

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to N4
Date: 03 May 2026 16:48:50

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

NPF4 Policy 11 e 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 of the sender.

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to SPIORAD NA MARA
Date: 03 May 2026 15:57:36

I hereby object to the SPIORAD NA MARA Offshore Wind Farm application.

Application reference:

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

My main objections are as follows:

The scale of the project is too big, too close to the shore and the turbines are too tall (up to 338 meters above sea level).

The negative impact on locals and the Isle of Lewis are absurd. They wouldn't dare proposing a project like this in the south of England, but they are probably the ones benefiting from it.

Scotland already produces more electricity than it uses, so won't need another wind farm of this scale.

There are no benefits for the people near the wind farm or the Isle of Lewis in general.

What's been offered are 'community benefits', just a few million pounds while Northland Power, rakes in billions.

We are fobbed off with mirrors and beads.

It would be reasonable to give locals, islanders and island businesses a proper discount on their electricity bill or unit price.

I am not against a wind farm on my doorstep, if the project would be smaller, way less turbines and 50% lower in height, including a discount on my electricity unit price of at least 50%.

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to SPIORAD NA MARA
Date: 03 May 2026 15:19:21

I hereby object to the SPIORAD NA MARA Offshore Wind Farm application.

Application reference:

MD-00011742 + MD-00011743

Spiorad na Mara Limited- SPIORAD na Mara Offshore Wind Farm - Isle of Lewis

My main objections are as follows:

1. The scale of the project: too big, too close to the shore, too tall (up to 338 meters above sea level)

The impact on locals and the Isle of Lewis in general is absurd. They wouldn't dare proposing such a project in the south of England but they are probably the ones benefitting from it.

2. There are no benefits for the people near the Wind Farm or the Isle of Lewis in general.

What's been offered are " community benefits ".... just a few million pounds, it's " peanuts ".

It's not unreasonable to give locals/islanders/businesses a 50% discount on their electricity costs/unit price.

I would be willing to accept a Wind Farm on my doorstep if the project was smaller: around half the height, not so close to the shore and maybe just up to 40 turbines instead of 60 and a 50% discount on my unit price.

Kind regards,

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Section 36 Consent Application — Application references: MD-00011742 & MD-00011743 — Spiorad na Mara
Wind Farm – Isle of Lewis
Date: 03 May 2026 15:23:51
Attachments: [Objection to N4 Application.pdf](#)
[ATT00001.htm](#)
Importance: High

Dear Sirs,

Please find attached by formal objection to the above referenced Marine Applications.

Kindly confirm safe receipt of this email and attachment.

Marine Directorate
Licensing Operations Team
Scottish Gov
375 Victoria Road
Aberdeen
AB11 9DB

3 May 2026

For the attention of the Scottish Ministers.

Ref: Marine Directorate Licensing Operations Team - Section 36 Consent Application — Spiorad na Mara Offshore Wind Farm Application references: MD-00011742 & MD-00011743 – Spiorad na Mara Limited – Spiorad na Mara Wind Farm – Isle of Lewis

Dear Sirs,

As a resident living and bringing up my family on the west coast of Lewis, I have a significant interest in the above referenced application as my home and local community will be destroyed due the unprecedented scale and proximity of the wind farm proposal. We will have to live with the intrusion during the construction, operating and decommissioning phases of what is a large-scale industrial development that would impact our lives for a minimum of four decades.

If this development were to proceed there would need to be significant amendments made to reconsider the location, minimise the impact to an acceptable scale in keeping with the environment and residents' concerns, coupled with a commensurate community compensation package for those communities along the western seaboard of the Isle of Lewis that would be most impacted.

I therefore wish to **formally object** to the referenced application and cite the following reasons:

Lack of Community Engagement

There was no consultation with the communities on the west coast of Lewis prior to the Crown Estate Scotland identifying and leasing of the N4 area for development. The plan was imposed upon residents without consent. Our local council authority (Comhairle nan Eilean Siar) has since admitted and apologised that they had misrepresented these communities by stating to the Scottish Government that there was no objection from local communities to the proximity of N4 location and the communities were in favour. This misrepresentation is a significant breach of our communities' rights under existing planning legislation which alone would justify suspension of any consenting until a public enquiry is undertaken.

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.'*

The above opportunities for early engagement were not afforded to our community.

During the consenting phase the developer has held several statutory meetings with the public, however there has been very minimal adjustments to the original scale of the development to address the concerns voiced from residents' including my personal feedback. As such significant concerns remain.

Visual, Sound and Light Pollution

The N4 lease area is unprecedented in the UK both in terms of proximity (5km to 13km) from shore, where most townships and residential settlements are located, but also combined with the large scale (338m above mean sea level) and number of wind turbine generators, these will be the tallest marine wind turbines in UK waters. The visual landscape will be significantly affected.

The developer has presented a matrix in their documentation to capture the severity of 'impact' and 'effect' for several elements that can impact 'receptors' along the coastline, namely the residents. What is apparent is that this approach conveniently reduces the combined rating from 'Major' to 'Moderate', 'Minor' or 'Negligible'. Despite several 'Major' and 'Moderate' impacts identified in areas of concern these have overall been downgraded by the developer. I question the validity of this approach where the developer's own findings had identified significant concerns yet by their own measures try to downplay the negative impact on us.

The sound pollution during construction over a 5-year period and then operation for 35 years has not been adequately discussed with minimal mention of light flicker effect of blades across all times of the year or light pollution at nighttime. What is evident is that the developer has not fully considered these issues given the unprecedented size, proximity or final selection of turbine heads prior to seeking consent as there is no offset benchmark data readily available for comparison. I respectfully request that all impacts are fully understood and meet reasonable levels acceptable to the most vulnerable, and all, in our community prior to any consent being considered.

Unfavourable Impact on Health and Wellbeing of Residents

Within the developer's own Environmental Impact Assessment Report (EIAR), they have stated that the impact of construction-related or operational visual change may be psychological. Changes to familiar seaward views can reduce visual amenity and the restorative value residents may derive from their surroundings, which in turn may contribute to increased stress, annoyance, and reduced mental wellbeing. In a rural island setting such as the Isle of Lewis, where the coast and open sea views are a defining part of everyday life and are strongly associated with perceived naturalness and remoteness, temporary industrial features (more than 35 years!) may be experienced as a more pronounced intrusion than in more developed settings.

For the most vulnerable members of our community, the impact was initially classified as Major before being subsequently reassessed to Moderate (by the developers own judgment which is questionable). As above all negative impacts on my communities' residents need to be fully considered with an appropriate level of due diligence and appropriate mitigations applied before any consent can be considered.

Lack of understanding of Cultural Significance

The EIAR makes no reference to our 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 communities' relationship with our 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, Migratory Fish 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. There have been no direct studies undertaken on the potential impact to fragile migratory salmon and sea trout stocks that enter fresh waters from the sea into several rivers along the coastline obstructed by N4. Several of these rivers generate income to the community from local and visiting sport anglers.

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, Arnol Blackhouse 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 reason for 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 marine consent whilst the onshore phase of the development has yet to be presented is of concern. 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 development would industrialise the unspoiled coastal scenery and dark skies on the Isle of Lewis, destroying the very qualities that attract many visitors to our community. Residents have consistently warned during consultation that this visual impact would decimate the tourist industry on which so many of our Estate residents and the local community are dependant. 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,’*

Housing Values

During the consultation period, the impact on the market value of houses or desirability for resale was raised by many residents including myself. The marine planning application has not addressed this point. No assurance has been given that there will not be a detrimental effect on housing values or any offer of compensation.

In summary, the Scottish Ministers must consider the long-term future and character of a landscape and community that cannot be replaced once altered by the scale proposed in this application. Spiorad na Mara Offshore Wind Farm will cause significant, cumulative and largely irreversible harm to landscape and seascape character, heritage setting, and the tourism economy which many residents are reliant upon for a livelihood. The identified risk to health and wellbeing of residents along with house values cannot be ignored. **I therefore respectfully request that this application is rejected and the location of N4 is changed to a location that will address the concerns raised above.**

I am not alone in my concerns; there has been overwhelming opposition voiced across my community with 88% against the development in a recent community opinion poll.

Thank you for your consideration.

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to Spiorad na Mara - thank you for your consideration (MD-00011742 & MD-00011743)
Date: 01 May 2026 12:55:04
Attachments: [Objection Letter to Spiorad na Mara.pdf](#)

Dear Marine Directorate,

I hope you are well. I kindly ask you to consider the letter attached to this email as a formal objection to the following application application

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

This application contravenes the following planning policies and guidance:

- Lack of Community Engagement
- Lack of understanding of Cultural Significance
- Significant Adverse Impacts on Protected Birdlife and Habitats
- Failure to Protect the Integrity and Setting of Scheduled Monuments
- Unassessed Onshore Impacts and Breach of Statutory Rights of Crofters
- Irreparable Harm to the Tourism Economy and Coastal Character
- Community Opposition and lack of Community Empowerment

I kindly ask you to consider the three further objections:

- Infrastructure readiness and viability of the energy transition
- Misleading claims of alignment with the local community
- Distributional asymmetry and climate justice

I look forward to hearing back from you,

[REDACTED]

Let's connect on [LinkedIn](#) and get our latest report at [REDACTED]

I work flexibly, so while it suits me to email now, I don't expect a response outside of your own working hours.

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: 1 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:

Infrastructure readiness and viability of the energy transition:

- More than 10 TWh of renewable electricity was curtailed in Scotland in 2025, enough to power every household in the country for a year, a report has found.
- According to energy market data provider Montel, Scottish electricity generators accounted for more than 98% of the volume, with almost all curtailment payments related to wind energy.
- Scottish wind farms were paid around £343m to reduce output, representing 94% of total curtailment costs in Great Britain.
- Northern Scotland alone accounted for 8.8 TWh of curtailed wind generation in 2025, at a cost of almost £300m.
- Montel said this meant only 61% of the wind power that could have been generated in the region was delivered to the grid, with the remaining 39% switched off due to transmission constraints.

While it is understandable from a short-term return-on-investment perspective why wind farms are often prioritised over grid upgrades (faster returns, lower political resistance and reduced investment risk thanks to subsidies and curtailment payments), this reverse planning is critically inefficient. Increasing generation capacity without addressing grid limitations reduces economic value and undermines the overall viability of the energy transition.

Misleading claims of alignment with the local community: The use of Scottish Gaelic language and cultural imagery in the presentation of this project is, at best, a branding *faux-pas* and, at worst, an intentional form of cultural instrumentalisation, if not appropriation. This symbolic inclusion, as per on northlandpowerscotwind.co.uk:

"Set in an area approximately 5-13 kilometres off the west coast of the Isle of Lewis, the site of 'Spiorad na Mara' (Scottish Gaelic for Spirit of the Sea) neighbours the unique coastline of western Lewis. This area has deep connections with the seafaring industry. The wind farm's brand identity is a tribute to the lives which were spent at sea in the Outer Hebrides. To this day, working at sea is a popular vocation in these communities."

"The figurehead is a visual reference to some important characters in Hebridean folklore. The Seelie Faeries were said to inhabit the lochs and seas of Lewis, and protect humans. As recently as the nineteenth century, local sea men would offer libations to faeries before a trip to sea, sometimes walking into the water with a cup of brewed ale. Spiorad na Mara's figurehead encapsulates the deep connection that local people share with the environment. It personifies the past and future relationships between Scotland, its people, its stories, and its seas."

implies alignment with local culture in continuity, as well as meaningful participation and shared benefit between the project proponents and the communities. But, we have, in fact, little evidence of this. This is even more concerning given that 88% of residents in Uig have expressed opposition to the project. In this context, the use of Gaelic language and symbolism appears as an intentional instrumentalisation of local culture, a branding exercise that uses Scottish Gaelic as a consumable aesthetics deployed for legitimacy. The project led by external parties should therefore not claim to speak for the local community, or use its symbolism and language, especially given the well-documented opposition.

Distributional asymmetry and climate justice: The transition to renewable energies, supported in principle, becomes tangible when communities are faced with the turbines. It is possible to be both in favour of renewable energy and opposed to exploitation, the latter having been a constant of energy projects in the Highlands and Islands throughout history. This apparent conflict reflects a broader discussion to be having openly about motivations and values, as individuals, communities, corporations, and institutions. Dialogue and transparency about this is key so trade-offs can be debated. Therefore, it is necessary to assess this project within a framework of distributional equity and climate justice, ensuring that the Highlands and Islands are not only burdened with infrastructural and environmental impacts, but are also compensated and benefit accordingly.

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)  _____

***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: Objection - MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis
Date: 01 May 2026 11:53:35

My address:

[REDACTED]
Postcode: [REDACTED]
Email: [REDACTED]
Date: 1 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 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:

- unquantified, increased traffic volumes, noise, pollution, risk and disruption [REDACTED] The Barvas crossroads (A857/A858 junction) is already an accident blackspot.

- long-term detrimental impact to the availability of housing for local youngsters and families who are already priced out of the rental and home owning market, and will be priced out by construction and ongoing maintenance workers.

- detrimental impact to the value of my [REDACTED] property as a result of the changed aesthetics and increased traffic.

- lack of clear benefit to the local community for their energy prices.

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

I respectfully request that this application is rejected.

Yours sincerely,

*Signature: [REDACTED]

*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 in this box because I want my personal details to be kept confidential.

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis
Date: 01 May 2026 10:31:01

My address:

[REDACTED]

Postcode:

Email: [REDACTED]

Date: 1 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 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:

- unquantified, increased traffic volumes, noise, pollution, risk and disruption on the road directly outside [REDACTED] The Barvas crossroads (A857/A858 junction) is already an accident blackspot.

- long-term detrimental impact to the availability of housing for local youngsters and families who are already priced out of the rental and home owning market, and will be priced out further by construction and ongoing maintenance workers.

- detrimental impact to the value of [REDACTED] property as a result of the changed aesthetics and increased traffic.

- lack of clear benefit to the local community for their energy prices.

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

I respectfully request that this application is rejected.

Yours sincerely,

*Signature: [REDACTED]

*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 in this box because I want my personal details to be kept confidential.

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis
Date: 01 May 2026 10:24:31

My address:

[REDACTED]

Postcode:

[REDACTED]

Date: 1 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 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:

- unquantified, increased traffic volumes, noise, pollution, risk and disruption on the road [REDACTED]. The Barvas crossroads (A857/A858 junction) is already an accident blackspot.

- long-term detrimental impact to the availability of housing for local youngsters and families who are already priced out of the rental and home owning market, and will be priced out by construction and ongoing maintenance workers.
- detrimental impact to the value of my property as a result of the changed aesthetics and increased traffic.
- lack of clear benefit to the local community for their energy prices.

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: 

*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 in this box because I want my personal details to be kept confidential.

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011742)
Date: 01 May 2026 10:06:45

Dear Sirs,

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

1. Lack of Community Engagement:

First and foremost, there was no consultation with the communities of Lewis before Crown Estate Scotland identified and leased the N4 area for development. The plan was imposed on our community 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.'

I refer to 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,'. I continue with NPF4 Spatial Principles - Just Transition. 'We will empower people to shape their places.'

2. Lack of understanding, neither regard, 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.

I draw your attention to 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.'

3. 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 impact on 'biodiversity including impacts on birds' must not be ignored. The project 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. This, is just to name a few legal concerns.

4. 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 7h ‘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.’

5. 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.’. Furthermore, the geological assessments of the landscape and seabed that have been conducted previously for other projects affecting our Island are inadequate. I recall that not long ago during the (eventual) public consultation process of the Creed site for SSSEN’s colossal Converter Station, Dr Libero Sandrini, a Geologist based in the University of Bicocca, Milan, conducted a brief assessment with geological mapping data and identified a key fault line running through the location that was proposed at the time by the Creed the Project Lead and his accompanying team were unaware of. This revelation alone further indicated the ignorance of those leading the project - who had no knowledge of such fault line. Yet another example of negligence of those in positions of power both within this project and our government. I trust that you are also aware of the impact of their reckless sampling in this location and that of the salmon numbers in the river.

6. Irreparable Harm to the Tourism Economy and Coastal Character:

The Spiorad na Mara wind farm would permanently industrialise the unspoiled coastal scenery and 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. Our local economy depends on this. 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’.

7. 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.’

8. 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.

9. 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." As my parents are both well into their retirement, to learn of such disruption to what should be final years of leisure and rest, further adds to how outraged I personally feel about this. They are by no means the only individuals who would be affected by this - considering that our island population is that of an ageing one.

10. 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.

Let me remind you of the 2023 Tolsta Stranding; whereby 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.

11. Priority Marine Features and seabed disturbance:

Kelp beds - confirmed present across 10 km² within the intended 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 simply 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.

12. 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.

13. 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).

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.

I respectfully but firmly urge all parties and Scottish Ministers whom we have elected - believing they would carry out best interests - to refuse this application in its current form, and to require, as a minimum condition of any future consideration, a full, transparent, and accessible public consultation with the people of Lewis and the wider Outer Hebrides.

I wish to close not with references to policy, but with something simpler and more true. My family has lived on this island for more than 600 years. Our Island has weathered clearances, hardship, and more than a century of being told that decisions made far away were somehow in our interest. We have watched generations leave because opportunity never came, while the beauty and resource of this place were spoken of by others as assets to be used only for their financial gain.

The Atlantic that would be filled with these turbines is not an abstraction on a map. It is the sea my ancestors fished, my Grandfather, Uncles and my own Father. It is the horizon our future generations will look out upon. It is the living, breathing edge of a culture that has survived against considerable odds - and that deserves, at the very least, to be consulted before it is changed forever.

I believe that I speak on behalf of our wider community that we are not opposed to the future. We are, however, opposed to being erased from it. This planning decision is about the long-term future and the character of a landscape and community that cannot be replaced once altered at this scale. Spiorad na Mara Offshore Wind Farm would cause significant, cumulative and largely irreversible harm to landscape and seascape character, heritage setting, and the tourism economy.

I respectfully request that this application is rejected and further conversations - that are not only essential, but a legal obligation, to projects of such seismic scale - begin.

Yours faithfully,


Of .

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Offshore Planning Application N4
Date: 29 April 2026 14:18:09

Dear Marine Directorate,

I write to object to the offshore planning application in relation to the proposed Spiorad na Mara windfarm, Isle of Lewis.

My objection is based on the fact that [REDACTED] at the north end of the Isle of Lewis and [REDACTED]. Specific objections are as follows:

1. No real economic or energy benefit to the Western Isles. The local population will not benefit directly from the electricity produced and distributed.
2. Detrimental visual and noise impacts of such vast turbines just offshore - very close to land.
3. Negative impact on tourism and consequently of monies coming to the Western Isles, especially the Isle of Lewis.
4. Damage to marine wildlife and birds, and to the coastal environment.
5. Damage to the mental well-being of individuals living within the local area because of, for example, light flickering, dead and damaged wildlife, the imposition of massive construction in a wild environment and with no real local benefit.

Please consider this objection in your planning application decision process.

Yours sincerely,

[REDACTED]