

**From:** [REDACTED]  
**To:** [MD Marine Renewables](#)  
**Subject:** Wind farm objection MD-00011742 & MD-00011743  
**Date:** 06 May 2026 13:24:47  
**Attachments:** [wind farm objection.pdf](#)

---

Please find attached my objection to the proposed Spiorad na Mara offshore wind farm.

Please acknowledge receipt of this at your convenience.

Regards

[REDACTED]

encl.



Please Email to [MD.MarineRenewables@gov.scot](mailto: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]

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.'*

**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 Nordbland Power - Raynas



**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](http://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:**

### LACK OF UNDERSTANDING OF CULTURAL SIGNIFICANCE:

- ① THE WIND FARM WILL DOMINATE THE VIEW OUT TO SEA FROM EACH OF THE GRAVEYARDS ON THE WEST SIDE OF LEWIS WHICH ARE PLACES OF SPECIAL IMPORTANCE AND SIGNIFICANCE TO THE POPULATION
- ② SEVERAL OF THE VILLAGES ON THE WEST SIDE WERE VICTIMS OF THE HIGHLAND CLEARANCES BY LAND-OWNERS SEEKING PROFIT OVER PEOPLE. THIS IMPOSITION OF THE WIND FARM FEELS LIKE HISTORY BEING REPEATED

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

I respectfully request that this application is rejected.

Yours sincerely,

Signature:

[Redacted Signature]

Print name:

[Redacted 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.



**From:** [REDACTED]  
**Subject:** [MD Marine Renewables](#)  
**Date:** Objection to N4 Spiorad na Mara  
06 May 2026 13:20:34  
**Attachments:** [Objection\\_N4\\_SpioradnaMara.pdf](#)  
[Objection\\_N4\\_SpioradnaMara.pdf](#)

---

Good afternoon,

I previously sent you a 'pages' version of my objection, this is in pdf form.

Hopefully you will be able to open it.

Kind regards,

[REDACTED]



**Figure 1**

I formally object to the above application on the grounds that 88% of the population from Ness to Uig have registered opposition to N4 in the April 2026 Community Opinion Survey published by [www.emg-lewis.co.uk](http://www.emg-lewis.co.uk)

I am a community nurse working on the Isle of Lewis. I have found that the Scottish Islands have the highest suicide rate in Europe and a severe substance abuse problem. There is a delicate balance in the population with mental health leading to suicidal behaviour. N4 constitutes a fundamental change of identity from unspoilt coast and dark skies to massive industrial landscape. There will be a cultural bereavement which will inevitably bring more suicides in its wake. Mental health is affected by environment, in Zou's 2020 paper on 'The Impact of Wind Farms on Suicide' he found the highest incidences of suicide occurred within 25 kilometres of new developments affecting 15-19 year old most and 80 years old as the next most significant group.

I am writing to tell you, I am here, I can see how distressed and depressed people are becoming because of N4. I will do the research and those responsible will have to account for the predictable deaths that will be caused by this development. Please consider the lives that will be lost and deny planning application to N4 Spiorad na Mara.

© 2006 The Authors



**From:** [REDACTED]  
**To:** [MD Marine Renewables](#)  
**Subject:** Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)  
**Date:** 06 May 2026 13:17:57

---

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Community Opposition and lack of Community Empowerment:** The Community Opinion Survey on the Spiorad na Mara Offshore Wind Farm Development (N4) published by [www.emg-lewis.co.uk](http://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 km<sup>2</sup> 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:

THESE MONSTERS ARE TRYING TO TAKE CONTROL OF ALL THE OFFSHORE ISLANDS SEABEDS  
- NOT FOR THE ADVANTAGE OF THE ISLANDERS & TURNING THE WATERS INTO GIANT  
INDUSTRIAL UNITS

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 2368

**From:** [REDACTED]  
**To:** [MD Marine Renewables](#)  
**Subject:** Wind farm objection MD-00011742 & MD-00011743  
**Date:** 06 May 2026 13:16:31  
**Attachments:** [wind farm objection 1.pdf](#)

---

Please find attached my objection to the Spiorad na Mara offshore wind farm.

Please acknowledge receipt of this objection at your convenience.

Regards,

[REDACTED]



Please Email to [MD.MarineRenewables@gov.scot](mailto: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: 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.'*

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

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

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

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

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

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

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

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

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

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





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

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

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

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

**Community Opposition and lack of Community Empowerment:** The Community Opinion Survey on the Spiorad na Mara Offshore Wind Farm Development (N4) published by [www.emg-lewis.co.uk](http://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,



To edit this  
document  
in Word,  
scan this  
QR code

Signature:

[Redacted Signature]

Print name:

[Redacted Print Name]



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:** 06 May 2026 13:05:52

---

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Community Opposition and lack of Community Empowerment:** The Community Opinion Survey on the Spiorad na Mara Offshore Wind Farm Development (N4) published by [www.emg-lewis.co.uk](http://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 km<sup>2</sup> within the Study Area and designated as a PMF and blue carbon habitat - are assessed as sustaining "minor adverse" impact, with no compensatory measures proposed. Maerl beds, horse mussel beds, fan mussel aggregations and cold-water coral reefs (all Scottish PMFs) are either excluded on the basis of decade-old desktop data (Tyler-Walters et al., 2016) or not mentioned at all. The developer concedes that its primary mitigation - micro-siting of turbines and cables - "cannot be quantified until detailed design and further site-specific investigations are complete."

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

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

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

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

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

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

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

My further objection points:

My close family live around the Breasclete/Carloway/Barvas area. I have been visiting for years. This wind farm would totally break my heart to see such amazing scenery blighted by these monsters as has happened off Balmedie near Aberdeen.

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

I respectfully request that this application is rejected.

Yours sincerely,

[REDACTED]

Sent from my iPhone



**From:** [REDACTED]  
**To:** [MD Marine Renewables](#)  
**Subject:** Objection - Spiorad Na  
**Date:** 06 May 2026 12:47:16

---

I formally object to the above application as it contravenes the following planning policies and guidance: Lack of Community Engagement: There was no consultation with the communities of west Lewis before Crown Estate Scotland identified and leased the N4 area for development. The plan was imposed on them without consent. Scotland's National Marine Plan (NMP) GEN 18 'Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.' NMP Para. 4.77 'Engagement with the public and other stakeholders should be appropriate, proportionate and meaningful. It should be undertaken as early as possible in planning and consenting processes,' NPF4 Spatial Principles - Just Transition. 'We will empower people to shape their places.' Lack of understanding of Cultural Significance: The EIAR makes no reference to the personal, cultural or historical attachment of the population of Lewis to their landscape and heritage, and fails to assess impacts on the living intangible heritage of the Gaelic community. Until a full assessment addressing impacts on Gaelic language and culture, community wellbeing, and west Lewis communities' relationship with their coastline is completed and publicly consulted upon, this application cannot lawfully be determined. NMP Para. 4.20 'The historic environment includes all aspects of the environment resulting from the interaction between people and places through time,' NPF4 Policy 7 a 'Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place.' Significant Adverse Impacts on Protected Birdlife and Habitats: The development occupies primary foraging grounds for the Lewis Peatlands SPA red-throated divers, falls within the foraging range of the St Kilda gannet colony, and crosses a principal UK migratory corridor for protected species, including whooper swan and pink-footed goose. The EIAR fails to adequately assess the threats of collision, displacement, and barrier effects to these declining populations. Thus, consent would breach the Conservation (Natural Habitats &c.) Regulations 1994, the 2018 Offshore Regulations, the Marine (Scotland) Act 2010, and the Wildlife and Countryside Act 1981, as the proposal is likely to adversely affect the integrity of the following SPA's: Lewis Peatlands, West Coast of the Outer Hebrides, Seas off St Kilda and St Kilda. NPF4 Policy 7 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](http://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 km<sup>2</sup> 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: Because it will ruin the lovely scenery of the island This planning decision is about the long-term future and the character of a landscape and community that cannot be replaced once altered at this scale. Spiorad na Mara Offshore Wind Farm would cause significant, cumulative and largely irreversible harm to landscape and seascape character, heritage setting, and the tourism economy. I respectfully request that this application is rejected. Yours sincerely, [REDACTED]

**From:** [REDACTED]  
**To:** [MD Marine Renewables](#)  
**Subject:** Objection - Spiorad na Marah - please confirm receipt  
**Date:** 06 May 2026 12:17:33  
**Attachments:** [Formal Objection letter on Spiorad na Mara Offshore Wind Farm 06.05.2026 - Copy.pdf](#)

---

Good afternoon,

Please find my objection in relation to the Spiorad Na Mara Offshore Wind Farm

Please note that my comments can be made public or shared but in accordance with the GDPR, and Data Protection (Scotland) Act please do not share my:

Home Address

E-mail address

Publically. If this impacts on my objection being fully considered please advise. Please confirm receipt of this email and objection.

Thank you

Please Email to [MD.MarineRenewables@gov.scot](mailto: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: \_\_\_\_\_  
0 May 2026

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

I formally object to the above application for a various reasons. It is in clear contravention of

1. Scottish Town and Country Planning Legislation:

Article 3(1) of applicable law of EU Directive 2011/92/EU on the assessment of the effects of **certain public and private projects** on the environment (the 2011 Directive), as amended by Directive 2014/52/EU, which codified EU law on this issue following successive amendments of the predecessor Council Directive 85/337/EC. Both Directives have sought to ensure that the likely environmental impacts of any major project are **considered and assessed before permission for development is granted**.

Article 3(1) provides that every environmental impact assessment ("EIA") shall "identify, describe and assess in an appropriate manner, in the light of each individual case, the direct and indirect significant effects of a project" on a range of environmental factors, including

- (a) population and human health;
- (b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC;
- (c) land, soil, water, air and climate;
- (d) material assets, cultural heritage and the landscape;
- (e) the interaction between the factors referred to in points (a) to (d).

In Scotland, the 2011 Directive is implemented by the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (SSI 2017/102). Installations for the harnessing of wind power for energy production involving more than two turbines with a height of on or over 15 metres are specified as being Schedule 2 development (Schedule 2, Category 3 subparagraph (j)).

Regulation 2 defines EIA development as including "Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location".

Recital (2) in the preamble to the 2011 Directive emphasises that "[e]ffects on the environment should be taken into account at the earliest possible stage in all the technical planning and decision-making processes."

As clear by case law RAESHAW FARMS LIMITED v SCOTTISH MINISTERS and ENERGIEKONTOR UK LTD

Furthermore,

2. Nature Conservation (Scotland) Act 2004 - the duty of every public body and office-holder, in exercising any functions, to further the conservation of biodiversity so far as is consistent with the proper exercise of those functions. The Act requires due regard to:





the United Nations Environmental Programme Convention on Biological Diversity of 5 June 1992 as amended from time to time (or any United Nations Convention replacing that Convention).

3. The **Council of Europe Landscape Convention** ([ETS No. 176](#)), as amended by the 2016 Protocol ([CETS No. 219](#)), promotes landscape protection, management and planning, and organises co-operation between the Parties.

And

4. Wildlife and Countryside Act 1981

The - Spiorad na Mara Offshore Wind Farm is clearly incompatible with the above legislation. I give some clear evidenced examples as follows as to why but more examples are easily evident in the documentation supplied by consultees, on the planning portal.

Explanation as follows.

I refer to the Marine Directorate - Licensing Operations Team Scoping Opinion in May 2024 where Scottish Ministers

*6.1.3 “acknowledge that the Scoping Report states at section 4.6.2 that a HRA Report will be undertaken separately. The Scottish Ministers recommend that the Developer submits a HRA screening report at the earliest opportunity and before the submission of the EIA Report.*

*6.1.4 A gap analysis template is attached at Appendix II to record the environmental concerns identified during the scoping process. This template should be completed and used to inform the preparation of the EIA Report.*

*As part of the submission of the EIA Report the Scottish Ministers advise that Developer must provide confirmation of how this Scoping Opinion is reflected in the EIA Report.*

**Even the 22-08-2024 Habitats Regulations Appraisal – Screening Report cannot rule out significant effects and harms.**

Naturescot state: “CNS / REN / OSWF / N4-Spiorad na Mara – Pre-application” state that the EIA,

*“presents very limited information for this stage in the application process, and there is little new information on the proposal since the Scoping Workshops in mid- 2023. Cumulative effects are briefly addressed in EIA Scoping Report section 4.4, although no detail is set out.”*

There are many further statements by Naturescot in this report, which invalidates the EIA.

For example:

Naturescot have made clear statements that different baseline survey information has to be used. For example:

### **Study area**

*The EIA Scoping Report also defines a regional ‘Wider Marine and Nearshore Study Area’ which uses an arbitrary 150km buffer around the Array Area. We do not support the use of an arbitrary buffer in defining*

*this study area and advise Marine Directorate that this is an inadequate method of determining connectivity for EIA.*

Further obvious evidence from Naturscots consultation which backs up the clear lack of information available, which then in turn invalidates the EIA when they state:

### **Migratory birds**

*It is not clear from the EIA Scoping Report section 6.7.3.8 how impacts on migratory birds will be assessed, either alone or in-combination with existing terrestrial and offshore wind farms which must be considered.*

*This section lists species which overlap the study area in the context of migratory routes. Key in this in terms of the flyway from Scotland to Greenland/Canada via Iceland are the following species:*

- *whooper swan;*
- *Greenland white-fronted goose;*
- *Icelandic Greylag goose; and*
- *great northern diver (not identified).*

*Greenland white-fronted goose is of significant conservation concern as it has unfavourable conservation status. The population is subject to an AEWA Flyway International Plan<sup>11</sup> and as such it must be considered a highly important and sensitive receptor, and any impacts on this population requires thorough assessment, using latest population data. The Icelandic greylag goose population has undergone recent declines.*

Naturscot continued,

### **Appendix C – Marine mammals and other megafauna**

#### **Scoping Questions**

1. Do you agree that the data sources identified are sufficient to inform the Marine Mammal and Other Megafauna baseline for the EIA (and therefore that no further baseline data collection is merited)?

*No, the list of sources should be updated to include SMASS, BDMLR, ORCA ferry surveys, WDC Shorewatch data and SCANS IV sources of cetacean data. It should also include Paxton et al. 2014<sup>16</sup>, Witt et al. 2012<sup>17</sup>, and Speedie and Austin et al. 2019<sup>18</sup> sources of basking shark data. We also note Carter et al. 2022<sup>19</sup> is missing from this list, although it is later referred to in seal density figures.*

*With regard to SCANS data – in some cases, SCANS III and SCANS IV may not have the same coverage in terms of density estimates for every species of cetacean within or between every*

*survey block. We advise the applicant to include species densities for every listed species from SCANS IV wherever possible, and if some are missing that are still found in SCANS III – then use the density estimate through from SCANS III wherever needed (or if SCANS III is significantly higher/more precautionary)*

However, Naturscots assertions that mitigations can be put in place gives rise to an imminent requirement for training in Naturscot on tightening up their consultation responses to meet with the legislative requirements of the EIA. As the effects need to be known and assessed are **considered and assessed before permission for development is granted**.

7. Do you agree that the embedded mitigation measures described provide a suitable means for managing and mitigating the relevant potential likely significant effects of the Project on Marine and Nearshore Ornithology receptors.

*The embedded mitigation measures presented are suitable. However, there is scope for additional mitigation measures as described in our detailed advice below.*

Note that Basking sharks have been found in the area:

**Today Basking Sharks are one of the most heavily protected sharks in UK and EU waters, but this wasn't always the case.**

From 1946-1995 Basking Sharks were heavily fished in the Northeast Atlantic. Targeted for their liver oil and meat. Then for their large fins, which are prized in the shark fin trade.

Basking Shark fisheries displayed a typical 'boom and bust' pattern. Large volumes of mature Basking Sharks were initially caught. Followed by a rapid decline of landings. Until fisheries were no longer financially viable and collapsed. The last Basking Shark fishery in British waters closed in 1995. Leaving Basking Shark populations on the brink.

Basking Sharks are listed as Endangered on the IUCN Red List. Monitoring, management and further research is vital to ensure their survival. And this is why we created the Basking Shark Project.

---

#### **UK and EU Protection:**

In the UK Basking Sharks are protected under:

- Schedule 5 of the Wildlife and Countryside Act 1981
- Countryside Rights of Way Act 2000
- Wildlife (Northern Ireland) Order 1985
- Nature Conservation (Scotland) Act 2004

These Acts make it illegal to intentionally kill, injure or harass Basking Sharks in British waters. Any person committing such an offence could face up to 6 months in prison and a large fine.



They're also protected under:

- **Common Fisheries Policy (CFP)** - In 2007 Basking Sharks became a Prohibited Species in the EU. EU commercial fishing vessels are prohibited from targeting, retaining, trans-shipping or landing them. And this also applies to third country vessels in EU waters.
- **UK Biodiversity Action Plan (BAP)** - In 1997 the Basking Shark was listed in the UK BAP - an inventory of the nation's biodiversity. This identified the Basking Shark as being in urgent need of conservation management and laid out detailed plans for their protection.

<https://www.sharktrust.org/basking-shark-conservation>

Note that the associated "potential risks" and mitigations in the HRA do not give evidence of how basking sharks will be fully protected.

The techniques that will be utilised will be dependent upon ground survey results but could include:

Option 1: Trenchless techniques e.g. Horizontal Directional Drilling (HDD), Direct Pipe or similar,

Option 2: Open-cut trench, and

Option 3: Rock pinning.

For all of these, species-specific impacts must be identified and addressed comprehensively.

### **Unacceptable risk of Harm**

the HRA identified harms without proper mitigations, and species-specific considerations.

See: **Table 3-2: Potential Pressures and Screening Parameters for Marine Mammals**

Underwater noise – the mitigation is not evidenced and not species-specific furthermore the noise does not include reference to the possible use of explosions, for the Unexploded Ordinance Devices, should they be found, in the cable lay route despite the applicant documentation.

Furthermore it appears that the risk is too high:

"Underwater noise, e.g. from pile driving, may lead to death, injury or disturbance and be direct or indirect (e.g., through impacts upon prey) impacts to marine mammals." It is not clear that the mitigation level is strong enough.

EMF. The information in the table relating to the EMFs is inadequate for the following reasons:

- "EMF associated with submarine power cabling may have potential to affect the behaviour of marine mammal prey species."
- No species specific effects are highlighted

- The general class of EMF is not acceptable as it is meaningless without differentiation into at least:

RF: Radio Frequency: 30 MHz – 300 GHz

VLF: Very Low Frequency: 3 kHz -100 kHz

ELF: Extremely Low Frequency: 1 Hz – 3 kHz

- It is likely that the table comments refer only to ELFs as they reference only submarine power cabling. This is unlikely to be the only source of EMFs in the entire development both at survey, laying, construction and operational phase.
- Different signal strengths and frequencies have different effects.
- There is no safe level by ICNIRP on effects of High Frequency EMF on wildlife

Hence it is reasonable to conclude that the mitigation proposed of “Impact restricted to immediate vicinity of the cables, within the ODA,” is inadequate. Evidence would be needed for this statement to hold.

### Habitat loss/gain

“This relates to the loss of marine habitat due to installation of structures, and where relevant the associated introduction of new habitat. **This is a permanent impact** which occurs during the construction phase but will be assessed during operation and maintenance phase. Loss of potentially supporting habitat outside a designated site boundary is deemed inconsequential in the context of wider habitat availability,”

This is an unacceptable level of harm to wildlife and is incompatible with protections in UK and EU legislation.

### Toxic Contamination

“This relates to reduced water or sediment quality from, for example, accidental spillages (e.g. fuel from vessels) or mobilisation of contaminated sediments by activities such as cable ploughing which cause seabed disturbance.”

This is an unacceptable level of harm to wildlife and is incompatible with protections in UK and EU legislation.

Furthermore in Table 3-4: Summary of Offshore and Intertidal Ornithology Pressures

it clearly cites collision with birds once the wind farm is operational as if that is acceptable.

Direct contravention of:

- species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC and The Conservation of Habitats and Species Regulations 2010
- Wildlife and Countryside Act 1981,
- Nature Conservation (Scotland) Act 2004

And

**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** Impact on *'biodiversity including impacts on birds'* must be addressed.

Also

#### **Possible conflicting RAMSAR interests with Natura qualifying interests**

See at 2.2.1.7 of the HRA report that:

2.2.1.7 In accordance with Scotland's Fourth National Planning Framework (NPF4) Policy 4, Ramsar sites (designated under the Conservation on Wetlands of International Importance especially as Waterfowl Habitat 1971 (the 'Ramsar Convention') are also included in this HRA Screening Report. The Scottish Government (2019) reiterated its policy on the protection of Ramsar sites in 2019, specifically stating that "where Ramsar interests coincide with Natura qualifying interests protected under an SPA or an SAC, as the case may be, the interests are thereby given the same level of (legal) protection as Natura sites" and "where Ramsar interests are not the same as Natura qualifying interests but instead match Sites of Special Scientific Interest (SSSI) features, these receive protection under the SSSI regime".

And

**2.2.1.8** As the Project has the potential for Likely Significant Effects (LSEs) on a number of sites designated under the Habitats Regulations and is not connected to the management of any of these sites, if the Report concludes that LSEs cannot be ruled out in respect of any site, the Competent Authority must carry out an Appropriate Assessment (AA) to ascertain whether the Project has any adverse effects on the integrity of such sites. This document provides screening for LSEs and informs the scope of a detailed Report to Inform Appropriate Assessment which will be later provided for the Competent Authority to carry out their AA

The potential impact of the project on Ramsar, and Natura qualifying SSSI features appear to be highly likely but not been fully assessed by HRA nor the NaturScot consultation response. Hence the lack of information does not meet the requirements of an EIA.

**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,’*

Also, Environmental Protection Act 1990 – Artificial Light Pollution.

The evidence above clearly indicates incompatibility with EU, UK and Scottish Law, as well as the NPF. 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

x

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



**From:** [REDACTED]  
**To:** [MD Marine Renewables](#)  
**Subject:** Formal Objection: Spiorad na Mara Offshore Wind Farm - Isle of Lewis  
**Date:** 06 May 2026 10:50:10  
**Attachments:** [Formal Objection Letter to Spiorad na Mara Offshore Wind Farm \(N4\).docx](#)

---

Please find attached my Formal Objection to Spiorad na Mara Offshore Wind Farm - Isle of Lewis

Best wishes,

[REDACTED]

Please Email to [MD.MarineRenewables@gov.scot](mailto: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: 6<sup>th</sup> May 2026

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

**Community Opposition and lack of Community Empowerment:** The Community Opinion Survey on the Spiorad na Mara Offshore Wind Farm Development (N4) published by [www.emg-lewis.co.uk](http://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 2373

**From:** [REDACTED]  
**To:** [MD Marine Renewables](#); [First Minister](#)  
**Cc:** [REDACTED]  
**Subject:** Spiorad na Mara offshore wind farm-isle of Lewis  
**Date:** 06 May 2026 09:58:12  
**Attachments:** [43 ARNOL.pdf](#)  
[37 ARNOL.pdf](#)  
**Importance:** High

---

Marine directorate licensing operations team Scottish gov 375 Victoria road  
Aberdeen AB11 9DB

Attached document to be submitted by seven may 2026

Offshore wind farm Isle of Lewis (m d-0 0 0 1 1 7 4 2 and m d-0 0 1 1 7 4 3)

Kind regards [REDACTED]

Sent from [Outlook for Android](#)

Please Email to [MD.MarineRenewables@gov.scot](mailto: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]

ate: 29.04.26

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

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

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

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

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

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

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

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

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

**NPF4 Policy 7 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: i 'significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or ii exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.'*





**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](http://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,



To edit this document in Word, scan this QR code

Signature:

[Redacted signature]

Print name:

[Redacted print name]



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



Member of Public 2374

Please Email to [MD.MarineRenewables@gov.scot](mailto: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:

29-04-2026

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

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

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

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

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

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

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

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

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

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

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

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

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

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





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

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

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

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

**Community Opposition and lack of Community Empowerment:** The Community Opinion Survey on the Spiorad na Mara Offshore Wind Farm Development (N4) published by [www.emg-lewis.co.uk](http://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 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.



**From:** [Redacted]  
**To:** [MD Marine Renewables](#)  
**Cc:** [Redacted]  
**Subject:** Formal objection to Spiorad na Mara offshore wind farm  
**Date:** 06 May 2026 09:34:28

---

I object to the Spiorad na Mara offshore wind farm, MD-00011742 and MD-00011743 on the following grounds:

- 1) The size and positioning of the turbines. The proposed turbines are far bigger than any others in the UK, and will be some of the largest in the world. To have such massive turbines just 5km from the shoreline is unprecedented. The scale of this development is completely out of proportion to its rural island setting and will dominate not only the west coast but most of the island. We are used to wind turbines onshore and many community owned schemes have been welcomed in the past but this piece of large industrial development should not be happening so close to the shoreline.
- 2) Lack of community engagement. There was no consultation with the communities of west Lewis before the N4 area was leased for development.
- 3) Loss of dark skies. There are a very few places left where you can look to the night sky and see the Milky Way stretching overhead and expect to see the northern lights display regularly. This is one of those places and the lighting arrangements of the turbines and associated structures for navigation, aircraft and security will destroy this.
- 4) Effect on wildlife. The construction phase especially will be hugely destructive and disruptive to marine life such as seals and cetaceans. The turbines themselves have such a massive area of sweep they will have serious impact on resident and migratory birds such as gannets and geese.
- 5) The loss of amenity and wellbeing of the local population is entirely to the benefit of 2 overseas companies. The fishing and the tourism industry here are going to suffer drastically from the 5 years it will take to construct this industrial development and the 35 years it will be in existence. By the time the land and shoreline are restored, a way of living will have been lost. There is no reason that such a large industrial complex must be built so close to the shoreline other than it is more profitable to do so.
- 6) The plans for the related onshore works for the wind farm are not yet known and so the full extent of the potential damage and upheaval of this project to the lives of islanders and the island environment cannot be fully assessed.

Essentially, this development is far too big and far too close to shore with significant negative impacts and I request that this application is rejected.

Regards, [Redacted]

Address: [Redacted]

I want my personal details to be kept confidential.