequently, consent is being requested with the expectation that any environmental harm will be addressed subsequently, which undermines the ability to conduct a meaningful evaluation of effectiveness or to assess residual impacts. This postponement of vital information to post-consent phases is procedurally untenable and contravenes the objectives of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation must be unequivocally established prior to determination.

Evidential deficiencies also abound, encompassing gaps in baseline data, limitations in methodology, and the use of assumptions rather than site-specific evidence. Such issues lead to uncertainty surrounding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information hinders a clear comprehension of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory obligations.

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

In conclusion, the interdependence on an undefined design envelope, the absence of specified mitigation strategies, and the shortcomings in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental impacts, placing

the competent authority in a position where it cannot make an informed determination based on the information submitted.

ORNITHOLOGY AND SEABIRD IMPACTS

The application is situated within key foraging areas and migratory pathways crucial for internationally important seabird populations along the west coast of the Isle of Lewis, many of which are in decline. However, the ornithological assessment fails to provide sufficient evidence demonstrating that these species will not be adversely affected. The evaluation does not adequately address the implications of displacement, collision risk, or habitat loss, which raises significant concerns.

There exists a fundamental contradiction within the application. The developer concludes that there are no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented.

Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly recognised, and the reliance on modelling approaches generates uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor presents an additional, considerable risk, creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term implications of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

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

Moreover, the deficiencies highlighted constitute a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These deficiencies obstruct a thorough evaluation of impacts and support the conclusion that the application does not meet the statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community intertwine. However, the assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage merely as

isolated and static assets. This approach neglects the ongoing social, cultural, and spiritual roles that these elements play within the community.

A significant shortcoming is the treatment of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight fails to acknowledge their continued use and meaning, and disregards how development impacts their settings, leading to an incomplete evaluation of cultural effects.

Furthermore, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and its coastal environment. These elements are vital to the area's identity but have not been considered, resulting in a significant omission that impairs understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity akin to that of an Indigenous People. Yet, there has been no process of Free, Prior and Informed Consent, which diminishes the legitimacy of the assessment. This lack of meaningful engagement does not align with recognised principles for participation in decisions affecting cultural and environmental interests.

Moreover, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone hinders lawful determination.

From a policy standpoint, these shortcomings conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly examined, leaving the application insufficient for a proper evaluation of the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The overall assessment of health, social impacts, and wellbeing presents significant deficiencies that undermine the transparency essential for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included engagement with local residents through focus groups. However, the full report remains unpublished, creating an evidential gap that hinders both public understanding and the competent authority's ability to assess the identified social risks based on the developer's research.

Summaries that are currently available indicate that residents are experiencing notable stress, anxiety, and concern linked to the proposal's scale and proximity. These impacts arise from direct community engagement and should not be considered speculative. The absence of the complete assessment curtails scrutiny of the findings, restricting the ability to ascertain their importance within the decision-making framework.

Moreover, there is evidence suggesting that the proposal poses a threat to community identity and cohesion, with references to "cultural loss" in the developer's own findings. Despite this, these impacts have not been adequately incorporated into the main application or given due consideration. The lack of access to the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process, as a thorough understanding of the social, economic, and health impacts is critical for developments of this magnitude, particularly when they may affect community character and functionality. Without providing the complete dataset, the application fails to establish a comprehensive evidential basis for weighing the benefits against the harms.

From the perspective of policy compliance, the application does not sufficiently demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and avoid causing harm, yet the available evidence indicates that existing adverse effects have not been fully addressed. In light of the absence of the complete assessment, the application cannot claim compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to carry out a thorough socio-economic and health evaluation without the full Social Impact Assessment, marking a significant omission within the application and a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, in conjunction with the evidence of existing adverse effects, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the view that the application lacks sufficient information to be supported.

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 risks to the sensitive West Lewis coastline, which is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. The assessment of construction and pollution risks is notably incomplete, lacking the necessary detail to evaluate potential environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead depending on mitigation and contingency measures that are to be prepared after consent has been granted. This reliance on undefined future measures raises considerable concerns, especially given the delicate nature of the receiving environment.

The application acknowledges various risks, including sediment mobilisation and the potential for accidental chemical or oil spills. However, it fails to provide adequate information on the strategies that will be implemented to prevent, control, or monitor these risks. Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of such disturbances, which could adversely affect marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures only exacerbates these issues. By postponing contingency planning to a post-consent phase, the proposal undermines the ability to assess whether appropriate safeguards are in place for responding to pollution events. This creates procedural risks and hinders the competent authority's capacity to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation need to be thoroughly assessed prior to consent; when such information is absent, a lawful determination cannot be reached. Additionally, the application does not demonstrate compliance with the policy requirements regarding environmental protection and water quality.

In summary, the combination of undefined mitigation measures, a lack of detailed management plans, and uncertainty about potential impacts results in an assessment that is materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the current application presents an inadequate assessment of fisheries and marine life, failing to robustly evaluate ecological or socio-economic impacts. There is a significant concern regarding the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds are available or can absorb additional pressure, raising the risk of overfishing in other areas, which could have far-reaching economic consequences for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain poorly understood.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. High-energy hammer piling over an extended duration is likely to disturb marine life across vast distances, notably affecting species like dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application diminishes the significance of these effects without adequate supporting evidence.

Moreover, there is an evident inconsistency in the application, as it acknowledges the need for licenses to permit harm to European Protected Species while concurrently describing these impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious compliance concerns with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorization.

Additionally, the assessment overlooks cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without an exhaustive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic environment.

From a policy standpoint, the application fails to comply with National Planning Framework 4 and the National Marine Plan. It does not demonstrate that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal represents sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is markedly deficient in its evaluation of nocturnal wildlife and dark skies, which constitutes a significant omission. The coastline of West Lewis is noted for its exceptionally dark skies, integral to both environmental quality and cultural identity, as well as being a draw for tourism. The proposal intends to install permanent red aviation lighting that would be observable over considerable distances, thereby creating a persistent and intrusive "wall of light" across the western horizon, fundamentally altering the nocturnal environment.

There is no assessment of how this lighting would impact visual amenity, landscape character, or the experiences of local residents and visitors. Such an oversight is particularly significant in light of the role that dark skies play in the area's identity and the burgeoning sector of astro-tourism. This lack of consideration introduces a clear deficiency in the comprehensive landscape and environmental evaluation.

More importantly, the proposal fails to include an evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially susceptible to artificial lighting due to their phototactic responses, which can cause disorientation and raise the risk of collisions. There is no lighting impact assessment or phototaxis study included in the application, resulting in an inadequate evaluation of how aviation lighting may affect these species or contribute to increased mortality.

This oversight is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately address nocturnal activity or related risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting, yet this potential hazard has not been examined. The absence of data specific to night-time conditions creates a crucial gap in the understanding of ecological impacts.

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

From a policy standpoint, these omissions contradict the guidelines set forth in the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. Moreover, they undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the overall ecological framework.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife represents a substantial evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analyses render the application incomplete and inadequate for a lawful decision-making process.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the main issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, despite being assessed under a more

robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal remains flawed.

The evidential basis for the application is neither complete nor reliable. Key baseline data is missing, the design envelope is not clearly defined, and unspecified mitigation measures are relied upon. Additionally, essential impact pathways have been overlooked, including those related to nocturnal wildlife, onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is insufficient and fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, the application presents serious shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the incomplete Social Impact Assessment is a significant omission. These gaps hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is in direct conflict. It does not adequately protect biodiversity, natural places, or cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leaving the impacts on peatlands, carbon balance, habitats, and crofting land unclear.

Uncertainty surrounds potential environmental risks, which could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extent of information gaps, coupled with policy contradictions and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should either refuse consent based on these grounds or use appropriate regulatory measures to require the submission of the missing information.

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

Additional Comments

Just don't ruin our island

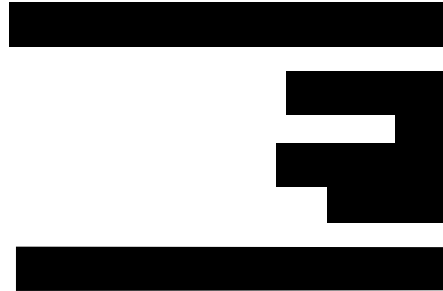
Yours faithfully,



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

details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter
Reference: 17D2500E

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: New Letter Submission - MD- 00011742 | MD- 00011743
Date: 07 May 2026 16:11:35



Date: 7th 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 serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The unprecedented scale, proximity to the shoreline, and design of this proposal raise significant concerns about its adherence to statutory requirements, national policy, and the principles of sustainable development.

A review of the Environmental Impact Assessment Report and associated documentation reveals critical deficiencies. The application lacks an adequate evidential basis for a lawful determination, with missing critical environmental data and limited, inconsistent baseline information. Key aspects of the proposal remain undefined, and the use of a flexible design framework obstructs a clear understanding of likely significant effects. Furthermore, the reliance on unspecified mitigation measures raises questions about their effectiveness, leaving the documentation unable to provide a comprehensive understanding of the environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not substantiated by robust evidence.

The application is fraught with substantive policy conflicts. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural

heritage, and health and wellbeing. The proposal fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests required for consent and compromise the ability of the competent authority to deem the development acceptable in policy terms.

Moreover, the absence of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy further illustrate that the application is incomplete and cannot support a lawful determination. In light of these factors, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and does not give a complete or clear account of the likely environmental effects of the proposed development. The use of a flexible Project Design Envelope, which lacks specific details on turbine dimensions, layouts, or configurations, creates substantial uncertainty. This situation undermines the assessment's credibility and leads to a failure in accurately presenting the impacts, preventing both the public and the competent authority from grasping the true environmental consequences.

The application places heavy reliance on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be managed later hinders any substantial evaluation of effectiveness or understanding of residual impacts. This approach of deferring critical information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which demands that significant effects and mitigation are clearly identified prior to determination.

Significant evidential gaps are present, such as missing baseline data, limitations in methodology, and the use of assumptions instead of site-specific evidence. These issues lead to uncertainty regarding the extent and significance of impacts, especially where conclusions regarding negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainty that conflicts with statutory requirements.

Consequently, the application does not meet the evidential standard required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to comply with National Planning Framework 4, including obligations relating to biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that suitable safeguards are established.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal

environment is fundamentally flawed, leading to a lack of reliable understanding of ecological receptors. This area is characterised by a highly sensitive and biologically active marine system, yet the baseline data provided is incomplete. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of various species, resulting in an unreliable evidential basis for evaluating potential impacts.

A significant oversight in the assessment is the failure to properly recognise and evaluate the presence of otters, a European Protected Species. The application does not account for their active use of coastal areas for foraging and movement, neglecting to consider their core foraging range and behavioural patterns. Consequently, the potential impacts of construction disturbance, noise, and increased activity on this species have not been sufficiently assessed, undermining any conclusions regarding the absence of significant effects.

The assessment of basking sharks also exhibits serious deficiencies, primarily due to a reliance on aerial surveys, which introduces substantial detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that show frequent use of these waters. The failure to incorporate or properly consider such data leads to an incomplete baseline and compromises the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the true scale of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to comply with the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not adequately identify or assess protected species. The level of uncertainty generated prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment contains significant gaps in evidence and internal inconsistencies, which undermine its conclusions. The application fails to meet the evidential threshold required to demonstrate that internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. This area supports many seabird species that are already in decline. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate displacement, collision risk, or habitat loss.

There is a fundamental contradiction in the application. The developer concludes that there are no significant adverse effects, while also advancing a Habitats Regulations derogation case, which is required only when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions presented lack support from the evidence. The assessment fails to provide sufficient proof

that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly considered, and the reliance on modelling techniques introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor poses an additional risk by potentially creating a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The application does not adequately assess the long-term implications of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

From a regulatory viewpoint, the presence of contradictory conclusions, data gaps, and limitations in modelling means that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, preventing a lawful conclusion that supports consent. Furthermore, the identified deficiencies demonstrate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

Overall, the assessment is unreliable due to these internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline, characterised by its expansive Atlantic horizon and an undeveloped nature, contributes to a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a continuous industrial presence that fundamentally alters this unique character, leading to an irreversible transformation of the landscape. The application fails to adequately convey the magnitude of this visual change. The turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, impacting visual amenity and diminishing the inherent qualities of naturalness and remoteness.

Concerns arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence suggests these viewpoints may not effectively represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which in turn undermines the assessment's reliability.

Moreover, the application does not consider the interconnectedness of landscape, seascape, and cultural heritage adequately. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated entities fails to recognise their interdependence, resulting in an incomplete assessment of impacts on their setting and cultural significance. The introduction of industrial elements to the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not merely a visual impact but also broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural environments and historic assets. The extent of change proposed does not align with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

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

In summary, the assessment inadequately represents the extent of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment related to construction and pollution risks is notably inadequate, failing to deliver the necessary detail to evaluate the likely environmental effects. The project entails considerable seabed preparation and installation operations in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are intended to be developed after consent, thereby hindering any meaningful assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures raises significant concerns, particularly due to 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 recognises risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, managed, or monitored.

There exists uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it remains impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the ability to evaluate whether suitable safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures effectively at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated before consent is granted, and the absence of such information renders a lawful determination impossible. Additionally, the application does not prove compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the absence of detailed

management plans, and uncertainty regarding potential impacts culminates in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries associated with the proposed development is fundamentally flawed and fails to adequately assess both ecological and socio-economic repercussions. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry, yet the application does not sufficiently demonstrate how these vital habitats and activities will be safeguarded from significant disruptions.

One of the major concerns is the presumption that displacing fishing activity can occur without repercussions. The application lacks any substantiation regarding the availability or accessibility of alternative fishing grounds that could absorb the additional pressure. This lack of evidence is critical, as displacement could lead to overfishing in other areas, with potential adverse economic impacts for the local fishing fleet. The absence of a detailed and evidence-based assessment means that the consequences for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable threats to marine species, especially due to the underwater noise generated during the construction phase. The use of high-energy hammer piling for extended periods is anticipated to create disturbances that could affect marine life over large distances, notably the local bottlenose dolphin population. The application downplays these predicted disturbances, raising concerns that are not sufficiently backed by evidence.

There is also a troubling inconsistency within the application; it acknowledges the necessity of licences for any harm to European Protected Species while simultaneously characterising those impacts as negligible. This contradiction calls into question the integrity of the assessment and raises serious compliance issues regarding the Habitats Regulations, especially when harm is anticipated to a level that would require legal authorisation.

Furthermore, the assessment does not adequately account for cumulative impacts stemming from multiple stressors, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to ascertain the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which ultimately prevents a determination that the proposal is sustainable.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment of dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant gap in the application. The West Lewis

coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism, particularly with the rise of astro-tourism. The proposal introduces permanent red aviation lighting that is visible over long distances, creating an intrusive "wall of light" effect across the western horizon, thereby fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly concerning given the critical role dark skies play in the area's identity. The lack of consideration for these impacts results in a significant deficiency in the overall assessment of landscape and environmental factors.

More alarmingly, there has been no evaluation of how these lighting changes might affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. The application does not include any assessment of lighting impacts or a study on phototaxis, thus failing to consider the potential adverse effects of aviation lighting on these species and the increased risk of mortality they face.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activities or associated risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts.

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

From a policy perspective, the omission contradicts the National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines a broader understanding of landscape and seascape impacts, as the character of night-time environments is integral to the overall context.

In conclusion, the lack of any assessment regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development in accordance with statutory duties, national policy, and evidential standards. It mirrors the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This current proposal, however, is presented against a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for determination, including critical gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and the omission of essential impact pathways such as nocturnal wildlife, the

complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident, particularly the lack of a compliant Island Communities Impact Assessment, which breaches statutory requirements set forth in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment represents a material omission. These gaps hinder the competent authority's ability to evaluate the effects on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unfit for determination.

Moreover, the proposal conflicts with National Planning Framework 4, as it does not protect biodiversity, natural places, or cultural heritage. It also fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been adequately evaluated, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

Wrong

Yours faithfully,

[Redacted Signature]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 16192D05

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 07 May 2026 16:02:44

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).

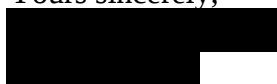
No alternative solutions: Under the Habitats Regulations, consent cannot be granted if alternative solutions exist. Other ScotWind sites are available in waters without the same density of European Protected Species and designated habitats, and the existence of those alternatives is directly relevant 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 dear family lives on the Isle of Lewis, and this would no doubt make them have to move. They love where they currently are, and had planned to stay there indefinitely.

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,

A black rectangular redaction box covering the signature of the sender.

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 10 May 2026 15:19:19

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.

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

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components of a development together during consenting processes.'

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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.

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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:

To scar the seascape with scientifically proven negative impacts on ecosystems and human health is despicable. That's before considering the lack of need, the cumulative impact of the scale of "renewable" infrastructure blighting the UK.

Then the negative impact all of this will have on tourism and loss of income.

Policy is wrong. Science is being ignored and the only beneficiaries are the private companies and their shareholders.

Time for those walking blindly down this road to wake up

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]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 07 May 2026 16:22:38

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.'

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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.' Para. 4.23 'Designated assets should be protected in situ within an appropriate setting'.

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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.

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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.

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My further objection points:

I object to the proposals in hand on many counts.

I have concerns about the wildlife, effects on the seabed, industrialisation of a remote and beautiful landscape and the damage that will be done on tourism on which we rely.

There does not seem to be any advantages to the islanders and negotiations do not appear to have been inclusive.

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]

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 07 May 2026 19:16:36

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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:

Net Zero initiatives are destroying younger generation's ability to survive. Skyrocketing prices with N4 only adding to the problems!

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]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 07 May 2026 19:24:52

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.

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My further objection points:

This would destroy our unique and beautiful island with little to no benefit to islanders, why would we want this?

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,

A black rectangular redaction box covering the signature of the sender.

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743) (MD-00011742 & MD-00011743)
Date: 07 May 2026 20:39:38

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.'

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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.

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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.

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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.

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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:

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,



From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743) (MD-00011742 & MD-00011743)
Date: 08 May 2026 00:04:14

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.'

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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:

88% object. That number alone should immediately stop you in your tracks.

What are your core values? Do they include respect for nature, community, the circle of life, and those deceased buried beneath the land?

Sit with that.

Who benefits from this? Truly?

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.

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 08 May 2026 03:09:51

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.'

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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."

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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.

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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).

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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:

I object to the proposed turbines as they will be very unsightly.

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]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 08 May 2026 18:16:58

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.

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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.

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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:

To scar the seascape with scientifically proven negative impacts on ecosystems and human health is despicable. That's before considering the lack of need, the cumulative impact of the scale of "renewable" infrastructure blighting the UK.

Then the negative impact all of this will have on tourism and loss of income.

Policy is wrong. Science is being ignored and the only beneficiaries are the private companies and their shareholders.

Time for those walking blindly down this road to wake up

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]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 07 May 2026 14:47:16

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).

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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:

This is what poor light and at night will look like if N4 (Spoid Na Mara) goes ahead and even visible from Stornoway!!!

I wish to object to this proposal as I have lived experience living beside a wind turbine and the noise pollution, constant whooshing 24/7 is unbearable and affects your health and that was one, 50m tall, one mile away on the other side of the hill from our home. I have listed out other reasons why this planning applications should be rejected:

- N4 conflicts with the Development Plan and NPF4
- N4 harms protected seabirds
- N4 harms vulnerable and protected marine life...this area, is recognised as one of the most important in the

UK

- N4 harms humans living in close proximity, I can speak from lived experience on this
- N4 conflicts with the landscape and character of the West Side of Lewis
- N4 harms visual amenity by introducing an industrial scale that clashes with the horizon. I don't think local communities will appreciate the impact until it is lost.
- N4 conflicts with and threatens tourism, all the attractions including the Callanais Stones, Dalmore and Dalbeg beaches will be affected
- N4 harms dark skies
- N4 conflicts with transport capacity
- N4 harms heritage and other historic sites and cultural aspects of the island
- N4 causes cumulative harm that is long-term and difficult to reverse
- N4 conflicts with biodiversity policy including permanent damage to the protected peatlands
- N4 threatens community identity, tradition, and the distinct character of the West Side

This is simply the wrong proposal, in the wrong place and is not welcome.

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,

A black rectangular redaction box covering the signature of the sender.

Member of the public 2291

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to N4 development
Date: 07 May 2026 21:44:20

N4 conflicts with the Development Plan and NPF4

N4 harms protected seabirds

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N4 conflicts with transport capacity

N4 harms heritage and other historic sites

N4 causes cumulative harm that is long-term and difficult to reverse

N4 conflicts with biodiversity policy

N4 threatens community identity, tradition, and the distinct character of the West Side

N4 is based on corrupt climate science

Regards

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to N4 windfarm
Date: 07 May 2026 21:00:00

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.'

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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.

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My further objection points:

It will do continues harm to the island in so many ways, ruin coastlines, bring unwanted workies to the island and literally only benefit people not on the island

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,

A black rectangular redaction box covering the signature of the author.

Member of the public 2293

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to Spiorad na Mara N4 Offshore Wind Farm
Date: 07 May 2026 20:36:59

I object to the N4 Spiorad Na Mara Ltd Offshore Wind Farm Isle of Lewis, MD-00011742 & MD-00011743.

I object to the scale of the project, the environmental impacts and lack of community engagement.

Thank you

[REDACTED]
[REDACTED]
[REDACTED]

Member of the public 2294

From: 
To: [MD Marine Renewables](#)
Subject: Objection to Spiorad na Mara Offshore Wind Farm - Isle of Lewis
Date: 07 May 2026 20:33:00

To the Spiorad na Mara Consultation Team,

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

I am writing as a resident of the Isle of Lewis to register my strong objection to the proposed Spiorad na Mara offshore wind farm and planning application. I appreciate that consultation has been offered, but I want to be clear: my concerns are deep, and they go to the heart of what makes this place worth living in.

VISUAL IMPACT AND LANDSCAPE HARM

The Atlantic coastline of Lewis is one of the most dramatic and unspoiled landscapes in Europe. The proposed turbines — up to 65 structures reaching heights of around 340 metres — would be visible from beaches, headlands, and communities across the west coast. These are not abstract planning statistics. They are places I know, places my family knows, and places that generations before us have cherished. To industrialise this horizon on such a scale would cause irreversible harm to a landscape that cannot be replaced. No amount of economic benefit justifies permanent and irreversible damage to what is, quite simply, one of the most beautiful places on earth.

IMPACT ON THE LOCAL COMMUNITY AND WAY OF LIFE

This project is owned and led by a Toronto-based corporation with an Irish energy company as co-developer. The Isle of Lewis is not a blank canvas for outside investors to exploit. Our communities — many Gaelic-speaking, shaped by crofting and fishing traditions that go back centuries — have a right to determine what happens to the seas and coastlines we depend on. I am deeply concerned that the benefits of this development will flow outward while the costs — visual, environmental, and cultural — are borne entirely by those of us who live here. The scale and irreversibility of this project demands that local people have far more than a consultation; we deserve a genuine say in whether this proceeds at all.

ENVIRONMENTAL AND WILDLIFE CONCERNS

The waters off the west coast of Lewis are home to internationally important populations of seabirds, cetaceans, and other marine wildlife. I am alarmed that the full environmental consequences of 65 turbines across 61 square miles of ocean — including noise, disruption during construction, and the long-term footprint of foundations and cables — have not been adequately assessed or communicated to local communities. The peatlands of Lewis, through which onshore cables would run, are also among the most carbon-rich habitats in the UK. Their disturbance risks releasing stored carbon on a scale that would undermine the very climate case being made for this development.

I do not object to renewable energy. I understand the urgent need to decarbonise. But the right development must be in the right place, with genuine community consent, and the scale of Spiorad na Mara — imposed on a fragile island environment by an overseas developer — does not meet that test.

I urge the project team, and those responsible for granting consent, to listen seriously to the people who live here. We are not against progress. We are against the permanent transformation of our home without our consent.

Please register this as a formal objection.

Yours sincerely,









Member of the public 2295

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to Spiorad na Mara offshore wind farm Isle of Lewis
Date: 07 May 2026 16:11:27

I wish to object most strongly to the proposed Spiorad na Mara wind farm of the Isle of Lewis due to unassessed onshore impacts, irreparable industrial harm to coastal character and island landscape

As an island resident it is also clear that the majority of islanders are against the proposed development

Yours [REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to application: MD-00011742 & MD-00011743
Date: 07 May 2026 16:13:01

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

DATE: 7 May

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.'

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 7a '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 i *'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.'*

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 contact information]

***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*

X *I have put an X here because I want my personal details to be kept confidential.*

Member of the public 2297

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to the Planning Application for Spiorad na Mara Offshore Wind Farm (Offshore Works)
Date: 07 May 2026 18:15:31

[REDACTED]
[REDACTED]
[REDACTED]

Date: 7 May 2026

To: Scottish Ministers (Marine Scotland – Marine Directorate) MD.MarineRenewables@gov.scot

Dear Sir / Madam,

I am writing to formally object to the planning application for the Spiorad na Mara Offshore Wind Farm.

I believe that the (EIA) fails to fully assess likely significant effects of the proposed development on the marine life, coastal communities, infrastructure and various industries which rely on the natural environment.

I also believe that the scale and proximity of the wind farm to the coast line has the biggest impact on the local communities, and this has not been satisfactorily addressed in the current proposals.

We believe the EIA has not considered:

- The migration of salmon to all the water inlets on the west coast of Lewis, and the impact the construction of the wind farm will have on sea currents and wildlife
- The impact of the windmills on migrating and resident birdlife
- The use of the sea on the west coast for water sports, particularly surfing.
- The visual mass, movement and noise from the wind farms on the local residents and visitors to the area.
- The impact of construction and operation of the wind farm on local visitors and the industries that rely on local visitors.
- The impact of the low winter sun and sunsets being viewed through rotor blades will lead to flickering and visual disturbance which can be harmful to many people - those driving cars, people with mental health issues or visual impairments, those with epilepsy, etc.
- The potential for detrimental mental health impact to those currently enjoying the beauty and tranquility of the coastline.

Other large wind farms, such as those off Berwick upon Tweed, Brighton - sit considerably further away from the coastline. Spiorad na Mara is proposed to be as close as 5 km from the shoreline. Berwick upon Tweed wind farm is 38km from the coastline and Brighton 13-20km. The proximity and scale of the proposed Lewis wind farm has an to local residents and a much-visited beautiful coastline is not acceptable to local residents and should be reconsidered.

Scottish Planning Policy recognises the importance of protecting and enhancing local landscape character, including its contribution to the health and wellbeing of communities.

It is therefore requested that the Planning Authority fully consider the cumulative effects on landscape, seascape, and community wellbeing prior to the granting of consent, as these represent material considerations in the decision-making process.

While we recognise renewable energy sources needs to be constructed, this should not be at the cost of the natural environment, the local communities and the local industries.

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection
Date: 08 May 2026 06:54:30

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]
[REDACTED]

Postcode: [REDACTED]

Email: [REDACTED]
[REDACTED]

8.05.26

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 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.'
My further objection points:
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:(type your name here) [REDACTED]

X *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
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: Ojection to the N4 Spiorad na Mara application
Date: 08 May 2026 15:03:51

Dear Madame/Sir:

My name is [REDACTED]. I live [REDACTED]
[REDACTED]

I am writing to object to the proposed offshore windfarm off the Isle of Lewis in Scotland and hope that you deny the application and project.

I do not live in Scotland, but it is my ancestral land and I am urging you to preserve this beautiful and ecologically unique place due to the amount of adverse environmental and economic impacts during construction and operation of the project, including cumulative and secondary adverse impacts to:

- Environmental impacts to critical marine mammal habitat (a Scottish Government scientific report on the west coast of Lewis states that "the Outer Hebrides are probably the richest area of the UK for marine mammals.")
- Environmental impacts to breeding and foraging habitat for avifauna.
- Darksky sanctuary
- Economic impacts on fisheries resources
- Economic impacts on tourism
- Preservation of indigenous culture and way of life
- Environmental impacts to historic and cultural resources, including burial sites
- Disproportionate economic burden on the people of Scotland and the Isle of Lewis
- These structures have a lifespan of only approximately 25 years. Considering the environmental, cultural, and economic impacts of this project, it is not worth the destruction of habitat and impacts to important darksky sanctuary and ancient cultural and natural resources.

While I agree that renewable energy is needed, this is not the location given the numerous irreversible impacts.

Thank you,
[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Planning App. MD-00011742 & MD-00011743 - SPIORAD na MARA LTD- SPIORAD na MARA OFFSHORE WIND FARM- ISLE OF LEWIS
Date: 07 May 2026 17:04:10

Dear Sirs

I wish to formally add my objections to the above planning applications for the following reasons:

1. Lack of Community Engagement by the Crown Estates before leasing the area to both a Canadian firm and an Irish firm. The Crown Estates ignored completely parts of the Scotland National Marine Plan (NMP) General 18 which specifically states that all parties with a specific interest should be given the opportunity to engage with the processes involved. NMP para. 4.77 refers. Also NPF4 spatial Principals- Just Transition. Are the people who live on Lewis not considered worthy or intelligent enough to be considered when powers that be decide on their homeland?
2. Lack of understanding of Cultural Significance. NMP Para4.20 and NFP4 policy 7. If a development of this size was considered around Stonehenge in Wiltshire, it would be "thrown out" but it would appear the very significant Callanish Stones and Broch (amongst other historic monuments) are not considered as equal monuments worthy of a special setting.
3. Significant Impacts on Protected Birds and Habitats. See Conservation (Natural Habitats etc) Regulations 1994 and 2018. Offshore Regulations, Marine Scotland Act 2010 and Wildlife and Countryside Act 1981.
4. Danger and Disturbance to Marine Life. We have a rich and diverse quantity of sealife and migrating mammals such as whales and dolphins within this area. Who "speaks" for them when they are pushed out?

There are so many other reasons for which these applications should be rejected, many already listed by other objectors. In my mind, this proposal is nothing more than another 'Highland Clearance' to make way for Government and Businesses (not landlords and sheep this time) to make vast sums of money at the expense of a few unimportant crofters, fishermen and island residents whose lives will be altered for years to come. We choose to live here at the edge of Europe because we cherish our environment but this makes us easy prey for the companies and government exploiting this very environment. If Canadian firms wish to exploit Canada, then that's for their government to deal with. If Irish firms wish to exploit Irish waters, then let them fight it out with their government. We already pay the highest electricity bills in Europe, this development will not change that. All it will do is blight the lives of islanders for ever! (Of course, it would suit the government and conglomerates to have us all moved out to the Central Belt so the whole island of Lewis and Harris could become a giant wind farm!) When the gales blow here, which they frequently do, the turbines will have to be switched off, meaning even more taxpayers money going the way of big business. How predictable and how short sighted!! And still, the net zero fanatics insist it's necessary.

This planning decision is about the long term future and the character of a landscape and community that can never be replaced, once altered on this scale. Perhaps the Planning authority think this is not important enough, a few voices in opposition outweigh the

financial grab by the government? It is very far from this. Please reject this application. My grandparents, great grandparents and those before them would be horrified and deeply saddened by what's being proposed here in their ancient homeland.

Yours faithfully

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Spiorad na Mara Offshore Wind Farm
Date: 07 May 2026 16:34:07

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.'

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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:
Just leave nature alone or there will be no nature left.

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

A black rectangular redaction box covering the signature of the sender.

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: WIND TURBINES OBJECTION
Date: 07 May 2026 14:59:47

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.

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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.

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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:
don't ruin our island scenery

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,



From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: objection to N4 development next to the Isle of Lewis
Date: 07 May 2026 16:52:07

I formally object to the above application for the following reasons-

There is no need for this. It will not benefit local people or the environment. It will affect people's and animals health and lives, and the tourist industry too, as nobody wants to see the sea filled with giant turbines like this. It will affect the feeling and importance of ancient sites in Lewis. Heritage will be totally ignored with this development. There are no benefits to this site.

And also 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 I 'Development proposals affecting a World Heritage Site or its setting

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'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.'

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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.

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My further objection points:

As stated previously, there is no need for this. It will not benefit local people or the environment. It will affect people's and animals health and lives, and the tourist industry too, as nobody wants to see the sea filled with giant turbines like this. It will affect the feeling and importance of ancient sites in Lewis. Heritage will be totally ignored with this development. There are no benefits to this site. There has been no meaningful community engagement, and there is no valid reason for this development.

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]

[REDACTED]