

Member of Public 2314

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection
Date: 04 May 2026 09:04:00
Attachments: [Formal+Objection+Letter+to+Spiorad+na+Mara+Offshore+Wind+Farm+N4 \(1\).docx](#)

Please find attached.

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: 4.5.25

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: This is by far my largest concern. 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'.*

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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**.

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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,'*

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

My further objection points: The vibrations caused by these enormous machines will cause untold damage to the seabed and the wildlife in our waters. The noise will drive away marine mammals. This island is a haven for wildlife, and this is what attracts tourism. Without the beautiful scenery and tourism, this island will slowly die. Wind turbines should be placed far away from land, out in open water, where animals can move away. Moving in lots of people to build these machines will also affect this island, changing its cultures and ways beyond recognition.

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]

***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](#)
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Date: 04 May 2026 08:46:03

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

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:

I objection to this scheme. It's too big, too close and too visible all along the west coast. It is going to badly affect the tourist trade which I'm part of too.

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]

Member of Public 2316

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Spiorad na Mara wind farm rejection
Date: 04 May 2026 08:27:32
Attachments: [Formal+Objection+Letter+to+Spiorad+na+Mara+Offshore+Wind+Farm+N4.docx](#)

Regards [REDACTED]

Sent from [Outlook for Android](#)

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: 04/05/26

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From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743) (MD-00011742 & MD-00011743)
Date: 04 May 2026 01:32:19

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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:

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.

I request my personal details remain confidential.

Member of Public 2318

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Formal Objection, Application ref: MD-00011742 & MD-00011743 - Spiorad na Mara Offshore Wind Farm (N4)
Date: 04 May 2026 01:28:54
Attachments: [REDACTED] - [Objection Letter SpioradNaMara N4.pdf](#)

Dear Sir/Madam,

Please find attached (pdf) my signed formal objection to the above application, submitted ahead of the 7th May 2026 deadline.

I request that this objection be recorded and considered as part of the determination process.

Yours Faithfully,

[REDACTED]

[REDACTED]

To:

Marine Directorate, Licensing Operations Team
Scottish Government, 375 Victoria Road, Aberdeen, AB11 9DB
Email: MD.MarineRenewables@gov.scot

From: [REDACTED]

Address: [REDACTED]

Postcode: [REDACTED] [REDACTED] Date: 04/05/2026

FORMAL OBJECTION

Application References: MD-00011742 & MD-00011743
Spiorad na Mara Limited – Spiorad na Mara Offshore Wind Farm (N4)
Isle of Lewis, Outer Hebrides

I write as a concerned individual to lodge my formal and unreserved objection to the above application. This proposal, if granted consent, would inflict profound, cumulative, and largely irreversible harm upon one of Europe's most extraordinary landscapes, its living culture, its marine ecology, and its communities. I respectfully but firmly request that this application be **refused in its entirety**.

My objection is grounded in the following material considerations, each of which, individually and cumulatively, constitutes a substantial planning failure under Scots law, national policy, and the obligations Scotland has accepted in international environmental agreements.

I. A Fundamentally Deficient Environmental Impact Assessment

The Environmental Impact Assessment Report (EIAR) submitted with this application is, in my considered view, **unfit for purpose**. It relies upon a wide 'design envelope' – the so-called Rochdale Envelope – to avoid committing to specific turbine dimensions, numbers, or precise layouts. The practical effect is that neither the public nor the decision-maker can properly understand or scrutinise the true scale of environmental harm this project will cause.

This approach is not a technical formality. In a landscape as environmentally sensitive and culturally significant as the west coast of Lewis – one defined by dark skies, ancient monuments, protected bird populations, and living Gaelic tradition – the use of this mechanism is wholly inappropriate. It allows the developer to conceal the worst-case scenario behind a veil of deliberate vagueness.

Policy basis: The EIAR is deficient because it fails to assess a realistic worst-case scenario in contravention of the *Electricity Works (EIA) (Scotland) Regulations 2017*. The use of the Rochdale Envelope in this location is inappropriate as it masks the true scale of environmental harm (**NPF4 Policy 4; Marine Scotland Guidance**). The application also contains significant gaps in baseline data regarding local species, constituting a deficient

EIAR under the **National Marine Plan; NPF4 Policy 1**.

II. Unlawful Reliance on Post-Consent Mitigation

Consent is being sought on the basis of promises – promises to produce management plans, species monitoring protocols, and habitat protection strategies that do not yet exist. The developer is, in effect, asking for planning permission for a project it has not yet designed, relying on mitigation measures whose effectiveness cannot be independently verified before the decision is made.

This is not merely procedurally unsatisfactory. It is a fundamental breach of the principle that consenting authorities must be able to properly weigh the proposal – including its harms – before a decision is taken. If mitigation cannot be assessed, the harm cannot be judged. If the harm cannot be judged, permission cannot lawfully be granted.

Policy basis: The reliance on post-consent mitigation means the effectiveness of proposed protective measures cannot be scrutinised (**NPF4 Policy 3; Habitats Regulations**). Key protection plans have been deferred in a manner that creates procedural uncertainty incompatible with the requirements of the *Planning and Infrastructure Act 2025*. Pre-determination of mitigation without evidence-based results fails the test of a robust planning application (**NPF4 Policy 1**).

III. Catastrophic Risk to Protected Birdlife and Marine Habitats

This application does not merely risk harm to birds – the developer has already acknowledged it will cause harm to protected species, by filing a Habitats Appraisal Derogation Case. A derogation is the legal mechanism invoked when a project concedes it cannot avoid damaging a protected area. The submission of a derogation is, in plain terms, an admission.

The development occupies primary foraging grounds for red-throated divers from the Lewis Peatlands Special Protection Area (SPA), falls within the foraging range of the globally significant St Kilda gannet colony, and crosses one of the principal migratory corridors for whooper swan and pink-footed goose in the United Kingdom. The EIAR does not adequately assess collision risk, displacement, or barrier effects for these declining, legally protected populations.

Policy basis: The developer's own Habitats Appraisal Derogation Case proves that this project cannot proceed without damaging a protected nature site (**Habitats Regulations; NPF4 Policy 3**). The proposal fails the Precautionary Principle as there is no evidence beyond reasonable scientific doubt that local bird populations will survive (**National Marine Plan Policy GEN 9**). Granting consent would breach the *Conservation (Natural Habitats &c.) Regulations 1994*, the *Marine (Scotland) Act 2010*, and the *Wildlife and Countryside Act 1981*. The project poses an unacceptable risk to the integrity of the Lewis Peatlands, West Coast of the Outer Hebrides, Seas off St Kilda, and St Kilda SPAs (**NPF4 Policy 4; Birds Directive**).

IV. Failure to Protect Scheduled Monuments and the Cultural Landscape

The Calanais standing stones are among the most profound prehistoric monuments in the world. They are not mere objects. They exist in intimate relationship with their horizon, their seascape, and the wide, open sky that has framed them for five thousand years. This development would permanently place an industrial horizon of flashing turbines into the very setting that gives Calanais – and the many other scheduled monuments across this landscape – their meaning.

The EIAR treats historic sites as isolated points on a map, rather than acknowledging the

cultural landscape as a living whole. It anticipates significant adverse effects on coastal heritage yet proceeds regardless, without identifying any overriding public interest that would justify the deliberate degradation of a landscape of international importance when alternative offshore sites exist.

Policy basis: Development proposals affecting scheduled monuments will only be supported where significant adverse impacts on the integrity of their setting are avoided (**NPF4 Policy 7h ii**). The assessment fails **NPF4 Policy 7** by ignoring the intangible and living heritage of the west Lewis community (**Historic Environment Policy for Scotland (HEPS)**). The project treats the Cultural Landscape as isolated objects rather than a living environment, contrary to **LDP Policy EH1; NPF4 Policy 7**.

V. Destruction of Gaelic Culture and Living Heritage

The Gaelic-speaking community of west Lewis does not experience this coastline as scenery. It is the source and setting of language, story, seasonal practice, and collective identity accumulated over generations. The mòinteach, the shore, the working sea – these are not background to daily life; they are constitutive of it.

The EIAR makes no substantive assessment of these intangible values. There has been no adequate Island Communities Impact Assessment addressing the impact on Gaelic culture and local traditions, as required under the Islands (Scotland) Act 2018. The legal obligation to consider how development affects the distinctive character of island communities has not been met.

Policy basis: There has been an inadequate Island Communities Impact Assessment regarding the impact on Gaelic culture and local traditions, contrary to the ***Islands (Scotland) Act 2018***. The proposal fails to respect the Cultural Landscape as a living environment (**LDP Policy EH1; NPF4 Policy 7**).

VI. Community Engagement Denied – An Imposition, Not a Proposal

No consultation with the communities of west Lewis was carried out before Crown Estate Scotland identified and leased the N4 area for development. The plan was determined and imposed before any community voice could be heard. This is not a failure of process in the technical sense alone; it is a fundamental breach of the democratic compact that should govern decisions of this consequence and permanence.

The Community Opinion Survey published in April 2026 by www.emg-lewis.co.uk found that 88% of residents from Ness to Uig oppose the N4 development. This is not a narrow majority – it is an overwhelming democratic verdict from the very community that will bear the consequences of this decision for generations. To approve this application against such a consensus would make a mockery of Scotland's stated commitment to community empowerment.

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

Policy basis: 'Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes' (**Scotland's National Marine Plan (NMP) GEN 18**). 'We will empower people to shape their places' (**NPF4 Spatial Principles – Just Transition**).

VII. Suppressed Evidence of Mental Health Harm

A Social Impact Assessment conducted as part of this process documented high levels of

stress and anxiety among local residents specifically in relation to this development. This data was not disclosed in the principal public-facing documents. The community was denied access to evidence that directly concerned their own wellbeing and quality of life.

The suppression of this data is not merely ethically troubling — it is a material failure in the transparency obligations that underpin legitimate planning decisions. I object to this non-disclosure as a specific and independent ground of objection in its own right.

Policy basis: The non-disclosure of social impact data prevents transparent assessment of the project's risks, in breach of **NPF4 Policy 14** and the *Aarhus Convention*. The proposal will have a documented adverse impact on mental health and wellbeing, constituting a material violation of **NPF4 Policy 14 (Health and Wellbeing)**.

VIII. Irreparable Economic Harm to the Island

The economic case presented by the developer is misleading in its framing. The construction phase will bring short-term jobs, predominantly to off-island contractors. The operational phase will generate wealth that leaves the island almost entirely. Meanwhile, the tourism economy — which is genuinely local, genuinely sustainable, and genuinely dependent on the unspoiled coastal scenery of west Lewis — will be permanently and materially harmed.

No compliant Island Communities Impact Assessment has been conducted to assess the vulnerability of the tourism sector to this project. No modelling has been provided of the impact on Tourism Gross Value Added. No analysis has been offered of how the 'high magnitude of change' to the seascape will affect visitor numbers. The economic assessment is, in short, incomplete, partial, and inadequate.

Policy basis: The proposal creates a significant socio-economic imbalance and facilitates the export of wealth away from the island (**NPF4 Policy 25; NMP Policy GEN 2**). The EIAR fails to model the impact on Tourism GVA (**NPF4 Policy 30; LDP Policy ED1**). The lack of a compliant ICIA means the vulnerability of the tourism sector has not been legally evaluated (**Islands (Scotland) Act 2018; NPF4 Policy 4**). The development fails the mandate for Community Wealth Building (**NPF4 Policy 25**).

IX. Marine Ecology: Incomplete Surveys, Inadequate Protection

The marine ecological surveys underpinning this application are methodologically compromised. Basking shark monitoring has relied upon biased aerial surveys that ignore the substantial body of land-based data established by local researchers and conservation organisations working in these waters over many years. The result is a systematic underestimate of one of the most ecologically important species using this sea area.

The application also provides no evidence that alternative fishing grounds are available to the displaced local fleet — a fleet that has worked these waters for generations and whose displacement would represent an irreversible economic and cultural loss. The requirement for European Protected Species licences is itself an acknowledgement that environmental impacts are not 'negligible', as has been claimed.

Policy basis: The application contains a significant methodological deficiency through biased surveys that ignore established local baseline data (**NMP Policy GEN 9**). No evidence is provided that alternative fishing grounds exist to prevent industry cannibalisation (**NPF4 Policy 11; NMP Policy GEN 4**). The need for EPS licences proves impacts are not negligible (**NPF4 Policy 3; EPS Regulations**).

X. Destruction of Dark Skies and Threat to Nocturnal Species

The west Lewis coastline is one of the darkest places in the British Isles. The Milky Way is visible to the naked eye. The night sky is not incidental to life here – it is central to the identity, wellbeing, and appeal of this place. This application would place aviation warning lights of exceptional intensity atop each turbine, permanently and irrevocably erasing that darkness.

No adequate nocturnal baseline has been established by the developer. The lethal impact of phototaxis – the fatal attraction of migrating birds to aviation lighting – has been dangerously underestimated. The loss of dark sky amenity would deal a severe blow to astrotourism, an emerging sector of significant economic potential for the island.

Policy basis: The project will cause permanent loss of astronomical amenity, destroying the west Lewis dark sky designation (**NPF4 Policy 30; LDP Policy PD2**). The developer has failed to establish a nocturnal baseline, ignoring lethal risks to nocturnal species (**NPF4 Policy 3; Marine Policy Statement**). The impact of phototaxis on migrating birds has been dangerously underestimated (**NPF4 Policy 4**).

XI. Peatland Destruction and the Hidden Onshore Carbon Cost

This offshore wind farm cannot exist without the onshore infrastructure to connect it to the grid. The cables, substations, and associated works will cut through some of the deepest and most ecologically valuable blanket bog in Europe – the Barvas Moor peatlands, a store of carbon accumulated over thousands of years. By treating the offshore and onshore components as separate applications, the developer has engaged in what amounts to project splitting: a tactic that obscures the true cumulative environmental cost of the development.

Scotland's peatlands are not merely a local ecological concern. They are a globally significant carbon store. Their deliberate degradation, in service of a development that claims to address the climate emergency, represents a fundamental contradiction that this application has not honestly confronted.

Policy basis: The assessment fails to account for total carbon store degradation caused by the peatland works (**NPF4 Policy 1; NPF4 Policy 5 (Soils)**). Failure to assess impacts on irreplaceable machair habitats at the landfall point constitutes a direct breach of **NPF4 Policy 3**. This project is inconsistent with the 2008 AMEC/Lewis Wind Power Ministerial Precedent, which established that the Lewis Peatlands SPA constitutes a 'national interest' whose conservation priority was strengthened further by **NPF4 Policy 1**.

Conclusion

This objection rests not on opposition to renewable energy, but on insistence that the law be followed, the evidence be complete, and the communities most affected be given genuine voice and genuine protection. Scotland has made legal and moral commitments to its island communities, its natural environment, and its cultural heritage. This application, as submitted, fails to honour those commitments.

The cumulative weight of the grounds set out above – procedural, ecological, cultural, economic, and legal – is, in my view, overwhelming. No single objection point stands alone; each reinforces the others to form a comprehensive case that this application has not demonstrated it can lawfully, or ethically, proceed.

I respectfully urge the Scottish Ministers to refuse this application. The landscape, culture, and communities of west Lewis cannot be restored once they are lost. This decision is permanent. It deserves to be treated as such.

I respectfully request that this application is refused.

Yours faithfully

Signature

Name (print)

Note: I confirm that the views expressed in this letter are my own and I intend for my typed or written name above to act as my legal signature for the purposes of this objection.

☒ *I request that my personal details be kept confidential.*

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 21:10:47
Attachments: [KMR Objection to N4 Application.pdf](#)

Dear Sirs,

Please find attached my objection to the above referenced applications.

Kind regards,

[REDACTED]

[REDACTED] [Outlook for iOS](#)

From: [REDACTED]
Sent: Sunday, May 3, 2026 9:04:37 PM
To: [REDACTED]
Subject: Section 36 Consent Application — Application references: MD-00011742 & MD-00011743 — Spiorad na Mara Wind Farm – Isle of Lewis

MD.MarineRenewables@gov.scot

By email:
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 young resident living 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 my childhood home would be forever changed for the worse. Significant amendments to the current application need to be made to reconsider the N4 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 night. 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 N4
Date: 03 May 2026 20:51:27

My address: [REDACTED]
Postcode: [REDACTED] Email: [REDACTED] Date: 03/05/26

MD-00011742 & MD-00011743 - Sp orad na Mara L m ted - Sp orad na Mara Offshore W nd Farm - Is e of Lew s

To whom it may concern,

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 the 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 relating to the 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 Biodiversity 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 proposals likely to adversely affect the integrity of the following SPAs: Lewis Peatlands, West Coast of the Outer Hebrides, Seas off St Kilda and St Kilda.
NPF4 Policy 7 *'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 *'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 proposals would harm the Canaan's monuments and wider historic landscape by introducing an industrial horizon into the 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 overriding public interest for choosing these sites.
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:' significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or 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 without onshore impacts on riparian, machair and deep peat and remains unassessed, directly contravenes NPF4 Policy 3, which requires biodiversity (including riparian and machair) to be left in a demonstrably better state. In addition, the proposals fail 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 Sp orad 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 livelihoods depend. Tourism 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 Sp orad na Mara Offshore Wind Farm Development (N4) published by www.emg-ew.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 intended industrialisation of the Isle of Lewis and to turn the Hebrides into a wind factory without community consent and/or support (and without satisfactory assurance that the community would receive any tangible benefit), would result in nothing less than a modern day Clearance. These islands are more than just a resource to be plundered by those who seek profit.

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. Sporadic Moray 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 be 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

	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-00011743)
Date: 03 May 2026 20:05:59

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 National Marine Plan (NMP) GEN 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 SPAs: 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 areas 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 Scotlands 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 Mhàr 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:

It will destroy environmental areas, negatively impact the wildlife and turn stunning islands into an absolute

eyesore, all in the name of profit. Build them in the sea if you have to, but not on the sacred land. Find another way before there's no land left in Britain to sell.

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.

[Yahoo Mail: Search, organise, conquer](#)

Member of Public 2322

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Formal Objection to Spiorad na Mara OSWind Farm, Isle of Lewis
Date: 03 May 2026 18:23:07
Attachments: [SMP OWE for submission V2.docx](#)

I formally object to the above application
MD-00011742 & MD-00011743 - Spiorad na Mara Limited.

Objection submitted on 2nd May 2026 by:

[REDACTED]

OBJECTION TO SPIORAD na MARA OFFSHORE WINDFARM APPLICATION

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

From: [REDACTED]

Email: [REDACTED]

Date: 22 April 2026

Subject: 1. Location of Site and Key Considerations (as within the updated Sectoral Marine Plan for Offshore Wind Energy)

1.1 Prevention of Ecological Degradation

The environmental damage observed off the East Coast of Scotland,, due to long-term industrial renewable energy (RE) impacts, is now well-documented. These detrimental effects on marine biodiversity must not be replicated off the West Coast of the Isle of Lewis. Given the evidence of prior ecological harm, the Scottish Government should adopt a strategy of avoidance rather than repetition.

1.2 Impacts on Marine Industry and Biodiversity

The proposed development represents an irresponsible "spatial squeeze" on local fishing businesses. Industrial seabed activities—specifically turbine anchorage and the excavation required for industrial cable trenching—pose a critical threat to this protected marine environment.

Furthermore, there is a clear correlation between early offshore wind (OSW) testing procedures and an increase in sea-mammal mortality. The current rate of species loss is unsustainable and constitutes a violation of National Planning Framework 4 (NPF4). By placing protected populations at risk, the project undermines the conservation status of an area that has historically served as a sanctuary.

1.3 Application of the Precautionary Principle

While developers assert that these impacts lack definitive proof, they often rely on denial rather than constructive dialogue. In accordance with established scientific standards, the **Precautionary Principle** should be applied: where there is a risk of significant or irreversible damage, the lack of full scientific certainty should not be used as a reason for proceeding. Failure to learn from the "annihilation" of ocean ecosystems in the North Sea Development Zone, risks repeatedly driving local species toward extinction.

1.4 Protection of Coastal Natural Defences

Industrial sedimentation from existing North Sea developments has placed immense pressure on marine life, including slow-growing corals that take hundreds and even thousands of years to mature. These corals are vital components of the undersea habitat and serve as a natural defence against coastal erosion and flooding. Protecting the pristine waters of the Hebridean coast is essential for maintaining this natural balance. According to data from the National Energy System Operator (NESO), Scotland's current energy production already exceeds its modest consumption; therefore, further development should not come at the increasing cost to marine health.

Marine Protected Areas (MPA)2.0: “Highly Protected Marine Areas” (HPMAs) were rebranded and refined in 2025. While the N4 site may not be an HPMA, the 2025 Seabed Protection Directive gives much more weight to “Bethnic carbon Sinks” (the carbon stored in the seabed). Therefore the point about industrial sedimentation carries much more weight under this carbon-storage policy.

1.5 Community Connectedness and Stewardship

Local communities possess a deep, multi-generational understanding of the environments they rely upon. This connectedness fosters a sense of stewardship that is essential for true sustainability. The current trajectory of industrialization threatens to unbalance nature and cause permanent harm to the lands and seas that sustain these communities.

1.6 Formal Request for a Moratorium

To ensure the future viability of Scotland’s Highlands and Islands, all offshore industrialization must be paused immediately. We call for a **formal Moratorium on all renewable energy infrastructure** until a comprehensive national plan is developed and the full cumulative impacts of these projects have been transparently assessed. Only through such a pause can the Scottish Government ensure that its energy strategy is truly sustainable and respectful of both ecological limits and community rights.

2. Benefits of Offshore Wind Development: Specific Analysis of Spiorad na Mara (N4)

2.1 Requirement for a Comprehensive Moratorium

Any purported benefits of the Spiorad na Mara offshore wind development cannot be verified or realized without an immediate and complete moratorium on all renewable energy developments and their associated infrastructure. A pause in development is essential to allow for a rigorous, evidence-based accounting of existing environmental impacts. Only through such a moratorium can the cumulative impacts of these projects be fully assessed and understood, rather than continuing a "headlong rush" into offshore and onshore industrialization—a strategy currently driven by financial alliances and funding cycles rather than ecological understanding.

2.2 Community Engagement and the "Unjust Transition"

The current planning process systematically excludes local populations, with communities often remaining unaware of development proposals until they are too far advanced to be meaningfully influenced. For the Highlands and Islands of Scotland to remain viable, communities must be integrated into the decision-making process from its inception.

The prevailing government process is undermining the health, well-being, and empowerment of local residents. Rather than a "Just Transition," the current trajectory represents a "Very Unjust Transition" characterized by:

- **Disempowerment:** The systematic erosion of community agency and the role of local residents as protectors of their environment.
- **Over-Industrialization:** The rapid destruction of Scotland’s ancient landscape and heritage through unplanned and inappropriate industrial expansion.

- **Social Impact:** The exploitation of local communities to meet external industrial targets, leading to a loss of sustainability and social cohesion.

2.3 Site Incompatibility and Ecological Risks

The N4 (Spiorad na Mara) and Havbredey sites serve as primary examples of inappropriate industrial siting. These developments are located within critical migration corridors and pathways for visiting sea mammals.

A significant failure in the current regulatory framework is the granting of consent for industrial works during peak biological periods. Activities are permitted at times when the seas are at their most abundant, causing severe disruption to resident and migratory species. The resultant acoustic pollution and industrial activity "scare and frighten" these populations, leading to avoidable mortality and the degradation of rich marine habitats.

2.4 Policy Conflict with NPF4

The development of Spiorad na Mara in this specific location is fundamentally irresponsible. Under the principles of National Planning Framework 4 (NPF4), which emphasizes the protection of biodiversity and community well-being, there is clear policy support for rejecting this application. The preservation of Scotland's marine and terrestrial heritage must take precedence over ill-conceived industrial developments in ecologically sensitive areas.

3. Mitigations: Assessment of Social Impact and Consultation Validity

3.1 Limitations of Mitigation in Inappropriate Locations

In the context of the N4/Spiorad na Mara development, mitigation measures are viewed as insufficient. At best, mitigation can only marginally reduce the negative impacts resulting from the industrialization of an ecologically and socially sensitive location. For a proposal to be viable, it must be thoroughly vetted for site-suitability prior to the introduction of biased or unsubstantiated claims regarding public support.

3.2 Misrepresentation of Community Sentiment

A significant concern regarding the integrity of the planning process is the erroneous reporting of local opinion. Within the Sectoral Marine Plan for Offshore Wind Energy (SMP-OWE), Comhairle nan Eilean Siar (CnES) representative John Cunningham asserted that the local community was "happy about N4."

Evidence demonstrates that this statement was:

- **Factually Incorrect:** The statement was entirely unsupported by community consensus.
- **Misleading:** It misrepresented the local stance within a formal government framework.
- **Irresponsible:** By employing this narrative, the representative ignored the reality of community sentiment, which has transitioned from concern to profound, agonizing stress over several years.

3.3 Evaluation of Stakeholder Engagement and "Sense of Place"

The current "engagement" process is perceived not as a collaborative dialogue, but as an adversarial struggle. Local residents are being forced to defend their fundamental rights, their "Sense of Place," and their future viability against external industrial interests.

The developer, Northland Power, has demonstrated a lack of meaningful connection to the local environment and its inhabitants. The current approach is characterized by:

- **Unilateral Power Dynamics:** A dominating presence that lacks true interactivity.
- **Superficial Consultation:** While labelled as "engagement," the process is experienced by the community as humiliating and dismissive.
- **Psychological Impact:** The perceived mockery of local concerns has led to a breakdown in trust, further exacerbating the social damage caused by the proposal.

3.4 Conclusion on Social Mitigation

Social impacts cannot be mitigated when the foundation of the proposal rests on a misrepresentation of community views and a failure to recognize the intrinsic value of the location. True mitigation would require a fundamental reassessment of the project's site-suitability and a genuine commitment to community-led decision-making.

4. Economic Impacts: Strategies for Avoidance and Alternative Models

4.1 Transition Toward Localized Energy Generation

To avoid the negative economic impacts associated with large-scale offshore industrialization, a shift toward localized, community-led renewable developments is required. Prioritizing small-scale projects designed for community empowerment would ensure that financial benefits remain within the local economy. Implementing a "power produced where power is needed" model would eliminate the requirement for thousands of miles of expensive, unsustainable subsea cabling and associated transmission infrastructure.

4.2 Economic Injustice and the "Unjust Transition"

The current accelerated development strategy, driven by government and corporate interests, imposes excessive social and economic costs on local populations. Rather than fostering prosperity, this process is contributing to increased energy poverty within rural communities. This trajectory contradicts the spirit of a "green" transition and represents a failure to adhere to the community-wealth-building principles outlined in National Planning Framework 4 (NPF4).

4.3 Policy of Avoidance vs. Mitigation

The current reliance on "mitigation" is logically flawed; it is an attempt to compensate for avoidable damage after the fact. Economic and ecological stability is better served by a policy of avoidance. Mitigating damage in one location by claiming to provide compensation in another does not constitute a balanced or sustainable approach to regional development.

‘The Saturation Threshold’: In late 2025 the Scottish Government introduced a Saturation Threshold for the Highlands and islands. This means that if a region (like Lewis) can prove it already holds enough infrastructure to meet its own local net-zero needs, the weight given to national energy targets decreases. **Recommendation** : keep your ‘power produced where power is needed’ argument hits this new 2026 policy directly.

4.4 Grid Capacity and Local Barriers

Local communities on the Isle of Lewis are currently prohibited from pursuing their own private "Just Transition" due to grid constraints. SSE/SSEN has indicated that grid capacity is being reserved exclusively for large-scale onshore and offshore industrial renewable projects. Consequently:

- **Micro-generation is restricted:** While small-scale solar is permitted, residents are barred from installing small turbines.
- **Lack of Local Benefit:** The grid is being prioritized for industrial export rather than local energy security. This creates a cost-disbenefit to community: grid-costs become integrated into our increasing energy bills. The second cost-disbenefit to community is refunding the CfD subsidy that government uses to incentivise developers, and which effectively presents developers with a guaranteed risk-free income for 15/20 years. While public energy costs further increase.
- **Burden of Hosting:** Rural communities are forced to host the infrastructure and endure the associated pollution and loss of "Sense of Place" without receiving the economic benefits of the energy produced on their doorstep.

A further burden of hosting is the development of locally situated ‘Workers Camps’ which put huge strain on local infrastructure and excessively add to the rushed industrialisation of small communities that are forced to suffer the negative consequences: excessive irregular industrial noise, in highly tranquil locations; particulate weighted industrial air pollution wafting through their island homes and turning outdoor blowing-dry washing to grime. Already a whole natural way of life is compromised. Communities are bereft. Disbenefits.

4.5 Conclusion on Economic Sustainability

True economic sustainability cannot be achieved through a model of irresponsible industrialization that burdens residents with high costs and a degraded way of life. A professional and logical alternative must prioritize local energy needs and remove the barriers currently preventing communities from developing their own sustainable, small-scale energy solutions.

5. Can the environmental impacts of N4 be mitigated?

Assessment: No. Mitigation is only possible when a development is proposed for an appropriate site; N4 does not meet this fundamental criterion.

The current "one-size-fits-all" approach to planning is insufficient for the complexities of this location. Effective mitigation requires a comprehensive Cumulative Impact Assessment that involves all stakeholders, particularly local communities. Public involvement is essential to ensure that developments are geographically appropriate and to establish a clear threshold for when the

cumulative burden on an area has reached its limit. The threshold for damage is therefore very low in this particular location: and this demands attention to The Precautionary Principle if we are to save our ancient, noble and pastoral Home from the catastrophic chaos of inappropriate, irresponsible and unjust over-industrialisation.

This Particular area is so excessively natural and sensitive, that these conditions ascertain its high vulnerability to anthropogenic damages.

The absence of a strategic Cumulative Plan for the Renewable Energy industry in Scotland and its Islands has led to a chaotic and unmitigated situation. A primary example of this systemic failure occurred when Alasdair Allan, acting as a stand-in for Gillian Martin, rapidly granted consent for a windfarm in Strathoykel despite highly significant public objection. This decision was made in an area already suffering from gross over-development: a move that was irrational from both a community and a Net Zero perspective. That small Strathoykel community has been devastated and broken, and Alistair Allan hammered in the last nail in their coffin with apparent glee. He even laughed when asked about what he had done, and all for a man-made target, that was never even debated in parliament before being slotted into the statute books.

Granting consents based solely on meeting numerical targets, rather than environmental or social suitability, is irresponsible. Such a process ignores the destructive reality of these projects and prioritizes developer interests over the welfare of the environment and the local population.

For these reasons, N4 remains an inappropriate development that cannot be made acceptable through standard mitigation measures. And especially in the face of a complete lack of 'prior/early/in the first-instance' assessment of Community Reaction, when N4 was just a proposal. Communities were in fact misrepresented by the CnES representative who is quoted, indelibly, in the SMPOWE.

6. The Necessity of Direct Community Involvement in Environmental Monitoring

6.1 Deficiencies in the Current Environmental Impact Assessment (EIA)

The existing Environmental Impact Assessment process has failed to identify or account for critical ecological data of which local communities are acutely aware. This information gap, combined with a recent regulatory trend toward de-prioritizing previously protected environmental features, creates a high risk for unsustainable environmental catastrophe. The Spiorad na Mara site is characterized by an exceptionally high degree of "naturalness" and ecological sensitivity that the current assessment appears to have overlooked.

6.2 Ecological Significance of the N4 Site

The proposed development area sits within a vital marine habitat that serves as:

- **Commercial Fishing Grounds:** Primary areas for local lobster fishing.
- **Spawning and Nursery Grounds:** Critical habitats for haddock and various shellfish species essential for local consumption and biodiversity.

- **A Legacy of Protection:** This area was designated as a "nautical protection zone" decades ago by independent, highly qualified surveyors. The current richness and health of these seas are the direct result of this long-term, deliberate nurture and high-order protection.

The decision by Comhairle nan Eilean Siar (CnES) to offer this long-term successfully protected, and therefore highly biodiverse and unique, area for industrialization represents a failure of due diligence. Decision-makers have a professional and ethical obligation to be transparent and to honour the specialized knowledge of the surveyors who originally established these protections to maintain balanced sea systems. The Shipping lane was sited at 12 miles off these very shores, to avoid potential pollution incidents. And now irresponsibility and lack of qualified knowledge and understanding has enabled a windfarm site to be created just 3 miles off these very same long-term-protected shores. A private deal. Communities were never assessed for their vitally important reaction. They were bypassed by CnES. And we have consequently suffered from that wilful negligence ever since.

6.3 Correlation Between Industrial Surveys and Cetacean Mortality

There is a documented and alarming trend of mass strandings and mortalities among sea mammals coincident with RE industrial survey activity:

- **2023 Statistics:** 55 pilot whales died on NE Lewis; 77 died in Orkney (Sanday/Eday); with similar tragedies occurring in Skye and Caithness. Such trends are witnessed across the world.
- **Causal Links:** These events are viewed as avoidable deaths of entire population groups, likely caused by acoustic trauma and disorientation resulting from high-decibel seabed surveys conducted for the Spiorad na Mara project.

6.4 Failure of Regulatory Oversight

Despite formal requests from the public, Marine Scotland failed to intervene or halt surveying activities during seasonally sensitive periods when the seas were at their most populous with feeding and breeding mammals. This lack of responsiveness resulted in a predictable ecological tragedy and whole population threats.

6.5 Conclusion: Community-Led Monitoring

To rectify these failures, communities must be directly involved in the monitoring process. Local residents possess the specific, longitudinal knowledge required to safeguard these waters. It is imperative that the Scottish Government and regulatory bodies move away from negligent, "top-down" assessments and instead incorporate the rigorous, area-specific expertise of the communities that have successfully protected these seas for generations.

7. Governance and Environmental Impact Assessment

7.1 Limitations of a Unified Policy Framework

Current governance structures are failing to recognize that a "one-size-fits-all" approach to the Sectoral Marine Plan for Offshore Wind Energy (SMP-OWE) is fundamentally incompatible with the

diverse needs of local communities, marine ecosystems, and regional economies. The intricate, balanced nature of sustainable seas requires a site-specific ecological understanding that a centralized, blanket policy cannot provide.

7.2 The Requirement for Diligent Planning

While a standardized plan may offer administrative expediency, it cannot produce a justifiable or equitable outcome. True sustainability necessitates rigorous, detailed work rather than procedural shortcuts. The Scottish Government must move beyond high-level planning to conduct the localized analysis required to ensure "Just" outcomes for all stakeholders.

7.3 Community Oversight and Engagement

Scottish communities possess the willingness and expertise to serve as conscientious overseers of their local environments. Historically, this resource has been neglected or avoided, leading to the current trend of damaging environmental and social outcomes. Effective governance must integrate community-led oversight to ensure accountability and long-term viability.

7.4 Failure of Conservation Mandates

There is a growing concern that Marine Scotland (MS) is failing to uphold its primary mandate: the protection of habitats and the delivery of positive conservation outcomes. The prioritization of excessive renewable energy (RE) industrialization over ecological preservation has resulted in the degradation of protected areas. Governance must be recalibrated to ensure that industrial targets do not override the essential protection of Scotland's natural heritage.

8. Cumulative Evidence and Long-Term Environmental Hazards

8.1 Preservation of Carbon Sinks and Marine Ecosystems

A sustainable global environment requires the preservation of the seabed and seafloor as critical components of carbon sequestration and oxygen production. The industrialization of the N4 site threatens to irreparably damage these ocean systems through anthropogenic interference. By observing the ecological degradation of the East Coast, the Scottish Government must act to prevent the West Coast from becoming a similarly sedimented and failing marine environment. The Isle of Lewis serves as a vital sanctuary for resident, visiting, and migratory species that rely on these warm, nutrient-rich summer seas for survival.

8.2 Disruption of Natural Light and Biological Rhythms

The proposed Spiorad na Mara development is located in a site fundamentally unsuitable for high-intensity industrial lighting. The introduction of permanent artificial illumination poses a severe threat to:

- **Biological Patterns:** Natural moonlight and darkness is essential for the breeding and feeding cycles of numerous marine species. Artificial light pollution disrupts the natural rhythms which create the Dawn and Dusk patterns that assure the feeding and reproductive regimes essential for sealife to thrive in this location. Lighting up a natural dark sky threatens the long-term viability of the local ecosystem and its thriving populations. Impacted species fail

to feed and are displaced to find food, which makes them susceptible to predation. Not finding mates disables reproductive activities and whole populations decline.

- **Heritage and Well-being:** The project will eliminate the rare and unique dark skies of the West Coast, obscuring the Milky Way and the Aurora Borealis. This constitutes a loss of natural heritage for local communities and future generations.
- **Residential Impact:** The coastal homes of the Isle of Lewis will be subject to light intrusion, altering the character of the settlement and the well-being of its inhabitants.

8.3 Cultural and Ancestral Connectivity

The West Coast is defined by a deep historical and cultural connectivity between the land and the sea. For local communities, the sea is not merely an industrial zone but a place of ancestral significance and daily livelihood. The "stark industrial embodiment" of a windfarm at this scale diminishes the ontological worth of the landscape and the cultural identity of those who serve as its traditional guardians.

8.4 Chemical Pollution and Leading-Edge Erosion (LEE)

A critical, though often under-addressed, hazard of offshore wind infrastructure is the severe shedding of toxic substances through turbine blade erosion. The harsh marine environment of the West Coast is particularly erosive—characterized by wind-blown waves of sea salt, sand and shell particulate matter, with severe storm forces, hail stones the size of golf-balls, —the erosion of blade coatings is significantly accelerated. This process releases:

- **PFAS (Forever Chemicals):** Highly persistent toxic chemical carcinogens, and hormone- and reproductive disruptors, affecting both marine life and humans.
- **Micro and Nano-Plastics:** Particulate matter that enters the food chain, impacting local stock, seafood, and human health.
- **Toxic forever-chemicals** bond with, and are therefore carried by, nano- and microplastics. They will be wind borne to these very close shores.

8.5 Quantitative Risk Assessment of Toxins

Based on data submitted to the UK Government's Environmental Audit Committee (EAC) Inquiry into PFAS (May 2025), the projected pollution levels for a project of this scale are significant:

- **Annual Erosion:** A **single** large-scale turbine (as in N4) can shed up to **100 kg** of coating material **annually**.
- **Cumulative Impact:** For a **60-turbine array**, this results in the release of up to **6,000 kg (6 tonnes)** of toxic chemicals and microplastics into Particularly Sensitive Seas, **every year**.
- **Project Lifespan:** Over a **35-year** operational period, this equates to **210 tonnes** of toxic discharge into a fragile, balanced ecosystem.

8.6 Conclusion: Environmental Incompatibility

The Spiorad na Mara project presents a direct conflict with conservation and preservation mandates. The accumulation and dispersive spread of chemical toxins and the disruption of the natural physical environment constitute an unacceptable risk to the Isle of Lewis. We maintain that the industrialization of this sacred and ecologically vital area is an error of judgment that prioritizes corporate profit over the health and future of Scotland's natural world and communities.

9. Supplemental Considerations and Strategic Recommendations

9.1 Evaluation of Site Allocation and Governance

The decision by the Crown Estate to offer lease sites in ecologically sensitive areas, specifically the N4/Spiorad na Mara site, appears fundamentally misguided. The original proposal for this area by Comhairle nan Eilean Siar (CnES) reflects a failure to account for the site's exceptionally high degree of "naturalness." Proceeding with the industrialization of a region with such verified environmental sensitivity constitutes a form of administrative negligence that risks long-term ecological and social instability.

9.2 Human Rights and Regulatory Compliance

The current approach to offshore wind development raises significant concerns regarding the **Aarhus Convention**, which mandates public participation and access to justice in environmental decision-making. The perception that technocratic government bodies and commercial power companies treat local communities as mere "leverage points" to be exploited indicates a breakdown in democratic engagement. This coercive environment contributes to social decay and undermines the moral fabric of the community, potentially constituting a violation of fundamental human rights.

9.3 Call for a Strategic Moratorium

To ensure a sustainable future for Scotland, an **immediate Moratorium on all renewable energy infrastructure development** is required. This pause is essential to:

- **Quantify Accumulated Damage:** Allow for a comprehensive, independent assessment of the impacts caused by existing inappropriate developments.
- **Assess Cumulative Risks:** Evaluate the total environmental and socio-economic burden on the Highlands and Islands before additional capacity is sanctioned.
- **Protect Regional Viability:** Prevent further irreversible loss of biodiversity and cultural heritage.

9.4 Community Integration and Public Health

The exclusion of local residents from the decision-making process has escalated beyond a planning dispute into a documented mental health emergency. Communities, as the primary observers of environmental change, must be integrated as core stakeholders in all future processes.

9.5 Alignment with the National Islands Plan

The current trajectory of the Spiorad na Mara project is in direct conflict with the objectives of the **National Islands Plan**. A strategy that prioritizes industrial expansion at the cost of community well-

being, mental health, and environmental integrity is not only unsustainable but also antithetical to the government's stated commitment to supporting island life. For the plan to remain credible, the Scottish Government must address these systemic failures in consultation and site selection.

10. Impacts on Children's Rights and Wellbeing

10.1 Intergenerational Justice and Environmental Stewardship

To ensure the viability of future generations, the Scottish Government has a duty to maintain a healthy, living environment in which children can thrive. The current trend of over-zealous industrialization across the Highlands and Islands has forced communities to unite against what is perceived as institutional bullying. Local-residents refuse to allow the next generation to inherit a landscape where the systematic degradation of "ancient and noble" lands is normalized as just or fair.

10.2 Cultural Rootedness vs. Modern Dispossession

The identity of the Outer Hebrides is founded upon crofting, fishing, common rights, tourism, and conservation. Children in these communities grow up with a profound "rootedness" and an inherent understanding of their environment. The proposed N4/Spiorad na Mara development represents an unacceptable economic and social disruption that mirrors the historical trauma of the Highland Clearances. By prioritizing economic performance over "ontological worth" (the nature of being), the state risks displacing human-centered societies with a system driven by unbridled resource consumption.

10.3 The Right to a Healthy Environment

Under international human rights standards, children have an absolute right to grow up in a healthy, natural, and nurturing environment. The Spiorad na Mara project threatens to undermine this right, through:

- **Ecological Alienation:** The transformation of a protected, spiritual seascape into a high-density industrial zone.
- **Accumulated Waste:** The introduction of noxious industrial waste and chemical pollutants into pristine waters, reversing decades of successful conservation.
- **Spiritual Impoverishment:** The reduction of the earth and seabed—a "land grab" of traditional resources—to mere utility and property.

10.4 Psychological and Cultural Displacement

The "attractive packaging" of community benefit funds and negotiations cannot compensate for the loss of cultural heritage and psychological well-being. The renewable energy industry is currently encroaching upon the few remaining cultures capable of teaching sustainable living. This pursuit of growth, driven by external greed, threatens to exceed the carrying capacity of these remote regions and dismantle the native connectedness that families pass down to their children.

10.5 Ancestral Heritage and the "Sense of Home"

Children have a right to understand the unique lands and seas that constitute "Home" without the interference of unilateral industrial power. The western seascape is not merely a resource; it is a wild open space guarded by ancestral history. Forcing oppressive industrial circumstances upon these communities mitigates against human nature and cultural continuity.

10.6 Conclusion: A Call for Protection

The Outer Hebrides must be permitted to maintain their unique character and sustainable way of life. We must protect what is currently plentiful—our natural beauty and ecological health—to ensure it does not become a scarcity for our children. The Scottish Government must respect the rights of the next generation by rejecting developments that sacrifice long-term human and environmental well-being for short-term industrial gain.

11. SMP-OWE: Community Misrepresentation and the Protection of Vital Habitats

11.1 Discrepancies in Reported Community Opinion

There is a documented and profound disparity between the "community opinion", reported by Comhairle nan Eilean Siar (CnES) representative John Cunningham in the 2020 Sectoral Marine Plan for Offshore Wind Energy (SMP-OWE), and the actual views held by the affected local population. The community was not consulted on the narrative presented by Mr. Cunningham and considers his assertion that the locale is "happy about N4" to be a total misrepresentation of public sentiment. In reality, entire local communities are unified in their opposition to the N4 proposal, which seeks to industrialize 50 square miles of protected seas just three miles from the shoreline.

11.2 Historical Precedent and Linked Developments

Community opposition is consistent and established. In 2023, the community formally rejected a proposal for an Ammonia Plant on Flodaigh Island in Little Loch Roag. This industrial project was intrinsically linked to N4, as it would have required a subsea cable connection from the windfarm. The repeated failure of CnES representatives to acknowledge prior community reactions/rejections of these interdependent projects indicates a complete lack of transparency and a disregard for local democratic input.

11.3 Site Incompatibility and Ecological Sensitivity

While the SMP-OWE is intended to facilitate large-scale commercial development, the West Coast of the Outer Hebrides is a fundamentally inappropriate location for such aggressive industrial activity. The project poses an existential threat to the seafloor and marine life due to:

- **Physical Destruction:** Permanent damage from massive turbine anchorage and the excavation of deep trenches for industrial subsea cabling.
- **Conservation Success:** These seas are "particularly sensitive" and have thrived precisely because they have remained unadulterated by heavy industry.
- **Protection Standards:** The historic relocation of the shipping lane to 12 miles offshore—conducted after rigorous independent assessment—was specifically designed to mitigate

pollution risks. The N4 project would effectively dismantle these successful protections by reintroducing industrial hazards into the near-shore environment.

11.4 Comparative Ecological Decline

The decline of the North Sea off Scotland's East Coast provides a stark warning. Excessive industrialization by the renewable energy industry has resulted in high levels of sedimentation and "suffocating particulate deposition," turning once-vibrant waters into a degraded ecosystem. We maintain that the Scottish Government must not allow the same "spatially greedy" industrial model to destroy the unique and sacred environment of the Isle of Lewis.

11.5 Accountability and Community Impact

The misrepresentation of community opinion in official government documents has caused significant social and emotional distress, leading to a breakdown in trust between the islanders and their local authority. The community is currently engaged in a taxing struggle to defend its "Sense of Place" and its most valuable natural assets against an industrial threat.

11.6 Conclusion: The Mandate for Preservation

The N4 proposal represents a realistic and unacceptable pollution threat to a vulnerable marine ecosystem. Given the high degree of naturalness and the essential nature of these habitats to regional biodiversity, "No to N4" is a biological and social necessity. These seas must be reserved, preserved, and conserved. We remain wholeheartedly and officially opposed to the Spiorad na Mara/N4 development and call for the formal correction of the record regarding early community consensus. (SMPOWE quotes by John Cunningham, CnES). Early community reaction failed to be assessed in regard to N4 siting. A fundamental of NPF4.

12. Nationally Significant Protection for West Coast Lewis and Outer Hebridean Waters

12.1 Integrity of Existing Maritime Protections

The West Coast of Lewis has benefited from robust protection against maritime pollution incidents for nearly 50 years. The current proposal represents an irrational attempt to remove these long-standing safeguards without adequate debate, engagement, or professional consultation. It is professionally concerning that essential, enduring protections for an extremely vulnerable sea area can be disregarded through the influence of unqualified decision-making. The essence of this maritime protection zone must be maintained to ensure regional ecological stability.

12.2 Projected Chemical Pollution and Leading-Edge Erosion

The N4/Spiorad na Mara development introduces a predictable and catastrophic pollution risk via the erosion of turbine blade coatings. In this exceptionally harsh offshore environment, the degradation of epoxies and resins will release substantial quantities of toxic substances, including "forever chemicals" (PFAS) and microplastics.

- **Volume of Pollutants:** Estimates suggest that up to 6,500 kgs of toxic chemical pollutants plus microplastics could be released annually, over each of the 35 years of the project's lifespan.

- **Environmental Dissemination:** These toxins are dispersed by wind and sea (storms, tides, currents and swells): contaminating beaches, coastal residences, and food chains.
- **Agricultural and Public Health Risks:** Wind-borne toxic spray poses a direct threat to grazing livestock, local produce, and the health of residents, including children, in close-proximity coastal homes. Seawater becomes a toxic chemical soup. The sea is also used for recreation.

12.3 Threats to the Seafood Industry and Nursery Grounds

The Outer Hebrides is a region of national significance for seafood production and consumption. The N4 site directly overlaps with:

- **Local Lobster Fisheries:** A vital economic resource that operates precisely within the proposed development area.
- **Haddock Spawning and Nursery Grounds:** Essential habitats that currently thrive in these unpolluted waters but face total disruption from industrial activity.

12.4 Destruction of Benthic Habitats and "Sense of Place"

The physical installation of the windfarm—specifically the extensive anchorage systems and the deep trenching required for subsea cabling—will cause irreparable damage to the seafloor. This environment is an integral feature of the local "Sense of Place" and the foundation of the islanders' identity. The industrialization of these waters constitutes a coercive threat to self-sufficient communities and the coastal environments they rely upon.

12.5 Conclusion: Avoiding Regional Ecological Failure

The documented degradation of the East Coast of Scotland serves as a definitive warning of the consequences of excessive offshore industrialization. Permitting the same ecological "trashing" of the Outer Hebridean West Coast would be an irresponsible and unforgivable failure of governance. We call for the continued preservation of these waters as a matter of national importance.

13. Socio-Economic Impact and Procedural Failures: A Community at Risk

13.1 Impact on Community Health and Wellbeing

Local communities on the Isle of Lewis are currently engaged in an arduous and persistent struggle to preserve their unique heritage and way of life. This prolonged state of uncertainty regarding the N4/Spiorad na Mara development has resulted in a documented decline in community health, characterized by a significant increase in stress and a deteriorating mental health landscape. The perceived exploitation of local geography for external commercial gain has deeply compromised the residents' sense of security and "Sense of Place."

13.2 Environmental Sustainability and the "Unjust Transition"

The current trajectory of offshore industrialization is viewed by the community as a "Very Unjust Transition." Far from being a "green" or "clean" initiative, the proposal threatens to introduce decades of heavy industrial activity into a highly vulnerable environment. We contend that this will lead to a predictable and catastrophic collapse of a nationally significant ecosystem. Such an

outcome would result in the permanent extinction of a unique, nature-based Hebridean way of life—an asset far too valuable to be subjected to such industrial risk.

13.3 Failures in Local Authority Representation

There has been a persistent failure by Comhairle nan Eilean Siar (CnES) to adequately represent the views of its constituents to the Scottish Government. Despite numerous opportunities to act as a representative stakeholder:

- **2023 Inactivity:** CnES provided no formal response to the government regarding community concerns over N4 during the 2023 period.
- **July 2024 Engagement:** While a meeting was held in July 2024, the authority again failed to accurately convey the depth of community opposition to the project.
- **Perception of Bias:** This lack of transparency suggests a systemic bias within the local authority against community views, effectively silencing the voices of those most directly impacted by the proposal. (800 public objections: 1 public consent, resulted in CnES consent to Arnish Hub). Democratic?

13.4 Conclusion: The Requirement for Peace and Preservation

The community's objective is the preservation of their homes and the natural environment to which they are intrinsically connected. To allow the N4 development to proceed, in the face of such comprehensive local opposition and ecological risk, would be a failure of both democratic governance and environmental stewardship. We call for the protection of this vulnerable region from an unsustainable industrial future.

14. Governance Failures, Democratic Overrule, and the Requirement for Strategic Planning

14.1 Institutional Failure and the Adoption of N4

Comhairle nan Eilean Siar (CnES) has failed in its duty to represent its constituents by neglecting to alert the Scottish Government to the significant and growing community opposition to the N4/Spiorad na Mara project. By withholding or failing to share these substantive objections, the local authority allowed the project to progress to formal "Adoption" based on a foundation of misinformation. This erroneous adoption has forced an unwanted industrial presence upon a resistant community.

14.2 Comparative Analysis: The Shetland Experience

Both the Shetland Islands Council (SIC) and CnES have historically misrepresented community sentiment regarding large-scale renewable developments. The experience on Shetland serves as a cautionary example:

- **The Viking Energy Precedent:** Similar to the proposed Spiorad na Mara project, the Viking Energy windfarm—while situated on land—is functionally an offshore project due to its reliance on subsea cabling for export.

- **Exploitation vs. Benefit:** These projects position island communities as "exploited hosts" rather than beneficiaries, with the energy produced intended solely for export to the mainland.
- **Long-term Social Harm:** Shetland has endured over two decades of unplanned industrialization, resulting in significant social suffering. We maintain that repeating this "ruinous" model on the Isle of Lewis is irresponsible and avoidable.

14.3 Geographic Incompatibility and Administrative Transparency

The geographic placement of N4 is considered untenable. This burden is exacerbated by the knowledge that CnES had multiple opportunities to provide a transparent account of community opposition but chose to remain silent. Had the local authority acted with integrity, the N4 project should never have been adopted, sparing the community years of exhaustive and unnecessary stress.

14.4 The Necessity of a Strategic Moratorium

The current state of "unplanned renewable energy chaos" is unsustainable and damaging to the health and social fabric of the Hebrides. We call for an **immediate Moratorium on all renewable infrastructure** until the following conditions are met:

- **Cumulative Impact Assessment:** A full, honest, and transparent assessment of the combined impacts of all proposed and existing projects.
- **National Strategy Development:** The creation of a joined-up, democratic plan for a Renewables Industry in Scotland.
- **Public Consultation:** The meaningful involvement of Scottish communities in determining the future of their own lands and seas.

It is a failure of governance that an entire industry has been permitted to develop without a cohesive national strategy. In any other industrial sector, such a lack of planning would be considered a "grotesque error of judgment."

14.5 Democratic Erosion and the "Green Revolution"

The current "Green Revolution" has failed to deliver a just transition; instead, it has resulted in the systematic overthrow of public democracy in Scotland's rural communities. While there are over 5.4 million citizens in Scotland, they are represented (theoretically) by 129 MSPs: the interests of a small, affluent minority and their associated commercial entities are being prioritized over the majority voice from Scotland and its islands.

14.6 Conclusion: A Legacy for Future Generations

The opposition to Spiorad na Mara is not a rejection of progress, but a demand for appropriate, planned, and democratic development. We seek to protect the "unimaginable joy" and natural richness of our island so that our children may inherit an environment defined by ecological sensitivity rather than industrial violation. We must correct these "human follies" now to ensure a

future where nature and community are valued above unbridled resource consumption and private profit.

15. Accessibility of Environmental Assessments and Reporting

15.1 Barriers to Public Engagement

The current framework for environmental assessments and reporting presents significant barriers to meaningful public participation. The documents produced are frequently characterized by:

- **Excessive Length and Complexity:** The "over-sized" nature of these reports makes them inaccessible to the average citizen, requiring an unreasonable amount of time and effort to review.
- **Technical and Niche Language:** The use of specialized jargon creates a "linguistic barrier," effectively excluding the public majority from navigating the planning process and engaging in straightforward discourse.
- **Administrative Burden:** Attempting to respond to these complex documents is physically and mentally exhausting for community members, resulting in an "engagement gap" that undermines democratic transparency.

15.2 Deficiencies in Decision-Making Frameworks

There is a profound concern that decision-making at the ministerial and governmental levels has become overly reductive. Rather than engaging in a balanced assessment of local impacts, representatives often rely on standardized "party-line" justifications, such as "reaching Net Zero" or the project being of "National Significance." This approach is viewed as irresponsible, as it prioritizes high-level (man-made) targets over the nuanced, area-specific facts required for ethical and sustainable governance.

15.3 Ethical Attrition within Government

The perceived lack of integrity within the planning process has led to the voluntary resignation of officials (in Scotland) who find themselves morally unable to reconcile local realities with mandated national targets. This loss of experienced personnel highlights a systemic crisis:

- **Target-Driven Bias:** The pressure to meet quotas at any cost is driving out individuals who value objective, balanced decision-making.
- **Growing Public Dissatisfaction:** These resignations are supported by a substantial movement of an estimated 80,000-plus community residents across Scotland who seek a return to morally sound and representative governance.

15.4 Impact of Early Exclusion

The exhaustive and "damning" workload currently placed on the community could have been avoided if genuine community opinion regarding N4 had been integrated into the process at its inception. The failure to consult at the earliest stage has resulted in a wasteful and stressful and

therefore unsustainable process that serves neither the public interest nor the efficiency of the planning system.

15.5 Conclusion: The Need for Transparent Communication

For the planning process to be considered legitimate, it must transition away from "bulldozing" local interests through complex documentation. A responsible government must ensure that environmental reports are truly publicly accessible—not merely available, but comprehensible—to ensure that those most affected by a project have a fair opportunity to influence its outcome.

16. Habitat Preservation and Ecosystem Integrity

16.1 Industrial Impacts on Biodiversity

To ensure the survival of indigenous wild species, it is imperative to protect them from the compounding industrial damages caused by an unplanned and unregulated renewable energy industry. Current data indicates that the rapid expansion of renewable developments is leading to the systematic destruction of critical habitats and ecosystems, resulting in a drastic decline in species populations across multiple taxa.

16.2 Empirical Evidence of Species Decline

The decline in biodiversity is supported by longitudinal ecological studies. For example, research conducted over a ten-year period (e.g., in Denmark) utilized specialized monitoring techniques—such as standardized counts of insect remains on vehicle windscreens—to quantify biomass loss. These studies have confirmed a significant and tragic reduction in insect populations, which serve as the fundamental base for broader food webs. Such findings underscore the reality of widespread ecological thinning that often goes overlooked in high-level industrial assessments.

16.3 Cumulative Regional Pressure

The recent authorization of large-scale offshore wind developments in the waters between Ireland and Scotland represents a significant increase in regional environmental pressure. Given the scale of these existing projects, there is a strong argument that no further "consents-to-damage" should be issued. The cumulative impact of these projects may already exceed the carrying capacity of the local marine environment. **The Saturation Threshold (2025).**

16.4 The Case for a Strategic Moratorium

An immediate moratorium on further offshore development is essential to preserve the possibility of a sustainable future for Scotland. We must protect the seabed from further industrialization until a realistic, comprehensive, and scientifically sound assessment of cumulative impacts is completed. **The 2025 Seabed Protection Directive: re preserving carbon stored in the seabed.**

16.5 Marine Environments as Essential Infrastructure

Our seas should be recognized as "natural infrastructure" of national significance. They are not merely sites for industrial utility; they are vital systems that:

- **Regulate Climate:** Serving as essential carbon sinks and thermal regulators.
- **Secure Food Systems:** Supporting the fisheries that provide national food security.
- **Sustain Communities:** Maintaining the socio-economic and cultural foundations of coastal populations.

16.6 Conclusion: Ending Reactive Decision-Making

The Scottish Government must cease taking "rushed chances" with the well-being of its citizens and the health of its environment. A shift from reactive, target-driven industrialization to a precautionary, ecosystem-based management approach is required to prevent the total collapse of Hebridean habitats.

17. Socio-Economic Factors and the Industrial Framework

17.1 Macro-Economic Energy Policy and Emissions

Current government energy policy has created a paradoxical industrial environment. While Scotland has historically been a low-emitting nation, excessive energy costs are contributing to the decline of domestic industry. This forces an increased reliance on imported goods, essentially shifting the carbon footprint to other nations. Since imported emissions are frequently omitted from national records, the actual global environmental impact is obscured despite the shared nature of the atmosphere.

17.2 Supply Chain and Labor Exploitation

The globalized nature of the **offshore wind** supply chain introduces significant ethical and environmental concerns:

- **Manufacturing and Transport:** Sourcing turbines from nations with low labour costs (e.g., Indonesia) increases transport-related emissions and relies on questionable and unsustainable labour practices.
- **Maritime Labor:** There are genuine reports of seafarers and migrant workers in the North Sea offshore sector working 12-hour shifts for less than the minimum wage.
- **Safety and Maintenance:** Cost-cutting measures have been linked to a decrease in infrastructure maintenance. This has resulted in fatal offshore accidents which the Supreme Court has noted 'were avoidable', calling into question the purported "benefits" of the current industrial model.

17.3 Fiscal Policy: CfDs, Constraint Payments, and CPPAs

The financial framework supporting renewable energy is heavily weighted in favour of developers at the expense of the public:

- **Contracts for Difference (CfD):** This mechanism provides a risk-free income stream for developers, incentivizing rapid, often unplanned, construction.

- **Constraint Payments:** Significant public funds are used to pay companies *not* to produce energy when the grid lacks capacity (e.g., Viking Energy on Shetland and Moray East in the North Sea). Too many windfarms 'rushed through' too fast. Private-profit being the only reason.
- **Corporate Power Purchase Agreements (CPPAs):** Energy production (subsidized by public taxes and excessive electricity bills) is frequently sold directly to large corporations through CPPAs. This means the public pays to subsidize power that they cannot then access at a fair rate.

17.4 Local Socio-Economic Impact of N4

The Spiorad na Mara (N4) project is viewed not as a community benefit, but as a socio-economic threat: a community disbenefit.

- **Export-Only Model:** The power generated is intended purely for export, providing no direct energy security to the Isle of Lewis.
- **Labor Displacement:** The promised "local jobs" often manifest as temporary infrastructure worker camps that fail to integrate with or uplift the permanent community.
- **Exploitation of Knowledge:** Public consultation is perceived as a data-mining exercise where community knowledge is manipulated to favour the developer's interests.

17.5 The Conflict of Power: Unilateral vs. Community

The relationship between the developer (Northland Power) and the community is characterized by a "Unilateral Power" dynamic—a top-down, coercive force that disregards local agency. This stands in stark contrast to "Community Power," which is pastoral, interactive, and based on mutual thriving. The imposition of industrial projects against the majority will is seen as a violation of civil rights and a form of "tyranny" that leads to social decay.

17.6 Disconnection and Ecological Risk

There is a fundamental "void" between the developers and the residents. The community possesses an intimate, durable connection to the environment, while the developer prioritizes access, influence, and legal manipulation to bypass local accountability. This disconnect allows for the proposal of projects in "The Wrong Place," directly contradicting the protective spirit of National Planning Framework 4 (NPF4).

17.7 Conclusion: The Irreplaceability of the Hebridean Way of Life

The intense community anguish surrounding this application stems from the realization that a way of life on a "unique and sacred Isle" cannot be mitigated. The suggestion that financial compensation or technical mitigation can offset the loss of a culture and its environment confirms that the developers are aware of the irreversible damage their proposal entails. We maintain that the N4 project is a "grotesque error" that must be rejected to preserve the integrity of the Isle of Lewis.

18. Nature Conservation and Marine Protected Areas (MPAs)

18.1 Strengthening Regulatory Oversight of MPAs

The mere designation of a Marine Protected Area (MPA) is insufficient without active supervision and enforcement. Currently, nature protections do not appear to receive the rigorous deliberation required to maintain their ecological integrity. For conservation to be meaningful, the Scottish Government must provide the support necessary to ensure that industrial activities do not contradict the specific conservation objectives of these protected zones.

18.2 Visibility of Seabed Degradation

Public awareness regarding the destruction of the seabed remains limited, often because the realities of industrial seafloor damage are omitted from mainstream media due to their distressing nature. While the impacts of bottom-trawling are beginning to be acknowledged, the "industrial carnage" associated with offshore wind (OSW) remains largely hidden from public view. This includes:

- **Physical Destruction:** The installation of massive, heavy anchorage systems for turbines.
- **Trenching:** The excavation of extensive, deep trenches across miles of the seabed for industrial cabling.
- **Sedimentation:** Evidence from the North Sea indicates that such activities transform vibrant habitats into "thick, gloopy sludge," resulting in the permanent collapse of natural seabed infrastructure.

18.3 Impact of Electromagnetic Cabling

Beyond physical disruption, the deployment of massive electromagnetic cabling networks is detrimental to marine ecosystems. These subsea transmission lines interfere with the biological processes of sea life, further contributing to a "dying picture" of the offshore wind industry. Currently, the primary beneficiaries of this environmental degradation are developers and shareholders, rather than the environment or the public.

18.4 Due Diligence and the Adoption of Targets

The push to meet arbitrary renewable energy targets often bypasses the necessary due diligence required for responsible planning. When a target is used as the primary justification for awarding consent—as is feared with the N4/Spiorad na Mara application—it suggests a failure in the regulatory process. Such failures may indicate:

- **Inadequate EIA Review:** A lack of thorough examination of Environmental Impact Assessments.
- **Deficient Reporting:** EIAs that fail to account for cumulative or community-specific impacts.
- **Irrational Decision-Making:** The appointment of representatives who prioritize political quotas over ecological and social responsibility.

18.5 Redundancy of Large-Scale Infrastructure

Scotland's current renewable energy production already exceeds its domestic demand. Consequently, the development of expensive, ecologically damaging, and visually intrusive cabling networks is unnecessary. The socioeconomic and environmental cost to the consumer and the Hebridean environment cannot be justified when the energy produced is purely for export and the "natural infrastructure" of our seas is being sacrificed in the process.

18.6 Conclusion: Objection: followed by The Requirement for a continued Moratorium

The ongoing exploitation of the seabed for private profit necessitates an immediate strategic pause. We call for a **Moratorium on all offshore renewable infrastructure** to allow for a comprehensive and knowledgeable assessment of the state of our marine environments. The Scottish Government must stop the practice of "rushed chances" and prioritize the conservation of the vital marine systems that regulate our climate and sustain our coastal communities.

19. Sustainability and the Requirement for Reassessment

19.1 Incompatibility of Current Industrial Models

The current trajectory of renewable energy (RE) industrialization is fundamentally inappropriate for the Isle of Lewis. The project, in its present form, fails to align with the ecological, social, and cultural requirements for long-term sustainability. To prevent irreversible harm, it is imperative that the existing sustainability appraisal be subjected to a rigorous and independent reassessment.

19.2 The Prerequisite of a Strategic Moratorium

A meaningful reassessment cannot take place while development continues at its current pace. We call for an **immediate Moratorium on all renewable energy infrastructure** to facilitate the following:

- **Damage Assessment:** A comprehensive audit of the environmental and social impacts caused by existing developments across Scotland.
- **Strategic Stock-taking:** A pause to evaluate the national energy strategy and ensure it aligns with actual domestic needs rather than external commercial interests.
- **Evidence-Based Planning:** A transition from a reactive, target-driven approach to one based on established ecological limits and cumulative impact data.

19.3 Community-Led Governance and Inclusion

Sustainability is inextricably linked to democratic participation. Future planning must transition away from top-down technocratic mandates toward a model of "Scotland-wide inclusion." Communities possess an intimate, longitudinal knowledge of their specific environments; their involvement is essential to ensure the industry functions with:

- **Fairness:** Ensuring that rural communities are not exploited to subsidize urban or corporate energy needs.
- **Transparency:** Providing clear, accessible information regarding the true costs and benefits of industrial proposals. Benefits and disbenefits need inclusion and weighing in applications. We are traditionally seeing 'developer suggested benefits', but there is a lack of pairing with

Community /public disbenefits. That forms an irrational Application. And is exacerbated by 'salami-slicing' of developments to 'lessen/narrow' potential impacts.

- **Democratic Accountability:** Restoring the agency of local populations to determine the future of their own lands and seas.

19.4 Optimizing Community Benefit

True sustainability is achieved when developments provide the "greatest and richest" benefits to the communities that host them. By involving local residents as primary stakeholders from the outset, the industry can move away from coercive practices and toward a model that respects the "Sense of Place" while fostering genuine socio-economic resilience.

Community Wealth Building (Act of 2025)

The Community Wealth Building (Scotland) Act 2025 is now law. It mandates that developers do not just 'offer a fund' but must provide 'direct equity or ownership options' to the community.

'Extractive capital' see point 4.4 is now supported by this specific Act.

19.5 Conclusion

The current "rushed" process is leading to "grotesque errors of judgment." A planned, democratic, and community-inclusive way forward is the only means of ensuring that the Isle of Lewis—a "unique and sacred island of pastoral communities"—is preserved for future generations. We must prioritize the protection of our natural assets over unplanned industrial expansion.

20. Regional Locations and the Requirement for Strategic Oversight

20.1 The Necessity of a Strategic Moratorium

There is currently no viable path forward for renewable energy development in this region that does not result in excessive and irreversible damage to the Isle of Lewis and the wider Scottish landscape. To secure a healthy and sustainable future, an immediate moratorium on all renewable energy infrastructure is required. This pause is essential to conduct a comprehensive reassessment and to establish a cumulative, national plan for a sustainable industry that prioritizes long-term stability over rapid expansion.

20.2 Transparency and Cumulative Mapping

Effective planning requires full transparency regarding the scale of industrialization. Despite formal requests to Comhairle nan Eilean Siar (CnES) and its planning representatives, a cumulative map detailing the totality of proposed, considered, and operational renewable infrastructures on the island has not been provided. Communities have been requesting such mapping for almost a year.

The failure of government representatives to provide a clear, honest, and transparent overview of the total industrial pressure facing the island has placed an undue and growing burden on local communities. Had this information been disclosed at the outset, the current avoidable crisis of public trust and environmental risk might have been averted.

20.3 Ethical Governance vs. Technocratic Exploitation

The relationship between technocratic government bodies and power companies, towards local residents has become increasingly adversarial. Communities feel exploited as "leverage points" to facilitate industrial goals, regardless of local opposition. This top-down, unilateral approach to governance is considered unsustainable and ideologically polarizing. It represents a dominating power dynamic that seeks to achieve industrial targets irrespective of the social and cultural costs to the affected populations.

20.4 Unintended Consequences of Accelerated Development

The current industry trajectory is characterized by excessive haste and a narrow focus on commercial profitability. This unplanned process is prone to "grotesque errors of judgment" that worsen with every new proposal. For an island defined by its unique pastoral character, sacred traditions, and Sabbath observance, such expansive and rushed industrialization is fundamentally inappropriate. The unintended consequences of this project risk transforming a "sacred isle" into a case study of failed environmental and social policy.

20.5 Conclusion: The Preservation of the Isle of Lewis

The Isle of Lewis is not a suitable location for large-scale industrialization. The ecological and cultural risks posed by the N4/Spiorad na Mara project far outweigh any purported benefits. We must not sacrifice this unique landscape—a source of vital community joy—to the interests of a reckless and unplanned industrial expansion.

For the reasons detailed throughout this document, I maintain a formal and total objection to the Spiorad na Mara/N4 application.

Final Conclusion: Statutory Incompatibility and Environmental Preservation

In conclusion, the west side coastline of the Isle of Lewis is fundamentally unsuitable for large-scale industrialization of this magnitude. A comprehensive assessment of the N4/Spiorad na Mara proposal demonstrates that the projected ecological and socio-cultural risks far exceed any purported national or economic benefits. This objection is not merely a statement of local preference; it is a formal challenge based on fundamental failures in **statutory compliance**.

As evidenced throughout this representation, the project fails to align with the core mandates of the **Scottish National Planning Framework 4 (NPF4)**, the **Marine (Scotland) Act 2010**, and the **National Islands Plan**. The proposed development represents a departure from the "Just Transition" principles established by the Scottish Government, as it seeks to impose an extractive industrial model upon a unique landscape that serves as both a nationally significant ecological sanctuary and a vital cultural asset.

POLICY TEST SUMMARY

The following summary evaluates the N4/Spiorad na Mara project against mandatory Scottish Government policy thresholds. In the planning hierarchy, these tests represent the minimum requirements for project viability:

- **Biodiversity Net Gain (NPF4 Policy 3):** Does the project demonstrably enhance biodiversity? **NO.**
- **Socio-Economic Acceptability (NPF4 Policy 11):** Are the impacts on the fishing industry and local economy "acceptable"? **NO.**
- **Procedural Integrity (Aarhus Convention):** Was community consultation authentic and transparent? **NO.**

Final Recommendation: Based on these fundamental policy failures, the proposal is contrary to the Development Plan and should be refused. To approve this application would be to endorse a "Disproportionate Transition" - one that prioritises unplanned industrial expansion over the documented rights of island communities and the preservation of irreplaceable natural heritage. Given the project's failure to meet the necessary policy tests for biodiversity enhancement, community wealth building, and authentic engagement, it is my personal, professional and community position that the application be refused.

Final Conclusion for Submission: Because the proposal fails these fundamental "Policy Tests" (please refer to Appendix A for details), it is contrary to the Scottish National Planning Framework and the National Islands Plan. Proceeding with this development would constitute a breach of the Scottish Ministers' statutory duties.

Therefore, this application must be refused.

Signed:



Date: 22 April 2026

Please continue to Appendix A1.

APPENDIX A: STATUTORY COMPLIANCE AND STRATEGIC POLICY ASSESSMENT

App A1. Assessment Methodology: The "Policy Test" Framework

I/we have included this section to move beyond just sharing our concerns and to hold the Scottish Government and the developers accountable to their own rules.

The **N4/Spiorad na Mara** project has to be evaluated against the framework of mandatory "Policy Tests." In accordance with the established Scottish planning hierarchy, industrial proposals must demonstrate alignment with high-level legislative requirements and national strategic objectives before site-specific consents can be considered.

The proposal must adhere to the fundamental principles of **National Planning Framework 4 (NPF4)**, the **National Islands Plan**, and international environmental obligations under the **Aarhus Convention**.

While the developers might use complicated language to make the project sound beneficial, we are using this section to show exactly where they are failing to meet the mandatory requirements for:

- **Protecting Nature:** Proving that they are damaging the sea rather than making it better.
- **Supporting Local People:** Showing that "community wealth" is being lost, not gained.
- **Honest Consultation:** Highlighting that the community has been ignored or misrepresented.

By including this "Policy Test" framework, we are making it clear to the decision-makers that if they approve this project, they are effectively breaking their own planning laws (**NPF4**), ignoring the **National Islands Plan**, and failing their international legal duties (**Aarhus Convention**).

We have taken the facts of what is happening here on Lewis and measured them against the government's official laws and promises. We aren't just saying "No"; we are showing that, legally, the government doesn't have the grounds to say "Yes."

App A2: Assessment against Mandatory Policy Tests:

The following sections detail the specific policy conflicts that necessitate the refusal of this application based on a failure to meet mandatory **threshold requirements** for biodiversity, community wealth building, and procedural transparency.

Biodiversity Test:

Does the Spiorad na Mara project enhance biodiversity as required by **NPF4 Policy 3**?

NO

- **The Rule:** Under **NPF4 Policy 3**, the Scottish Government has moved beyond "mitigation" (minimising harm). The law now requires that all major development proposals must contribute to the **enhancement of biodiversity**, ensuring that the natural environment is left in a demonstrably better state than it was before the project began.
- **Threshold:** To pass this test, a development must deliver a "**Significant Positive Effect**" and facilitate the restoration of degraded ecosystems. Proposals that result in a net loss of biodiversity or facilitate the fragmentation of habitats are to be refused under Policy 3(b).
- **Result: FAILED** The N4/Spiorad na Mara project fails this threshold entirely. The documented projection of **140 tonnes of toxic chemical discharge** (specifically PFAS "forever chemicals" from leading-edge erosion) combined with the physical destruction of the seabed through cable trenching represents **net ecological degradation**. These activities do not enhance the environment; they introduce persistent toxins and destroy critical habitats for slow-growing marine life. As the project causes irreversible harm rather than a "positive effect," it is fundamentally incompatible with NPF4.

Economic Test:

Are the impacts on the fishing community and local economy "acceptable" under **NPF4 Policy 11**?

NO

- **The Rule:** Under **NPF4 Policy 11(e)**, renewable energy projects are only supported if the developer can demonstrate that the impacts on communities and economy - including **commercial interests** - are "acceptable." This policy requires a balance where green energy goals do not automatically override the survival of existing local industries.
- **Threshold:** The development must prove that it does not cause significant or irreparable harm to the local economy. Specifically, it must show that any "spatial squeeze" (the loss of physical space for other sea users) does not threaten the viability of the multi-generational fishing industry or the community wealth it supports.
- **Result: FAILED** The N4/Spiorad na Mara project creates an unprecedented "spatial squeeze" that effectively displaces the Isle of Lewis's fishing fleet from its traditional, most productive grounds.

This is not an "acceptable" impact; it is a catastrophic socio-economic loss. By prioritizing industrial energy export over a self-sustaining local food industry, the project contradicts the core requirement of Policy 11 and represents an unacceptable cost to the island's economic resilience.

Democratic Test:

Was the community consultation authentic, transparent, and compliant with the **Aarhus Convention**?

NO

- **The Rule:** The **Aarhus Convention** (to which the UK and Scotland are signatories) grants the public the right to participate in environmental decision-making. Specifically, the law requires that authorities provide all relevant information and that public participation must occur at an "early stage" when all options are still open. Most importantly, it requires that the outcomes of the consultation be taken into "due account."
- **Threshold:** Public participation must be **authentic** and **transparent**. It is not a "box-ticking" exercise; it mandates that the true sentiment and evidence provided by the community are accurately represented in the final decision-making reports.
- **Result: FAILED** The consultation process for N4/Spiorad na Mara constitutes a fundamental procedural error. Reporting that the community was "happy" while residents were in profound distress—and while formal objections were being systematically raised—is a direct misrepresentation of public sentiment. By failing to accurately report the community's opposition to the Sectoral Marine Plan (SMP-OWE), the authorities have breached the "Participation" pillar of the Aarhus Convention, rendering the consultation process legally flawed.

Resilience Test:

Does the Spiorad na Mara project support island resilience and sustainability under the **National Islands Plan**?

NO

- **The Rule:** The **Islands (Scotland) Act 2018** and the **National Islands Plan** require the Scottish Government to "Island Proof" all major policies and projects. This means ensuring that developments do not disadvantage island communities and actively work to support their unique social, economic, and cultural identities.
- **Threshold:** Development must facilitate "Island Proofing" by protecting the local environment, supporting community-led economic growth, and—crucially—preventing forced depopulation by maintaining the island's viability as a place to live and work.
- **Result: FAILED** The project represents a fundamental failure of the Resilience Test. Rather than supporting the community, the proposal triggers social fragmentation, documented mental health issues, and the destruction of the local fishing economy. By undermining the primary industries and the well-being of the residents, the project creates the exact conditions for depopulation that the National Islands Plan was designed to prevent.

Natural Heritage Test:

Does the Spiorad na Mara project protect natural assets and ecosystem integrity as required by **NPF4 Policy 4**?

NO

- **The Rule:** NPF4 Policy 4 protects Scotland's natural assets and prohibits development that would have an unacceptable impact on the integrity of an ecosystem or the character of a protected landscape.
- **Threshold:** Development must demonstrate that it will not compromise the "Favourable Conservation Status" of species or the overall health of the marine environment.
- **Result: FAILED.** The West Coast of Lewis is a pristine "natural asset" of national importance. The documented cetacean mortality linked to industrial activity and the permanent disruption of vital lobster grounds represent a direct compromise of ecosystem integrity (Policy 4a). The impacts are objectively "unacceptable."

Community Wealth Test: NPF4 Policy 25

Does the Spiorad na Mara project contribute to local economic retention and community wealth building as required by **NPF4 Policy 25**?

NO

- **The Rule:** NPF4 Policy 25 mandates that developers show how their project will contribute to the local economy and support community-led initiatives through "Community Wealth Building."
- **Threshold:** Proposals must prioritize local economic retention and ensure that the value generated by the development benefits the people living in the immediate area.
- **Result: FAILED.** N4 is an export-only industrial model. It restricts local micro-generation, threatens existing small-scale industries (fisheries), and prioritizes "Extractive Capital" (profits leaving the island) over local wealth. It serves as a barrier to community resilience rather than a catalyst for it.

Marine Sustainability Test: Marine (Scotland) Act 2010

Does the Spiorad na Mara project fulfill the statutory duty to protect and enhance the health of the marine area under the **Marine (Scotland) Act 2010**?

NO

- **The Rule:** Section 3 of the Marine (Scotland) Act 2010 creates a statutory duty for Scottish Ministers to manage the sea in a way that protects and, where appropriate, enhances the health of the marine area.
- **Threshold:** The development must ensure that the sea remains "clean, healthy, safe, productive, and biologically diverse."
- **Result: FAILED.** The introduction of 140 tonnes of toxic PFAS and microplastics via Leading-Edge Erosion (LEE) over the project's 35-year life is a direct breach of the duty to keep the seas "clean and healthy." This discharge represents a long-term anthropogenic hazard incompatible with the Act.

Intergenerational Rights Test: UNCRC (Scotland) Act 2024

Does the Spiorad na Mara project respect the rights of children to a healthy environment and intergenerational justice under the **UNCRC (Scotland) Act 2024**?

NO

- **The Rule:** This Act requires all public authorities to act compatibly with the UN Convention on the Rights of the Child. Article 24 specifically protects a child's right to a healthy and safe environment.
- **Threshold:** Decisions made today must not compromise the environmental heritage or health of future generations (Intergenerational Justice).
- **Result: FAILED.** The introduction of persistent carcinogens into pristine waters violates the rights of the children of Lewis to inherit a clean, biologically diverse "Home." This constitutes a failure to uphold the statutory protections afforded under the 2024 Act.

Protected Species Test: Habitats Directive (92/43/EEC)

Does the Spiorad na Mara project maintain "strict protection" and **Favourable Conservation Status** for European Protected Species?

NO

- **The Rule:** This Directive requires "strict protection" for European Protected Species (EPS), including all whales, dolphins, and porpoises. Any "deliberate disturbance" during sensitive periods (breeding/migration) is prohibited.
- **Threshold:** Development must not cause the deterioration of breeding sites or resting places, nor can it disturb species in a way that affects their conservation status.
- **Result: FAILED.** The mass strandings and deaths of pilot whales occurring in conjunction with industrial surveys are evidence of a failure to maintain "Favourable Conservation Status." The project's acoustic and physical footprint represents a "deliberate disturbance" on a scale that cannot be mitigated within this sensitive migratory corridor.

APP 3: Policies relevant to Main Body sections:

Relevant statutory frameworks and national planning policies by section:

1. Location of Site and Key Considerations

1.1 – 1.4 Environmental and Ecological Policy Misalignment The environmental damage documented off Scotland's East Coast must not be replicated off the Isle of Lewis. This proposal fails to meet **NPF4 Policy 3**, which mandates that development must facilitate biodiversity enhancement. Furthermore, the "spatial squeeze" on local fisheries contradicts **Scotland's National Marine Plan (NMP) Policy FISHERIES 1**, protecting existing fishing opportunities. The application of the **Precautionary Principle** is required here, as the risk of irreversible damage to slow-growing corals and marine life is high.

1.5 – 1.6 Community Stewardship and Moratorium Request The trajectory of industrialization threatens the multi-generational stewardship of local communities. A formal moratorium is requested to allow for a transparent assessment of cumulative impacts, especially as current energy production already exceeds domestic consumption.

2. Analysis of Spiorad na Mara (N4)

2.1 – 2.2 The "Unjust Transition" The systematic exclusion of local populations represents a "Very Unjust Transition". This violates the **Scottish Government's Just Transition Principles**, which require fairness and inclusion in the shift to net zero. The project causes disempowerment and social fragmentation rather than meeting **NPF4 Policy 25** community wealth-building objectives.

2.3 – 2.4 Site Incompatibility and Policy Conflict Granting consent for industrial works during peak biological periods causes severe disruption to migratory species and violates the **Habitats Directive (92/43/EEC)**. Under **NPF4 Policy 4**, which emphasizes the protection of natural heritage, there is clear policy support for rejecting this application in such an ecologically sensitive area.

3. Mitigations and Consultation Validity

3.1 – 3.4 Misrepresentation and Social Impact Mitigation is viewed as insufficient for a site that is fundamentally unsuitable. The reporting that the community was "happy about N4" was factually incorrect and misleading. Such misrepresentation breaches the **Aarhus Convention**, which mandates authentic public participation in environmental decision-making.

4. Economic Impacts and Alternative Models

4.1 – 4.5 Economic Injustice and Grid Barriers The current model contributes to energy poverty while prioritizing industrial export. This contradicts the community-wealth-building principles of **NPF4 Policy 25**. Furthermore, reserving grid capacity exclusively for large-scale projects prevents communities from pursuing their own sustainable micro-generation, violating the **National Islands Plan** objective of increasing community resilience.

5 – 7. Mitigation Feasibility and Governance

5.1 – 6.5 Failure of Due Diligence Mitigation is not possible because N4 does not meet site-suitability criteria. The lack of a strategic cumulative plan has led to chaotic development. The exclusion of local ecological knowledge regarding lobster grounds and spawning areas represents a failure of diligence in the **Environmental Impact Assessment (EIA)** process.

7.1 – 7.4 Regulatory Oversight A "one-size-fits-all" approach to the **Sectoral Marine Plan (SMP-OWE)** is incompatible with the diverse needs of Lewis. Marine Scotland is failing its mandate to protect habitats by prioritizing industrial targets over conservation.

8. Cumulative Evidence and Long-Term Hazards

8.1 – 8.3 Disruption of Marine Rhythms and Heritage Artificial light pollution disrupts biological rhythms and destroys the unique dark skies of the West Coast. This constitutes a loss of natural heritage protected under **NPF4 Policy 7 (Historic Assets and Places)**.

8.4 – 8.6 Chemical Pollution (PFAS) Leading-edge erosion will release an estimated 140 tonnes of toxic PFAS and microplastics over the project's life. This catastrophic pollution risk is incompatible with the **Marine (Scotland) Act 2010** goal of achieving "clean, healthy, safe, productive and biologically diverse oceans".

9 – 13. Rights, Health, and Regional Preservation

9.1 – 10.6 Human and Children's Rights The exclusion of residents has caused a documented mental health emergency. Furthermore, the project threatens intergenerational justice , violating the **UN Convention on the Rights of the Child (UNCRC)** as incorporated into Scottish Law.

11.1 – 13.4 Regional Ecological Failure The N4 proposal represents an unacceptable pollution threat to a vulnerable marine ecosystem. The failure of **Comhairle nan Eilean Siar (CnES)** to represent community opposition suggests a systemic bias that undermines local democracy.

14 – 17. Socio-Economic and Industrial Frameworks

14.1 – 15.5 Accessibility and Accountability The framework for environmental reporting is overly complex and inaccessible, creating an "engagement gap". Decision-making has become reductive, relying on "party-line" justifications rather than local, area-specific facts.

16.1 – 17.7 Biodiversity and Fiscal Policy The rapid expansion of renewables is destroying critical habitats. Fiscal policies like **Contracts for Difference (CfDs)** and **Constraint Payments** benefit developers at the public's expense. This industrial model is a "grotesque error" that must be rejected to preserve the Isle of Lewis.

APP 4: Weighting and the Precautionary Principle

In accordance with established planning standards, the **Precautionary Principle** must be applied to the N4 application. Where a conflict exists between "Renewable Energy Targets" and the "Protection of Biodiversity and Community Resilience" within NPF4, the latter must be given significant weight. Where there is a risk of significant or irreversible damage, the lack of full scientific certainty by the developer should not be used as a reason for proceeding. The evidence of ecological thinning and industrial harm is sufficient to mandate a refusal of consent, any approval would constitute a failure to protect the environment and the people of the Outer Hebrides.

Conclusion for Submission

Because the **Spiorad na Mara (N4)** proposal fails every core "Policy Test" listed above, it is fundamentally contrary to the **Scottish National Planning Framework 4 (NPF4)** and the **National Islands Plan**. The developer has failed to demonstrate biodiversity enhancement, has failed to secure community consent through transparent consultation, and has failed to prove that the social and ecological costs are "acceptable." Therefore, in accordance with the **Precautionary Principle** and the **statutory duties of the Scottish Ministers**, this application for consent must be **refused**.

Please refer to the Following Three Appendices: Appendix B, Appendix C and Appendix D which further Support Refusal of this application.

Appendix B.

Further specific points relevant to my objection to Spiorad na Mara.

The 2008 precedent and modern Statutory duty (AMEC 2008)

- **Material Precedent (AMEC 2008):** The 2008 ministerial refusal of The Lewis Windpower 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 material lack of terrestrial data, social impact evidence and nocturnal studies, the Marine Directorate should refuse consent on the grounds of an incomplete and legally deficient evidence base.

Machair protection: NPF4 Policy 3

The failure to assess impacts on irreplaceable machair habitats, described as 'scrubland' by Northland Power, at the landfall site constitutes a direct breach of **NPF4 policy 3**.

Onshore Infrastructure and Peatland: NPF4 Policy 5

Failure of Carbon sequestration: 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.

There has been an omission of Lighting Assessment: NPF4 Policy 4

There is a total omission of Lighting Impact Assessment regarding the high-intensity red aviation lighting.

Phototaxis and mortality: the developer has failed to assess the 'deadly-lure' effect on nocturnal species (Manx Shearwater, Storm Petrel) and the night-foraging habits of Kittiwakes. This creates 'reasonable scientific doubt' mandating refusal under The Precautionary Principle.

Social Impact and Health: NPF4 Policy 14

SIA is a material omission. The applicant has failed to publish full results of the commissioned SIA. This 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 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.

Appendix C

Summary of further, and elaborated, objection points being in fundamental conflict with NPF4

Spatial Planning failure:

The site is described as being in the ‘**wrong place**’ – an outlier, too close to shore.

Landscape and visual impact:

Scale and proximity of turbines threatens ‘Sense of Place’, scenic coastal character and local economy (tourism, arts, culture).

Cumulative Effects:

Application fails to account for the total impact of both offshore and onshore infrastructure (cabling, substations, further subsea cabling to mainland Scotland) on peatlands and rural road networks. Salami-slicing effectively removes this application from its ability to export power to its intended destination: England.

Environmental Concerns:

There is a lack of robust baseline data regarding marine mammals and biodiversity. The proposal relies on ‘mitigation’ rather than ‘positive enhancement’ required by policy 3.

Social & Economic harm: The project threatens traditional industries like crofting and fishing. The consultation process is experienced as ‘unilateral’ and ‘extractive’ which results in alienation, polarisation and distress of communities.

Procedural Flaws: By salami-slicing (separating turbines from grid-connection) the developer has submitted a fundamentally flawed Environmental Impact Assessment. This is irrational and irresponsible. And is described as such by supreme court judgements.

Spiorad na Mara is no Spirit of Our Sea. This Location is the Wrong Place in Every Respect.

Appendix D

Document: ‘Offshore Windfarms as a Growing Source of Toxic chemical Pollution’.

From Mrs Janet McNaughton BVM&S MRCVS

5 Geshader, Uig, Isle of Lewis, HS2 9HL, dated 2/05/2026

Part of submission document in Objection to Spiorad na Mara OSW farm, Isle of Lewis.

The Environmental Audit Committee launched its inquiry into Environmental PFAS on 10 April 2025.

There are very real concerns regarding an active threat of an ongoing and increasing source of the release of toxic chemical pollution (PFAS and 'forever chemicals' generally) into our environment.

Offshore windfarms as a Growing Source of Toxic Chemical Pollution: EAC Submission 23.07.2025

Inquiry into PFAs – Forever Chemicals in our Environment

A critical, yet under-addressed issue, is the toxic chemical pollution resulting from Wind Turbine Blade Erosion, and especially offshore and increasingly spreading to surround much of the UK, with the North sea particularly industrialised and therefore at risk. There is a particular interest in toxic turbine-blade erosion now spreading with RE industry to the **protected** west coast of Scotland's Outer Hebrides. **N4 is sited just 3 miles off shore. It covers a 50 sq. mile array.**

In the Highlands and Islands we have recently started calling for a pause (moratorium) on renewables infrastructure development until the real risks of damages and pollution can be fully assessed.

Relative to our Island, the **west coast of Lewis has been surveyed and classified** as a Particularly Sensitive Sea Area with an Exceptionally High Degree of Naturalness. **Consequent to this the shipping lane is located 12 miles west of our western shores. This was to protect our highly vulnerable environment from pollution incidents at sea.**

Today, the seas surrounding Scotland and its Islands are filling with offshore windfarms (OSW). These seas are **particularly harsh environments** resulting in highly significant levels of erosion of turbine blade coatings. Blade coatings contain epoxies and resins etc from which bisphenols and PFAS along with nano and microplastics are released into the environment.

Micro and nano plastics are excellent carriers of toxic forever chemicals due to their large surface area and strong hydrophobicity, which enables them to hold onto toxic chemicals in sea water. I also understand that remediation and monitoring of this recognised source of toxic chemical pollution (and its effect on species both in the sea, and therefore in seafoods, and in birds) are extremely expensive endeavours.

I send this evidence due to the extreme persistence of these toxic chemicals in the environment and their far-reaching impacts: including also the impacts on human recreational activities at sea, private fishing (another source of sea foods reaching the public), local indigenous communities source of food and as a way of life.

The financial burden of this source of OSW toxic pollution could be a case of 'the polluter pays' principle. But surely far better to have looked into this as a precaution, prior to even considering consent, for an environmentally inappropriate and unsuitable location/area. Looking at this in the very first instance, when the proposal is just an idea, could therefore avoid the long drawn-out, time-consuming and highly frustrating and extremely expensive process.

And as our government removes much scoping from the planning process, to speed it up, we could avoid the ever-increasing rush of damaging developments that are being, very unwisely, consented by quoting irrational targets, rather than being based on evidence of suitability of site-location.

As it stands the Power company and Government are allowing and encouraging this extensive toxic chemical pollution, to spread wildly at sea. This is a worst-case scenario of the renewables industry. Please remember that this is closely associated with the micro and nano-plastic pollution which is filling our seas and therefore those who use and rely on our seas. Forever chemicals are now being found in birds eggs off Scotland's East coast. The North Sea is spatially congested with OSW. We want to avoid this happening on our West coast.

A Call for Action and Inclusion

The case for onshore windfarms can be similar in highly exposed on-land proposals, such as on Jersey, where PFA pollution has been severe. Where there is lots of rain and wind there is lots of wind power. But where there is lots of wind, rain, sand, salt, shell-fragments and even particulate pollution from disturbing industrial activity at sea, there is an extremely impactful level of the harsh reality of exposure and consequent excessive blade erosion at sea.

Blade erosion pollution is spread by wind, tides and currents, storms and hurricane-force swells. It accumulates and spreads at sea, but in onshore winds and storms this pollution spreads to coastal communities, our food sources of livestock and vegetable growth, and our community water sources. The impact of toxic chemical pollution from offshore windfarms, especially those too close to shore and coastal community, are feared and dreaded and an unbearable threat. Scotland's coasts and seascapes are generally highly rural and highly natural and therefore highly vulnerable to the effects of this air and sea spread of significant toxic chemical pollution.

There is much awareness of the human illnesses associated with toxic chemical pollution. These are also now found in sealife and birdlife. This is a cause of total species decline. For example: a female killer whale found dead on a Tiree beach (Inner Hebrides) was found on post mortem to have one of the highest concentrations of toxic chemical pollutants (PCBs in this particular case) ever recorded: 1000 mg/kg (yes, that does say one thousand); 10mg/kg would have been serious.

This is an example to illustrate the fact that something we did over many years is contributing to the loss of this species. There are only two male killer whales now left in this Hebridean Pod. This case was the last female, and she had not had a calf for 30 years: such PCB toxic chemical poisoning can act as a hormone suppressant, which prevents her ovaries from functioning and would prevent a female from being able to become pregnant. PCBs are highly toxic to cetaceans.

This is a warning to us - now.

The renewables industry, as it stands, is allowing this to happen to our seas and it is coming back to haunt us. Species such as whales are the top of the significant food web of the sea. Our Tiree whale had fed on smaller forms of sealife and all their chemical contaminants had accumulated in her (top of the food chain) body; killing her and ultimately the whole of that killer whale population.

Being at the top of the ocean food chain, the fortunes of whales and dolphins dictate the fortunes of the rest of the marine ecosystem. They are good indicators of the health of the ecosystem and the

state of the marine environment. We are seeing a year-on-year increase in whale and dolphin strandings and deaths. This should be telling us all to worry. Anthropogenic activities need to be urgently analysed. Local communities in Scotland are calling for this to happen. We can see what is happening. It might be useful if communities were involved in this industry as we know our lands and seas and are connected to them. This connection allows us to care for our seas; to protect them.

This toxic chemical pollution from erosion of OSW turbine blades demands attention. PFAs are in flame retardants, electronic chemicals, turbine blade surfaces. PFAs lead to both acute and chronic toxicity.

The spread of OSW intensive farming is creating a pandemic of unnoticed, but ubiquitous, toxic chemical pollution.

Scientists are aware of the UK weak approach to PFAs. Scottish communities are also very aware that there seems to be very little toxic chemical regulation here, despite known health harms. We are seeing the harms stranded and washed up on our beaches. Scotland has suffered decades of toxic chemical blade erosion. There seem to be no existing measures which are adequately protecting either public health or environmental health. Refusal of irresponsible consenting would be a start. Be guided by the Precautionary principle and NPF4.

Janet McNaughton.

Researchers from the International Monetary Fund relatively recently (2023) posed a simple question:

What is The Value of a Whale?

They considered total whale stocks, ecotourism and the billions of tonnes of CO2 they capture per year. More per pound than trees.

And if whales were conserved and regained pre-whaling population numbers, the IMF earnestly suggested INVESTMENT IN WHALE CONSERVATION over other carbon-capturing methods.

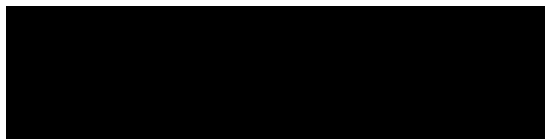
They estimated the cost of such conservation to be a modest £10 (\$13) per person on earth.

The value of a whale to you and me.

Money well spent.

This completes my full and Formal Objection to Spiorad na Mara Offshore Wind Application.

Date: 2 May 2026 Signature



From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Re; Objection to Spiorad na Mara Offshore Wind Farm - Isle Of Lewis
Date: 03 May 2026 17:21:00
Attachments: [Formal Objection Letter to the Spiorad na Mara Offshore Wind Farm application \(N4\)-](#) [REDACTED]
[REDACTED]

Dear Sir/Madam,

I am attaching my objection letter to the above.

Please confirm receipt.

Yours faithfully

[REDACTED]

Date: 3rd May 2026

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 Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment requirements. It is founded on a review of the Environmental Impact Assessment Report and related documents, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects.

The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale and design of the proposal, along with its proximity to the shore, raises serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

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

Furthermore, there are evident and substantial policy conflicts associated with the proposal. It appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and hinder the competent authority's ability to ascertain the development's acceptability from a policy standpoint.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a full, transparent, or reliable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty undermines the integrity of the assessment and hinders a consistent application of a worst-case scenario. Consequently, the impacts outlined may not correspond to the actual development, leaving both the public and the competent authority without a clear understanding of the true extent of environmental effects.

Consent is sought based on the reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach defers essential information to post-consent stages, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such procedural deficiencies contravene the intentions of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly established before any determination.

Moreover, there are critical evidential shortcomings, including gaps in baseline data and limitations in methodology, alongside a reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of impacts, particularly as conclusions of negligible or non-significant effects are presented without robust supporting data. The insufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is inconsistent with statutory requirements.

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

In conclusion, the combination of an undefined design envelope, the lack of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make a determination based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives, which does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their environmental effects, it merely outlines

the project's development history. This lack of analysis does not show that less harmful options have been properly identified and assessed in preference to more damaging solutions.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application is fundamentally flawed, particularly in its ornithological assessment, which contains significant gaps and internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. The proposed development is situated within key foraging areas and migratory pathways, yet the assessment fails to adequately evaluate the implications of displacement, collision risk, or habitat loss.

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

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

From a regulatory standpoint, the application does not meet the evidential threshold necessary to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and prevents

a lawful conclusion in support of consent. Furthermore, the identified deficiencies represent a failure to adhere to National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its distinct cultural identity that aligns with Indigenous characteristics, has not been included in a Free, Prior and Informed Consent process. This lack of meaningful engagement undermines the assessment's credibility and disregards established participation principles in decisions affecting cultural and environmental interests.

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

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

In summary, the failure to assess living heritage, intangible cultural value, community rights, and compliance with statutory obligations creates a significant evidential gap. The cultural impacts of the

development have not been thoroughly evaluated, and the application lacks a solid foundation for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

This lack of transparency also compromises the integrity of the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly when they could affect community character and functioning. The absence of the complete data set results in a failure to provide a thorough evidential basis necessary for weighing the benefits against the harms.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not properly represent the extent of change or the sensitivity of the surrounding environment. The coastline of

West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would establish a continuous industrial presence, significantly altering this character and leading to a permanent and irreversible change in the landscape.

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

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

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

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to disturb a wide area, adversely affecting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises

significant concerns, yet the application appears to minimise the importance of these effects without adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE: HIDDEN IMPACTS

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

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

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

From a policy standpoint, this omission is at odds with the National Planning Framework 4, which pertains to the safeguarding of natural areas and environmental quality. It also undermines the

overall analysis of landscape and seascape impacts, as the character of night-time environments is a vital component of the ecological setting.

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

TOURISM

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

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

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

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It stands in conflict with strategic goals that prioritise tourism as a vital growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the essential criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application revisits the fundamental issues that resulted in the 2008 refusal of the Lewis Wind

Power proposal, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal does not adequately address these critical concerns.

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

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

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

ADDITIONAL COMMENTS:

I believe the project is fundamentally flawed.

- The turbines themselves at 338 metres high will be amongst the largest, if not the largest anywhere in the world.
- The distance from our coastline is 6km to 13 km.

This is far closer than any other wind farm development of this size. The planned Talisk development is 35 km from the coast and will have fewer wind turbines with a maximum height of 280 metres.

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

There are many more planned projects non as close or as high as this project, including elsewhere in Europe, America and Asia.

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

Why should Lewis be the exception?

I am no NIMBY and I fully support the need for renewable energy to build a sustainable and resilient energy to combat climate change; but offshore wind turbines must be constructed the appropriate distance from our coastline.

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

Please stop or substantially alter the planned development by moving to smaller floating turbines much further offshore or an alternative location.

Yours faithfully,

[REDACTED]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 455B8868