

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Spiorad na Mara windfarm on Lewis Island, Scotland
Date: 05 May 2026 22:05:14

Dear Sir,

My name [REDACTED]

My address is [REDACTED].

I wish to strongly object to the proposed offshore windfarm project " Spiorad na Mara". Having spent the last 10 days walking the coast and moorlands overlooking the proposed site, I feel that this development would have a severely detrimental effect on the beautiful and ancient landscapes which draw so many of us to this special place.

The destruction of the peaceful marine horizons would destroy the essence of this beauty.

Yours faithfully,

[REDACTED]

Member of Public 2346

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Spiorad na Mara Offshore Wind Farm - Northwest of Lewis - 00011742 & 00011743
Date: 05 May 2026 21:43:04
Attachments: [N4 Objection - \[REDACTED\].docx](#)

Feasgar math dhuibh

Please see attached my **formal objection** to the N4 Spiorad na Mara planning application.

Could you please confirm you have recieved this and it has been recorded.

Mòran taing

Dùrachdan

[REDACTED]

Name: [REDACTED]

Full postal address: [REDACTED]

Email address: [REDACTED]

Date: 04/05/2026

Spiorad na Mara Offshore Wind Farm - Northwest of Lewis - 00011742 & 00011743

RE: FORMAL REPRESENTATION IN OPPOSITION

Spiorad na Mara Offshore Wind Farm – Section 36 Application, Electricity Act 1989

Dear Scottish Ministers,

I write to formally object to the application by Spiorad na Mara Limited to construct and operate an offshore wind farm off the west coast of the Isle of Lewis. I am a young Gael. Gàidhlig is my first language. I have two children (aged 1 & 3) and a husband and we have made our life here, staying true to the culture and way of life of this place. I set out my objection below across several grounds: environmental, cultural, economic, procedural, and personal. I ask that each ground be engaged with seriously.

I spent my childhood around a powerful, prolonged community campaign against AMEC's proposed large-scale onshore windfarm on Lewis. The community fought for years, against the developer, and against the Scottish Government, and ultimately won. If you are reading this and do not remember that campaign, I would urge you to research it. The development was also rejected because other more suitable alternatives were available, this is also the case now.

The community opposed that development for many reasons, but a central one was environmental. That outcome was right. It demonstrated that community opposition rooted in genuine environmental knowledge and sustained collective effort can and must prevail over commercial interest and government pressure. The same communities, the same landscape, and many of the same arguments are before Scottish Ministers again. I ask that the lessons of that campaign be taken seriously.

The Gaels of Lewis did not need research papers to understand the value of peat. They had been looking after this land for generations and knew its worth, ecologically, practically, spiritually. The communities of the Western Isles are not detached from nature in the way that people in urban centres often are. That connection is real, lived and longstanding.

Science has since caught up. Governments now acknowledge that peatland is an irreplaceable carbon sink, storing more CO2 per hectare than tropical rainforest. The Scottish Government has invested significantly in peatland restoration through Peatland ACTION. In my own village there are still people alive who remember living off this land before there were shops, before fruit and vegetables were transported from every corner of the earth. That is living memory. To protect the environment is to understand it, to nourish it, to live within your means, to source locally.

The proposed development would drive cables through miles of deep Lewis peat and construct a major substation at Stornoway on deep peat. This is the deliberate, large-scale destruction of an irreplaceable carbon store, the very thing Scotland's own climate policy requires to be protected and restored. It is also, I would submit, unlawful. There are legal protections against environmental destruction on this scale and they must be applied.

The Spiorad na Mara proposals do not protect the environment in any way, shape or form.

The proposed substation in Barvas is sited on machair, one of the rarest habitats in Europe, found almost exclusively along the Atlantic coasts of Scotland and Ireland, and supporting internationally important populations of breeding waders and other protected species.

The application characterises this habitat as "scrubland." That single word tells you everything about how this land, and the people who live on it, are regarded by this developer. It is not merely inaccurate, it reflects a fundamental failure to properly survey, understand or respect the ecological significance of what would be destroyed. I call upon Marine Directorate to commission fully independent ecological assessment of this site before any determination is made, and to apply the full weight of the legal protections that attach to machair habitat.

The waters off the west coast of Lewis support exceptional marine biodiversity, including cold-water coral reef ecosystems. These are among the most biodiverse and slowest-recovering marine habitats known to science, afforded protection under both Scottish and international law.

I formally request that Marine Directorate commission independent underwater survey and recording of the full seabed within and adjacent to the proposed development site before this application proceeds any further. It is the responsibility of the licensing authority to understand what would be destroyed. If the full extent of the marine life present in these waters were publicly known, I have no doubt it would be protected, and that a development proposed on top of it would provoke outrage across the world.

The Scottish Government cannot credibly claim to be meeting climate targets by approving a development that destroys miles of deep peat, builds substations on carbon-rich soils, exports all generated power south of the border through extensive new transmission infrastructure the length of Scotland, and obliterates irreplaceable marine and terrestrial habitats.

The Scottish Government is not asking its citizens to consume less, to source locally, or to make the structural changes that would genuinely address the climate crisis. Destroying pristine landscapes through mass industrialisation does not help the climate. It relocates and deepens the damage. The communities of the Western Isles have, for generations, lived in a way that is genuinely sustainable, connected to the land, dependent on local resources, respectful of ecological limits. That is not sentiment. It is a model. This proposal represents the opposite of that model. The Scottish Government would do well to send its decision makers here, to learn from a community that has lived sustainably on this land for generations, rather than imposing upon it.

Net zero cannot be achieved by destroying the natural systems that make it possible.

Every watt of power generated by this development will be transmitted south of the border. The people of Lewis will live with turbines dominating their horizon, cables through their peat, substations on their land, damage to their fishing grounds and the destruction of their seascape, and they will receive none of the electricity. The transmission infrastructure required to carry 900MW south will require significant new construction through communities and landscapes the length of Scotland.

This is not a contribution to Lewis's energy needs, nor to Scotland's. It is the extraction of a resource from one of Scotland's most vulnerable and peripheral communities, for the profit of a Canadian multinational that purchased the seabed lease for £16.1 million. There is no statutory mechanism compelling meaningful community benefit. There is no guarantee that Lewis sees a fair return.

Lewis communities already face the highest electricity costs in the United Kingdom. We generate large amounts of renewable energy on this island and see none of the benefit in our bills. We are now asked to accept the industrialisation of our coastline so that power can be exported south while we continue to pay the highest rates in the country. Scottish Ministers must weigh this asymmetry in full.

Scottish Ministers must be made aware of a deeply troubling statement made by Comhairle nan Eilean Siar, the local authority for the Western Isles, in their response to the Scottish Government's Sectoral Marine Plan for Offshore Wind Energy in 2020. The Comhairle stated:

"The local population has accepted the considerable visual impact of onshore deployment on the tacit understanding that the next generation of energy production will be in the marine environment. The local population is therefore prepared for, and supportive of, large scale deployment of offshore wind off Lewis and has not reacted negatively to the potential visual impact in the way other coastal regions in Scotland have."

This statement is **false**. When challenged directly on it, Comhairle nan Eilean Siar has been unable to produce a single piece of evidence to support the claim that the local population is prepared for or supportive of large scale offshore deployment. No survey was conducted. No community consultation underpins it. No mandate was ever sought or given.

This statement was made to Scottish Ministers as part of a formal planning process. It has been used to create the impression of community consent where none exists. It directly contradicts the evidence of widespread, sustained and vocal community opposition to this development, opposition that includes a large number of formal objections, community campaigns, and the personal representations of residents who are now considering leaving their homes as a direct consequence of this proposal.

I formally request that Scottish Ministers disregard the Comhairle's 2020 characterisation of community sentiment as evidence of support, and that they investigate how such an

unsupported and inaccurate claim came to be submitted as a material consideration in the planning process.

The N4 Spiorad na Mara application is not an isolated proposal. It is one of a significant number of large-scale renewable energy developments by foreign corporations that are simultaneously being planned, consented or developed on and around the Isle of Lewis. These include:

- Magnora Offshore Wind (Norway) — Talisk
- Eurowind Energy (Denmark) — Uisenis Wind Farm
- BAYWA R.E (Germany) — Druim Leathann
- RWE (Germany) — Grimshader and Heastabhal
- EDF and ESB (France and Ireland) — Lewis Wind Power
- Northland Power and ESB (Canada and Ireland) — Havbredey and Spiorad na Mara

Underpinning all of these is a proposed 1.8 gigawatt subsea interconnector with a High Voltage Direct Current converter station and 400kV AC substation near Stornoway, infrastructure of a scale that would transform the island permanently and irreversibly. Not one of these projects has been assessed in terms of its cumulative impact on the landscape, the environment, the community, the Gaelic language, or the island's population.

This mirrors concerns being raised across the Highlands. A Community Council Convention held in Beaulieu on 14 June 2025, supported by over 50 community councils representing more than 72,000 residents, called upon the Scottish Government to impose an immediate pause on major energy applications until their cumulative impact can be fully assessed. That call has not been answered. The application before Ministers today is being determined without any such assessment having taken place.

I formally request that this application not be determined until a full cumulative impact assessment has been carried out across all proposed and consented developments on Lewis and in the surrounding waters, and that this assessment addresses landscape, ecology, marine environment, community wellbeing, Gaelic language sustainability and depopulation risk.

I need to write plainly about what this proposal means for me, for my family and for this community.

As Gaels, the environment around us is woven into who we are. **Buinidh sinn don àite.** (We belong to this place.) This concept is not questioned when it comes to other indigenous peoples anywhere in the world. It does not seem to be widely accepted for Gaels. But it is true regardless of whether it is accepted. The land around me, my home, is connected to my soul. To have my surroundings transformed by this level of industrial destruction would be something I could not live with. The pain I feel even entertaining the idea is unbearable.

As a native Gael, Gàidhlig is not simply a language I speak, it is the lens through which I understand the world around me. The landscape, the coast, the peat, the sea, these are not backdrop to my life, they are woven into my identity, my culture and my mother tongue in

ways that cannot be separated. Gaelic placenames along the west side of Lewis are not labels on a map, they are descriptions, histories, relationships between people and land that have been maintained for over a thousand years. When that landscape is industrialised, those relationships are severed. The language loses its living context. This is recognised internationally as a form of cultural harm when it happens to indigenous peoples elsewhere in the world, yet Gaels are rarely afforded the same recognition. The UN Declaration on the Rights of Indigenous Peoples, to which the UK is a signatory, recognises the right of indigenous peoples to maintain their relationship with their ancestral lands and to free, prior and informed consent before developments affecting those lands proceed. That standard has not been met here. The consultation process was not genuine engagement, it was a process designed to manage opposition, not to hear it. I did not give my consent. My community did not give its consent. And the cumulative effect of this development, depopulation, destruction of the landscape that sustains Gaelic culture, displacement of young families, erosion of the vernacular community, amounts to a harm that goes far beyond planning policy. It strikes at the continued existence of a people, a language and a way of life that has survived on this island against enormous odds and deserves, at last, to be protected rather than sacrificed.

This application raises serious human rights concerns that Scottish Ministers are legally obliged to consider. I am a Gael. Gàidhlig is my first language and the language of my home and my children. The Gaelic people are an indigenous people of Scotland, and the rights of indigenous peoples, including the right to Free, Prior and Informed Consent before developments affecting their ancestral lands proceed, are enshrined in the UN Declaration on the Rights of Indigenous Peoples, to which the UK is a signatory. That consent was not sought and has not been given. Furthermore, Article 8 of the European Convention on Human Rights protects the right to respect for private and family life and home, a right that is directly engaged when industrial development of this scale is imposed upon the community in which a person lives and is raising their children. The Scottish Government also has a statutory duty under the Gaelic Language (Scotland) Act 2005 to promote and protect the Gaelic language. A development that forces young Gaelic-speaking families from their vernacular communities, the last places on earth where Gaelic is a living, breathing first language, is in direct and irreconcilable conflict with that duty. What is being proposed here is not simply a planning application. It is the extraction of resources from an indigenous community without consent, for the profit of a foreign multinational, at the cost of a culture, a language and a way of life that has survived on this island for over a thousand years. Scottish Ministers must recognise this for what it is.

I ask Scottish Ministers to understand what that means — not as sentiment, but as legal and moral context for this objection.

The Gaelic community has already survived clearances, forced assimilation, the suppression of our language in schools, and generations of economic marginalisation that drove wave after wave of emigration from these islands. Each of those blows reduced the number of Gaelic speakers living in their native communities. We are what remains. My family, my neighbours, my village, we are the last generation for whom Gaelic is a genuinely lived first language in a living, breathing community. That is not an exaggeration. It is a demographic reality that the Scottish Government's own data confirms. We have already lost so much.

What is left is precious beyond calculation, and it is fragile. This development threatens it directly.

I wish to place on formal record my objection to the name by which this development is being marketed. The developer, Northland Power, a Canadian corporation with no cultural connection to Lewis, to Gaelic, or to the communities affected, chose to name this project "Spiorad na Mara," a phrase from the Gaelic language meaning "Spirit of the Sea."

The overwhelming majority of local people in Lewis refuse to use this name. They refer to the development by its designation N4, the name by which the Crown Estate sold the seabed lease. That refusal is not incidental. It is deliberate and it is meaningful.

To take the language of a community, a minority indigenous language that has survived centuries of suppression and is spoken today by a dwindling number of people in a small number of vernacular communities, and use it to brand a development that that community overwhelmingly opposes, is an act of cultural appropriation. It commodifies our language and deploys it against us. It dresses industrial extraction in the clothing of the culture it is in the process of destroying.

This matters in a planning context because it is evidence of the nature of the relationship between this developer and this community. It is not a relationship of respect, partnership or genuine engagement. It is a relationship of exploitation. The name is a symptom of that. Scottish Ministers should understand what it represents to the people of Lewis to see their language used in this way.

My family has discussed leaving. I have spoken to many other young families who are also considering moving, some have had their houses valued in recent weeks. The stress this proposal has brought upon me cannot be put into words. The uncertainty around health impacts, the fear for our children, the feeling of being steamrolled, exploited, bullied, and bought by a foreign developer, our local authority and our own Government, it is unbearable.

My children have a right, recognised under the UN Convention on the Rights of the Child, Article 30, to which the UK is legally bound, to enjoy their own culture and to use their own language. I am raising my children as Gaels, in Gaelic, on the land their ancestors have occupied for over a thousand years. That is not a lifestyle preference. It is the exercise of a fundamental right. A development that makes that life unliveable, that drives our family from this community, directly violates that right. Scottish Ministers must weigh that seriously.

I want to be clear that the harm described in this objection is not hypothetical. It is happening now. The stress this process has brought upon me and my family cannot be fully expressed in words. I have spent hundreds of hours over three years reading documents, attending consultations, writing representations, organising, time taken from my children, my husband, my work and my health. I am not alone in this. Young families across this community are exhausted, frightened and seriously considering leaving. Some are leaving. The uncertainty alone, about health impacts, about our futures, about whether the place we

have chosen to build our lives will still exist in the form we chose it, is causing measurable, daily harm to real people.

New peer-reviewed research published in 2026 confirms that infrasound from turbines the size of those proposed would exceed safe cardiac health thresholds at distances of over 46 kilometres. The closest turbine would be just 6 kilometres from our shore. Infrasound was scoped out of the environmental assessment entirely on the basis of a 1997 methodology. The science has moved on. The regulations have not. My children live 6 kilometres from where these turbines would stand. Their health is not an abstract consideration. It is a human rights issue, and I urge Scottish Ministers to treat it as one.

I have often thought about how the families felt when the SS Metagama sailed from Stornoway, round the Butt of Lewis, watching their home disappear behind them and watching the fires burn along the coast as they left. That image may become a reality again for young families in Lewis. We were cleared once for sheep. We are being cleared now for renewable energy. *Mìorun Mòr nan Gall* is alive and well, and it is not even attempted to be disguised. N4 Spiorad na Mara will contribute significantly to depopulation in Lewis, and Scottish Ministers will bear responsibility for that.

I work at a community hub which serves local people and draws visitors throughout the year. Our primary income is tourism. Over years of speaking with hundreds of visitors, the reason they come to Lewis, consistently and overwhelmingly, is its natural beauty, its wildness and its landscape. Visitors have told me directly that they will not travel hundreds of miles to see industrialisation and wind turbines. If this development proceeds, we lose our income, and we lose our jobs.

The economic damage will not be limited to one employer. Tourism across Lewis and the wider Western Isles depends on the very qualities that this development would destroy. That impact has not been adequately assessed in the application materials and must be independently evaluated before any determination is made. Tourism typically is a large employer from women. If women can't work and can't make a living here, they will leave. You cannot reserve depopulation without women I'm afraid, no matter how many jobs are created for the boys.

Whatever the outcome of this application, I must place on record that the planning process as it currently operates is fundamentally stacked against communities. I have spent hundreds of hours over the past three years engaging with this process, attending consultations, reading documents, raising objections, organising. That time has come at enormous personal cost to me, to my husband, to my children and to my family. Who suffers? We do. The whole process is profoundly unfair, and it functions as a mechanism for wearing communities down, not for genuinely hearing them.

The consultation process for this development was widely described by respondents, including in the developer's own commissioned summary report, as a PR exercise rather than a genuine attempt to listen to local people. Those opposed were not listened to. That must be acknowledged.

I want to ask Scottish Ministers to sit with a word before they make their determination. The word is **cianalas**.

Cianalas is a Gaelic concept that has no precise English equivalent. It is sometimes translated as homesickness or longing, but it is deeper than either of those words conveys. It is a profound recognition of what is truly important in life, rooted in one's ancestral home. It is a connection that transcends the physical and reaches into memory, heritage and soul. There is a phrase sometimes heard in Lewis: "A Lewis man would be homesick in heaven." Cianalas is that feeling, but turned inward, onto a home that is still there but has been changed beyond recognition.

If this development proceeds, cianalas is what I and many others in this community will live with for the rest of our lives. Not homesickness for a place we have left. Homesickness for a home we are still standing in. For a coastline we can still see, but can no longer recognise. For a way of life that existed here, on this land, for generations, and that was ended in a planning office in Edinburgh.

I do not raise this as sentiment. I raise it because it describes a real, measurable and permanent harm to a specific group of people, an indigenous community with a documented and legally recognised relationship to this land and this sea, and because that harm has no equivalent anywhere in the planning framework, which is precisely why it must be named.

I am asking Scottish Ministers to understand what they would be deciding if they approve this application. Not just a planning permission. The end of something that cannot be replaced, and the beginning of a grief that has its own ancient word.

Whatever the outcome, Spiorad na Mara will be another chapter in a long history in which outside forces and governments have reminded the people of Lewis that they are powerless against exploitation, that their language, their home and their heritage are considered worthless against commercial interest. That history does not have to repeat.

The community fought AMEC and won. Scottish Ministers determining this application have an opportunity to demonstrate that community knowledge, environmental integrity and cultural identity carry genuine legal and moral weight in Scotland's planning system.

I urge Scottish Ministers to refuse this application in its entirety.

I also hope that serious lessons can be learnt, I do not want my children to be the third generation in our family to have to be involved in these campaigns because of Government mistakes.

Please note, I am also the author of a forthcoming published chapter, 'Gàidheil Resistance to Energy Colonialism,' which documents this community's experience in detail and will form part of the permanent public record on this matter.

Leis gach deagh dhùrachd

[REDACTED]

[REDACTED]

From: [REDACTED]
Cc: [MD Marine Renewables](#)
Subject: Fwd:
Date: 05 May 2026 21:01:57
Attachments: [Formal Objection Letter to Spiorad na Mara Offshore Wind Farm \(N4\).docx](#)

I would like my objection to this proposed development noted.

My name is [REDACTED]

As noted in the attachment.

[REDACTED]

Begin forwarded message:

From: [REDACTED]
Date: 5 May 2026 at 18:53:02 BST
To: [REDACTED]

<Formal Objection Letter to Spiorad na Mara Offshore Wind Farm (N4).docx>

Sent from my iPhone

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: _____

Postcode: _____ Email: _____ Date: _____

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Photomontage visualisation by Northland Power - Barvas

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

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

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

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

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

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

My further objection points:

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

I respectfully request that this application is rejected.

Yours sincerely,

***Signature:**(type your name here) _____

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

☐

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

Member of Public 2348

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis
Date: 05 May 2026 18:35:59
Attachments: [Formal+Objection+Letter+to+Spiorad+na+Mara+Offshore+Wind+Farm+N4.docx](#)

Good evening,

Please see attached an objection letter for the **MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis.**

Many thanks

[REDACTED]

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

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

My Address: [REDACTED]

Postcode: [REDACTED] Email [REDACTED] Date: 05.05.26

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

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

I object to the Spiorad na Mara Offshore Wind Farm as it raises serious concerns about lack of community consultation, harm to wildlife and protected habitats, and damage to the cultural and historic landscape of the Isle of Lewis. The development could also negatively impact tourism and local livelihoods, while key environmental and onshore effects have not been fully assessed. Given the strong opposition from local residents and the risk of lasting harm, this proposal should be refused.

Please see below for further points of consideration:

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

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

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

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

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

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

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

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

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

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



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

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

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

NMP Para. 4.77 *‘There should be a presumption in favour of publicising applications for marine and terrestrial components of a development together during consenting processes.’*

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

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

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

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

My further objection points:

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

I respectfully request that this application is rejected.

Yours sincerely,

***Signature:** [REDACTED]

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

X

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

Member of Public 2349

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Application reference:MD-00011742 & MD-00011743-Sporad na Mara Limited
Date: 05 May 2026 15:02:19

Please find attached my objection letter to the approve application.

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: 05/05/26

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

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

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

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

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

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

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

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

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.'*



Photomontage visualisation by Northland Power - Barvas

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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:

There will be no positive effects for the inhabitants of the Islands. The power generated will go to mainland cities etc. so build the turbines etc around the cities and so save on cables etc. The disturbance to the sea bed and its flora & fauna will be massive and irreversible, the noise will impact on all local lives and the eddies and currents caused by the air will impact on birds and weather effects onshore and off.

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

Signature:

[Redacted Signature]

Print name:

[Redacted Print Name]



To edit this document in Word, scan this QR code

☐

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

Member of Public 2350

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Letter of objection regarding Spiorad na Mara windfarm
Date: 05 May 2026 14:42:42

Please find attached my letter of objection to the Spiorad na Mara windfarm
Yours sincerely

[REDACTED]

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

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

My address:

Postcode

Email

Date: 5.5.26.

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

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

Lack of Community Engagement: There was no consultation with the communities of west Lewis before Crown Estate Scotland identified and leased the N4 area for development. The plan was imposed on them without consent. **Scotland's National Marine Plan (NMP) GEN 18** 'Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.'
NMP Para. 4.77 'Engagement with the public and other stakeholders should be appropriate, proportionate and meaningful. It should be undertaken as early as possible in planning and consenting processes.'
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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.

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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.'



Photomontage visualisation by Northland Power - Barvas

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

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

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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:

HUMMING NOISE, INDUSTRIAL NOISE, WILDLIFE DISRUPTION.

SEA ~~GAG~~ BIRD & MIGRATORY BIRD DISRUPTION.

NO COMMUNITY BENEFITS - I.E FOR HAVING THESE MONSTROSITIES WITHIN VIEW FROM YOUR PROPERTY.

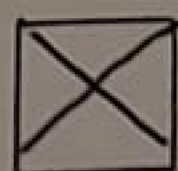
This planning decision is about the long-term future and the character of a landscape and community that cannot be replaced once altered at this scale. Spiorad na Mara Offshore Wind Farm would cause significant, cumulative and largely irreversible harm to landscape and seascape character, heritage setting,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

I respectfully request that this application is rejected.

Yours sincerely,

***Signature:** (type your name here)

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



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

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to Spiorad na Mara Wind Farm
Date: 05 May 2026 14:10:54

MD-00011742 & MD-00011743 - Spioras 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 (where I live) before Crown Estate Scotland identified and leases the N4 area for development. It was imposed on us without consultation or consent.

Significant Adverse Impacts on Protected Birdlife and Habitats: The development occupies primary foraging grounds for Lewis peatland SPA red-throated divers, falks within the St Kilda Gannett colony, crosses a principal UK migration corridor for protected species, including whooper swan and pink footed goose. Where there could be threats of collision, displacement and barrier effects to these declining populations. The consent would breach Conservation Regulations 1994, Offshore Regulations 2018, Marine Scotland Act 2010 and the Wildlife and Countryside Act 1981.

Failure to Protect the Integrity and setting of Scheduled Monuments:
The EIAR anticipates significant adverse effects on coastal heritage. It fails to assess the key impact in key Scheduled Monuments such as SM13786. The proposal would harm the Calanish Monuments and the widee historic landscape by introducing an industrial horizon to our beautiful natural surroundings.

Unassisted onshore Impacts:
Onshore Impacts irreplaceable machair and deep peatland remain unassisted, directly contravenes NPF4 Policy 3, which proposal fails to engage the statutory rights of crafter under the Crofters (Scotland) Act 1993.

Harm to the tourist Economy and Coastal Character:
The Spiorad na Mara wind farm would permanently industrialise the unspoilt coastal scenery on Lewis. Destroying the very thing that attracts visitors to the island. This development risks long term-damage to local businesses.

Community opposition and lack of community Empowerment:
The Community opinion survey on the Spiorad na Mara development published by www.emg-lewis.co.uk in April 2026 found that 88% of the residents from Ness to Uig opposed the N4 development. Approving this project against such overwhelming consensus would directly contrave thr National Islands Plan's commitment to community empowerment.

I love our island, the landscape the rugged natural beauty and especially the coast. Living on West Lewis I strongly oppose this plan. It will have a huge effect on wildlife, tourism and how our coastline looks. We do not want it.

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 04 May 2026 23:44:41

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.'

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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:

I very much want to visit the Isles of Scotland and am devastated to learn about the possibility of this development destroying the natural beauty of these coastlines. Respect the community, respect the natural world, please don't continue with this development.

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

setting, and the tourism economy.

I respectfully request that this application is rejected.

Yours sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 04 May 2026 23:47:52

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

Lack of Community Engagement: There was no consultation with the communities of west Lewis before Crown Estate Scotland identified and leased the N4 area for development.

The plan was imposed on them without consent.

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

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

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

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

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

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

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

NPF4 Policy 7 1 'Development proposals affecting a World Heritage Site or its setting will only be supported where their Outstanding Universal Value is protected and preserved.'

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

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

interest for choosing this site.

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

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

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

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

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

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

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

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

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

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

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

NMP Policy GEN 13: development should avoid significant adverse effects of man-made noise and vibration on species sensitive to such effects. The EIAR predicts disturbance to 9.186% of the Risso's dolphin management unit population and 27.7% of the coastal bottlenose dolphin population from piling noise, yet classifies these effects as "not significant." GEN 13 sets an avoidance standard, not a tolerance threshold.

The developer's own EPS and Basking Shark Risk Assessment (submitted to Marine Scotland, 22 February 2023) formally acknowledges risk of disturbance to minke whale, harbour porpoise, common dolphin, bottlenose dolphin, grey seal and basking shark from survey work alone. Full construction at this scale cannot credibly be claimed to present a lesser risk.

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

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

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

Cumulative and in-combination effects: The Habitats Regulations require assessment of cumulative effects with other plans and projects. The Scottish Government's own 2026 ICIA Screening Report concedes that Scottish offshore wind plans are "likely...to undergo

the derogations process under the Habitats Regulations." Spiorad na Mara is one of several large developments proposed in or adjacent to these waters; the cumulative assessment does not rigorously meet this requirement. NMP GEN 21 requires cumulative impacts affecting the ecosystem to be addressed.

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

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No alternative solutions: Under the Habitats Regulations, consent cannot be granted if alternative solutions exist. Other ScotWind sites are available in waters without the same density of European Protected Species and designated habitats, and the existence of those alternatives is directly relevant to whether consent for this site can lawfully proceed. Consent would therefore breach or inadequately address the Conservation (Natural Habitats &c.) Regulations 1994, the Conservation of Habitats and Species Regulations 2017, the Marine (Scotland) Act 2010, Section 9 of the Wildlife and Countryside Act 1981, NMP Policies GEN 5, GEN 9, GEN 13 and GEN 21, and ASCOBANS Resolution 7.6 (2016) on underwater noise.

My further objection points:

Putting the biggest offshore windfarm in the world 5km from the shores of one of the marine and wildlife dense places in the UK should be considered ecocide. The turbines will be placed in a direct migratory flight path for birds, as well as along feeding grounds for coastal dwelling birds, and the vast array of whales, dolphins and sharks. Flooding our beautiful untouched coastline with huge turbines and ships for years, I along with 1000s more will have to wake up every day and have our clean horizon ruined by cruel and greedy industrialisation. The list of breaches of fair procedure that Northland has done to us here on Lewis is criminal. It's been a snatch and grab during covid while nobody was paying attention. Nobody was consulted and our council lied which they have since owned up to. As a surfer I know I don't want to share the water with toxic run off from turbines, potentially being hit with broken parts in the water, the dangers of this are untold and there is no longterm evidence to dispell my concerns. I've also just bought a house in Brue overlooking Barvas, our dream house and dream location, and I fear we would struggle to sell our house should this go ahead. We will not want to wake up for the next 3-4 decades

with the biggest windfarm in the world on our doorstep. You would be displacing a young family who love the west coast of lewis as we could no longer live here. This project does not fit its surroundings. China has recently installed these size of turbines at the Hai Long2 site located 50km off the coast of Taiwan. Why do Northland insist on putting it on our doorstep? We have no planning for what connects the turbines to the arnish hub. We are fully aware of the salami slicing tactic companies use to make their projects seem small. I wholeheartedly object to this abomination of a project.

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

Yours sincerely,

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

Member of Public 2354

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis
Date: 05 May 2026 22:30:47
Attachments: [Spiorad na Mara Offshore Wind Farm objection.pdf](#)

Good evening

Please find attached a letter outlining my formal objection to the above proposal.

[REDACTED]

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



Sent by email to MD.MarineRenewables@gov.scot

5 May 2026

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

I am writing to object formally to the above application. As I regularly come to Lewis both to visit family and as a tourist to savour its remarkable landscape and hospitality; my viewpoint on the proposed application reflects those of an alarmed outsider.

I feel concerned particularly about how yet another wind farm application is being progressed through the planning application process with scant regard to the communities most affected and whose way of life is being ridden over roughshod by large organisations. Consultation does not appear to have been carried out in accordance with guidelines where:

'The term 'consultation' is used to mean the dynamic process of dialogue between individuals or groups, based on a genuine exchange of views and, normally, with the objective of influencing decisions, policies or programmes of action'.

Scottish Government (2010)

Consequently, I am impelled to tackle this Goliath as did David with five smooth stones.

Scale

The wind farm's impact will be huge by any measure, be it electrical output, environmental damage, visual impact and area occupied. The island's need for power is marginal by comparison to the proposed output making the large scale of the project entirely inappropriate to the needs of the Island communities. There is, of course, the perceived greater good of meeting regional/national power demand which is, arguably, the main driver for the project.

Around the year 2000, Lewis was buoyant with projects for small, community-based turbines which provided a level of technology appropriate to their needs; changes in the political climate coupled with technological advances have enabled ever larger installations to meet national renewable energy targets to the detriment of locally-owned small-scale turbine installations further depriving already vulnerable communities of potential income streams.

The visual impact of the proposed wind farm will be immense. Visitors may not be dissuaded initially but could well be discouraged to return time and again to what will become an industrialised seascape; they will seek paradise found not paradise lost.

Profit

Commercial companies exist to make money for their shareholders and as such drive forward projects to their financial advantage, overcoming any challenges in the process. There is little 'profit' evident for local communities either in lower energy costs or meaningful local infrastructure.

Cost/benefit

There is history of Islander wishes and environmental concerns being overridden by various levels of government in pursuit of the greater good, such as in the Stornoway Wind Farm (SWF) application where:

- Wood (2019, p32) points out in the environmental impact assessment report (EIAR), which highlights numerous concerns, 'a significant effect is not necessarily an unacceptable one when weighed against the benefits in the overall scheme'.
- Scottish Ministers, (2022, p6), in granting the new 2019 application in 2022, noted 'the Planning Authority considered overall the economic benefits of the Development outweighed the considerable harmful effects on the heritage and natural environment.'
- The SWF planning application to the Western Isles Council, Comhairle nan Eilean Siar (CnES), was seen as integral to the Outer Hebrides Local Development Plan (OHLDP) where '...the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term, (CnES, 2021 p3).

However, the cost to Islanders will be borne for the life of the project and arguably beyond until decommissioning removes the visual intrusion. Once the turbines cease generating, the promise of dismantling thins out consistent with falling output; and may be protracted or non-existent should the company be wound-up, possibly leaving the cost to be borne by taxpayers.

From a company perspective, decreasing costs improves benefits; for Islanders the reverse applies as their benefits increase company costs; which naturally raises confrontation between the two parties.

Compromise is often wielded most effectively by the powerful where 'might is right' and becomes unequal in terms of winners and losers. The 'powerful' applicant sees the Island as low-risk, comprising a low population, moderate environmental resistance yet with a supportive government. The 'weak' see injustice akin to colonisation where their natural resources are plundered for the benefit of distant nations while being told of the 'greater good' being worked by all involved. 'Why, they may ask, do these companies not act nearer to home?' The answer is not a lack of natural resource but simply that home projects carry greater risk and the Islander's objections are more readily overcome.

Growth

The political will for growth is unrelenting, believing it to be universally accepted, universally beneficial and universally desirable. However, growth measured in economic terms lacks the completeness of community well-being which is less easily measured and hence frequently sacrificed. Island communities have consistently voiced concerns over their lack of involvement in infrastructure projects, especially those of larger scale. Inevitably, communities have been forced to play the environmental card seeing it as their best hope of resisting inappropriate development. Politicians focus on the promise of jobs and spin-off benefits despite the reality that the majority are necessarily out-sourced to capture the necessary expertise leaving few, low-level opportunities for Islanders.

With regard to infrastructure, there has long been a desire to improve the power connectivity to the mainland as successive wind farm projects have been mooted giving hope to resolving this limitation. The promise for this current planning application lies in a cross-island cable (either above or below ground, each with its own environmental impacts) prior to onward transmission to the mainland. However, as consent for this cable remains irrelevant until after approval of the wind farm itself, should the wind farm be approved there will be virtually irresistible pressure applied to the planning process in support for the cross-island

cable, making it a shoe-in. Any attempt at resisting the cross-island cable could trigger the company, given its profit remit, to have no qualms in simply by-passing the Island altogether with a direct cable to the mainland leaving the Island with virtually no benefit whatsoever. Thus, should the cross-island cable not be approved, it would represent a pyrrhic victory for the objectors.

Future

The project lifespan of construction, production and decommissioning is an estimate. Long-term projects may be subject to delays, difficulties etc. Apart from the possibility of company failure affecting decommissioning, it may be likely that re-commissioning becomes an option where new turbines are simply bolted onto the existing foundations (the non-wearing parts) so extending the project for a further production cycle to the chagrin of the long-suffering Islanders.

Summary

- The scale of this project is disproportionate to the Island's needs, is unsympathetic to communities' wishes, reduces the Island's appeal to visitors and gives a negative net benefit to local tourist-based businesses.
- The commercial benefit is wholly accrued by external investors
- The costs to the environment, the social implications, and the impacts on general well-being are borne entirely by local communities.
- There is minimal real growth for the Island yet the impacts will be felt dearly as decision-making becomes ever more disingenuous
- Project lifetime projections are spurious and unreliable at best.

I trust that my comments and opinions will be given due regard and request that this application is rejected.

Yours sincerely,



Please respect my confidentiality by not releasing my personal details.

References

Comhairle nan Eilean Siar, (2021), Outer Hebrides Local Development Plan: Supplementary Guidance for Wind Energy Development, [Online]. Available at <https://www.cne-siar.gov.uk/media/17792/wind-energy-development.pdf>

Scottish Government, (2010) Planning Advice Note 3/2010: community engagement [Online]. Available at <https://www.gov.scot/publications/planning-advice-note-3-2010-community-engagement/>

Scottish Ministers, (2022) Energy and Climate Change Directorate: Consent under section 36 of the electricity act 1989 and deemed planning permission under section 57(2) of the town and country planning (Scotland) act 1997 for the construction and operation of Stornoway Wind Farm on the Isle of Lewis [Online]. Available at https://planning.cne-siar.gov.uk/PublicAccess/files/DDE69A5A4C94A18B7D21A5E55026DC52/pdf/19_00242_C_ONSG-DECISION_NOTICE-868151.pdf

Wood Environment & Infrastructure Solutions UK Limited, (2019), Stornoway Wind Farm: Environmental Impact Assessment Report Volume 2, [Online]. Available at <https://lwp.scot/wp-content/uploads/2019/05/Volume-2-EIA-Report-Main-Text-REDACTED.pdf>