

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Formal Objection Letter to Spiorad na Mara N4
Date: 06 May 2026 21:59:43
Attachments: [Formal Objection Letter to Spiorad na Mara Offshore Wind Farm N4.docx](#)

Hi there,

Please see attached.

Sent from my iPhone

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

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

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

My address: [REDACTED]

Postcode: [REDACTED] Email: [REDACTED] Date: 06/05/2026

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

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

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

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

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

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

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

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

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

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

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Photomontage visualisation by Northland Power - Barvas

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

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

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

My further objection points:

National Planning Framework 4 (NPF4)

Policy 11 (Energy) – Critical policy test

Requirement:

- Renewable energy developments must maximise net economic impact, including local and community socio-economic benefits.

Contravention:

This project Planning application is dependent on aspirational supply chain statements rather than enforceable outcomes. Evidence and consultation feedback highlight:

- Complete lack of commitment to local manufacturing/fabrication opportunities
- Perception that economic benefits are largely externalised, no concrete commitment
- Lack of clarity on long-term local supply chain integration

If the majority of capital expenditure (especially fabrication/installation) occurs out with the Outer Hebrides / Scotland, the proposal fails to demonstrate maximisation of local economic benefit and risks being policy non-compliant, not just sub-optimal.

Policy 1 (Tackling Climate & Nature Crisis) – Balanced with a Just Transition

Requirement:

- Development must contribute to net zero AND a "fair and inclusive" (wellbeing) economy.

Contravention:

- Weak local benefit and legacy:
 - Undermines Just transition principles

- Creates extractive development model (national gain vs local loss)

A project delivering national carbon benefits but minimal local economic return risks failing the “fair transition” dimension embedded in Policy 1.

Cross-cutting NPF4 Principle – Community Wealth Building

Requirement:

- Planning should support:
 - Community wealth building
 - Retention of value locally
 - Stronger regional economies

Contravention:

- Limited or no:
 - Local ownership / shared ownership
 - Retention of value in Outer Hebrides
 - Enduring economic infrastructure
 - Legacy

The proposal is inconsistent with NPF4 spatial strategy, which explicitly links planning to regional economic transformation.

Socio-Economic Impact & “Maximisation” Test (Statutory EIA context)

Under:

- Electricity Works (EIA) (Scotland) Regulations 2017
- EIAR must robustly assess socio-economic impacts

There’s an over-reliance on:

- National-level benefits (jobs, supply chain)
- Assumptions rather than secured commitments

With no demonstration of:

- Additionality (what new activity happens locally)
- Deadweight/leakage analysis (benefits leaving region)

If benefits are:

- Uncertain
- Non-committed
- Geographically displaced

The project will not demonstrate significant positive local socio-economic effects, weakening compliance.

Scottish Government Guidance – Community Benefit (Offshore Wind)

Good Practice Principles (Offshore Renewables)

Developers should:

- Deliver meaningful, place-based community benefit

- Ensure alignment between impact and benefit distribution

Contravention:

- Community concerns include:
 - Lack of clear, proportionate local benefits
 - No defined or committed linkage between impact (visual/social) and local reward

There's a mismatch between locally experienced impacts and scale/location of benefits, it fails the principle of fair distribution of value from national resources.

National Marine Plan (Scotland)

Renewables Policy 10

- Developers should follow community benefit good practice guidance

Contravention:

Community benefit is minimal in scale, not tied to impact the Outer Hebrides positively and is not co-designed with local stakeholders, therefore it is not aligned with marine planning expectations.

Just Transition & Islands Policy Context

National Islands Plan / Islands (Scotland) Act 2018

Development should support sustainable local economies and avoid disproportionate negative impacts on island communities

Contravention:

- Key risks of this development include:
 - Significant economic leakage off-island, with no requirement on 'local first' strategy either through their own procurement or their Tier 1 and 2 suppliers
 - Significantly low job retention locally short-term, with no clear long-term commitment to certain job figures/ opportunities
 - Structural dependence without ownership

Project risks reinforce the peripheral extraction model and do not deliver island resilience or population sustainability.

Evidence from Consultation (Material Consideration)

- Community feedback highlights:
 - Concern over lack of local fabrication/manufacturing opportunities
 - Perception benefits "outweighed by risks"
 - Importance of community benefit to acceptability

Planning relevance:

- Demonstrates:
 - Social licence deficit
 - Failure to meet policy intent around inclusive growth

In summary, Spiorad na Mara N4:

- Fails (or risks failing) NPF4 Policy 11(c) by not clearly maximising local economic and community benefit

- Is in tension with NPF4's core principle of community wealth building due to high economic leakage and weak local retention
- Is inconsistent with Scottish Government community benefit guidance due to a lack of proportionate, place-based legacy
- Risks undermining just transition and islands policy objectives by delivering national decarbonisation without local economic transformation

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 without any lasting legacy for the local economy, Place or people.

I respectfully request that this application is rejected.

Yours sincerely,
[Redacted]

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

[Redacted]

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

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](#)
Date: 06 May 2026 21:57:55

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Significant Adverse Impacts on Marine Mammals and Protected Marine Habitats: The Outer Hebrides are described by the Scottish Government's own scientists as "probably the richest area of the UK for marine mammals with around 20 species of cetacean recorded in the region over the last 30 years" (Scottish Marine and Freshwater Science Vol. 5 No. 9). The site lies adjacent to the Inner Hebrides and Minches SAC - the largest harbour porpoise SAC in Europe - within the wider range of the North-east Lewis MPA for Risso's dolphin, within documented fin and sperm whale migration corridors (Blue Corridors initiative), and within the wider feeding and habitat range of minke, humpback and sei whales, and within the foraging range of the Monach Isles grey seal colony (the largest in Europe). The EIAR fails to reflect this internationally significant baseline in its significance conclusions and cannot demonstrate, to the legal standard required, that adverse effects on these protected sites and species will be avoided. Under the Habitats Regulations Appraisal process, consent must be refused unless Scottish Ministers are satisfied beyond reasonable scientific doubt that the integrity of European sites will not be adversely affected (NatureScot HRA guidance). That standard has not been met. Construction noise: The developer's own noise modelling (EIAR Appendix 19.2) provides for up to 5.5 hours of percussive piling per day, up to 10,635 strikes per pile per day, hammer energies up to 5,000 kJ, and 1,563 pin piles across two consecutive construction years (April–October). The EIAR itself acknowledges that "harbour porpoises are widely regarded as the most sensitive marine mammal receptor to underwater noise"

and that behavioural disturbance can occur up to 70 km from piling (Bailey et al., 2010, cited in Chapter 13). The proposed piling window coincides with peak cetacean seasonal density and with harbour seal pupping (June–July), triggering the prohibition on deliberate disturbance of European Protected Species during breeding and rearing periods under the Conservation of Habitats and Species Regulations 2017 and Section 9 of the Wildlife and Countryside Act 1981. The developer's own underwater noise modelling (EIAR Appendix 13.3) confirms that, even with noise mitigation applied, percussive piling at the northernmost foundation location generates a PTS (permanent auditory injury) range of up to 1,500 m for low-frequency cetaceans and a TTS (temporary auditory injury) range of up to 49 km. These are the developer's own figures, after mitigation. Low-frequency cetaceans include minke, fin, sei and humpback whales - all species documented in these waters. A 49 km auditory injury zone, repeated across an April–October piling window for two consecutive years, cannot credibly be reconciled with a classification of effects as "not significant." NMP Policy GEN 13: development should avoid significant adverse effects of man-made noise and vibration on species sensitive to such effects. The EIAR predicts disturbance to 9.186% of the Risso's dolphin management unit population and 27.7% of the coastal bottlenose dolphin population from piling noise, yet classifies these effects as "not significant." GEN 13 sets an avoidance standard, not a tolerance threshold. The developer's own EPS and Basking Shark Risk Assessment (submitted to Marine Scotland, 22 February 2023) formally acknowledges risk of disturbance to minke whale, harbour porpoise, common dolphin, bottlenose dolphin, grey seal and basking shark from survey work alone. Full construction at this scale cannot credibly be claimed to present a lesser risk. The 2023 Tolsta Stranding: In July 2023, 54 of 55 long-finned pilot whales died on Traigh Mhòr beach while geophysical surveys were being carried out at this lease area. The Scottish Government investigation could not rule out anthropogenic contribution and explicitly acknowledged limitations in the acoustic detection capability of the recorders used. This recent and devastating event must weigh heavily in this decision. Priority Marine Features and seabed disturbance: Kelp beds - confirmed present across 10 km² within the Study Area and designated as a PMF and blue carbon habitat - are assessed as sustaining "minor adverse" impact, with no compensatory measures proposed. Maerl beds, horse mussel beds, fan mussel aggregations and cold-water coral reefs (all Scottish PMFs) are either excluded on the basis of decade-old desktop data (Tyler-Walters et al., 2016) or not mentioned at all. The developer concedes that its primary mitigation - micro-siting of turbines and cables - "cannot be quantified until detailed design and further site-specific investigations are complete." NMP GEN 5: safeguard natural carbon sinks including kelp beds. NMP GEN 9: do not result in significant impact on the national status of Priority Marine Features, and protect and enhance the health of the marine area. Cumulative and in-combination effects: The Habitats Regulations require assessment of cumulative effects with other plans and projects. The Scottish Government's own 2026 ICIA Screening Report concedes that Scottish offshore wind plans are "likely...to undergo the derogations process under the Habitats Regulations." Spiorad na Mara is one of several large developments proposed in or adjacent to these waters; the cumulative assessment does not rigorously meet this requirement. NMP GEN 21 requires cumulative impacts affecting the ecosystem to be addressed. Inadequate assessment and deferred mitigation: The joint representation from the Hebridean Whale and Dolphin Trust and Whale and Dolphin Conservation states that baseline cetacean data is "severely lacking." Proposed mitigation (MMOs, PAM, soft-start) is designed to address acute physical injury, not behavioural displacement;

JNCC guidance confirms PAM has "limited range" for harbour porpoise and is "not suitable" for seals and baleen whales. Key mitigation is deferred to a post-consent Marine Mammal Mitigation Protocol, preventing Scottish Ministers from assessing adequacy at the point of determination - contrary to the beyond-reasonable-scientific-doubt standard required under the Habitats Regulations. Peer-reviewed monitoring at Scottish offshore wind farm construction sites (Benhemma-Le Gall et al. 2021, *Frontiers in Marine Science*) observed harbour porpoise displacement up to 12 km from pile-driving and 4 km from construction vessels alone - distances that no MMO, PAM or soft-start zone can address. The EPS licence contradiction: The EIAR identifies that activities may require an EPS licence due to disturbance at a level requiring legal derogation, while simultaneously concluding residual effects are "negligible or minor." Under the Conservation of Habitats and Species Regulations 2017, an EPS licence can only be granted where no satisfactory alternative exists, imperative reasons of overriding public interest apply, and favourable conservation status is maintained. The EIAR demonstrates none of these. Basking sharks (IUCN Endangered) were recorded by the developer's own July 2023 aerial survey (EIAR Appendix 13.1). The EIAR does not adequately assess EMF impacts from subsea cables on elasmobranchs, despite Scottish Government ScotMER research identifying this as an unresolved evidence gap (FF.07). No alternative solutions: Under the Habitats Regulations, consent cannot be granted if alternative solutions exist. Other ScotWind sites are available in waters without the same density of European Protected Species and designated habitats, and the existence of those alternatives is directly relevant to whether consent for this site can lawfully proceed. Consent would therefore breach or inadequately address the Conservation (Natural Habitats &c.) Regulations 1994, the Conservation of Habitats and Species Regulations 2017, the Marine (Scotland) Act 2010, Section 9 of the Wildlife and Countryside Act 1981, NMP Policies GEN 5, GEN 9, GEN 13 and GEN 21, and ASCOBANS Resolution 7.6 (2016) on underwater noise. My further objection points: I can't understand why anyone would think this is acceptable. Really sad to think of the impact this will have on our incredible sea life first & foremost. But equally our beautiful scenery being destroyed. Heartbreaking. 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

Sent from my iPhone

Member of Public 2398

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Spiorad na Mara Offshore Wind Farm N4
Date: 06 May 2026 21:47:12
Attachments: [Formal Objection Letter to Spiorad na Mara Offshore Wind Farm N4.docx](#)

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[REDACTED]

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

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

My address [REDACTED]

Postcode: [REDACTED]

Email [REDACTED]

Date: 6th May 2027

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My further objection points:

I am writing to raise my objection to the proposed scheme as part of the diaspora of people from the West Side of Lewis with a strong affinity for the land, its people and its culture. My family have worked the land in Bragar, Shawbost and Dalbeg for many centuries. This continues up to this day. The final resting place for my parents, grandparents and wider family is the Bragar Cemetery. Ironically this includes my father, [REDACTED], who as an engineer with the Hydro Board, was awarded the MBE for his part in bringing electricity to the Highlands and Islands in the 1960s. While he took pride in the many Hydro schemes throughout the Highlands, he would have been horrified at the scale and impact of the proposed scheme.

Regardless of the merits of the proposed scheme, the justification for siting the development in this specific location requires further justification by CNES, Scottish Ministers and Marine Scotland. The case for the choice of site in inshore waters needs to be made public. The rationale for rejecting alternative sites beyond 12 miles needs to be published and made subject of public debate.

The windmills proposed as part of the scheme are extremely large and it is proposed that they will be situated very close to the shore. The impact on residents and visitors to all the villages on the West Side of Lewis will be significant.

The history, serenity and authenticity of the environment will be damaged impacting tourism at a time when more people are visiting Lewis on cruise ships or independent travellers. Visitors to the historic sites and beautiful landscapes of the West Side of Lewis will be confronted with a large-scale industrial development. It is highly likely that they will choose not to visit Lewis or to concentrate their visits elsewhere. The documents submitted do not attempt to measure the potential impact of industrialisation on the appeal of the landscape to tourists or to evaluate the impact of tourists concentrating in other parts of Lewis, Harris or the Uists.

The development will impact the natural environment of the West Coast of Lewis. The fact that the development will be visible from the World Heritage site at the Calanish Stones is difficult to countenance. The disturbance of a special environment which man has studied, worshiped and treasured for thousands of years is unacceptable. The significant visual impact through industrialisation of the coastal landscape stretching from Carloway to Shader is also unacceptable.

Academic studies indicate the health implications of windfarms. The mitigations proposed are inadequate. This will be amplified by the installation of gigantic structures so close to the shore. A fund should be established to enable local people to improve their homes so that noise and other health risks are mitigated.

The proposal fails to demonstrate the nature and scale of any economic benefit to the people of Lewis. This must be quantified before the scheme can be considered further. The people of Lewis should follow the example set by Shetland in their negotiations with the Oil Industry and secure a percentage of profits so that a "Sovereign Wealth" fund can be established. This would provide a vehicle for investment to sustain the community.

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

I respectfully request that this application is rejected.

Yours sincerely,

Signature:(type your name here)*

[REDACTED]

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

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: Dear sir/madam
Date: 06 May 2026 20:47:13

I'm a self employed fisherman from the west coast of Lewis . These wind turbines are nothing but killing our island life ,nature and more importantly the impact it's going to cause the future of our island for work on the long term sustaining our future to live or work the island life we where brought up to do and shown by our fathers and grandfather generation. We work these fishing ground every year my [REDACTED] boys want to start the fishing industry but what chance do they have when people who don't even know where the island is think it's better for them . Nothing but trouble will come to the island with a significant amount of strangers our safe island environment is running before our eye .

[REDACTED]
Sent from my iPhone

Member of Public 2400

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: SPIORAD NA MARA WIND FARM OBJECTION - 06/05/2026
Date: 06 May 2026 20:42:06
Attachments: [Formal+Objection+Letter+to+Spiorad+na+Mara+Offshore+Wind+Farm+N4 \(1\).docx](#)

Good evening,

Please register this email as an objection to the proposed Spiorad Na Mara windfarm.

Regards,

[REDACTED]

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

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

My address: [REDACTED]

Postcode: [REDACTED] Email: [REDACTED] Date: 06/05/2026

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

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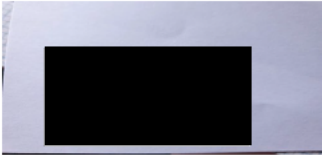
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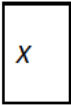
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My address

Postcode

Email

Date:

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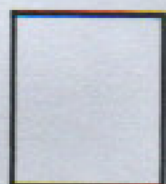
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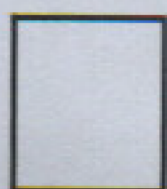
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Signature

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: Spiorad Na Mara Planning Objection
Date: 06 May 2026 21:55:48

Dear Sir/Madam,

I write as an individual member of the local community and as an active surfer on the west coast of Lewis to formally object to the above application.

Spending time on the west coast—particularly at Barvas, Dalmore, Dalbeg and Eoropie—has been a constant throughout my life: as a child, as a young adult, and now as a parent bringing up my own child in this environment. This coastline is integral to my identity, my culture, and my sense of place, especially through my involvement in the surfing community. I am also an artist, and this landscape, culture and way of life are central to my work and inspiration. Where many who grew up here have felt compelled to leave, I have chosen to remain on Lewis because of this coast and its wilderness. For me, this is not simply about a view—it is about belonging to a community, and the risk of losing what I consider to be my heritage, culture and community.

In my view, the applicant has failed to recognise or adequately assess the impact that this development will have on the surfing community and other coastal and marine users.

At the outset of this development process, it was indicated that local communities had been consulted and were supportive of the proposal. However, as a regular user of the coastline directly affected by this development, I was not contacted or consulted at any stage. This raises concerns regarding the completeness and inclusiveness of the consultation process.

Furthermore, I am aware that concerns were raised during the Environmental Impact Assessment (EIA) process by members of the surfing community, including detailed submissions outlining potential impacts and suggested actions. It is not evident within the EIAR how these concerns have been meaningfully addressed or how they have influenced the assessment or design of the project.

Re: Spiorad na Mara Offshore Wind Farm – Section 36 Consent, Marine Licence Application, and Associated Onshore Development

This objection is based on the failure of the Environmental Impact Assessment Report (EIAR) and associated submissions to comply with:

- The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
 - The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
 - Marine Scotland consenting guidance
 - National Planning Framework 4 (NPF4)
 - Comhairle nan Eilean Siar Local Development Plan (Outer Hebrides LDP)
-

1. Failure to Identify Surf Breaks as Sensitive Receptors

The EIAR fails to identify key surf locations on the west coast of Lewis, including Barvas,

Bragar, Shawbost/Dalbeg, and Arnol, as discrete receptors.

As someone who regularly uses these locations, I can confirm their importance not only recreationally but also in terms of their sensitivity to environmental change.

This is contrary to EIA requirements and conflicts with:

- Outer Hebrides LDP Policy EI 8 (Coastal Protection)
 - NPF4 Policy 4 (Natural Places)
-

2. Failure to Assess Impacts on Wave Transformation and Coastal Processes

The EIAR acknowledges seabed disturbance but does not assess indirect effects on wave transformation and surf break quality.

Changes to seabed conditions have the potential to directly affect wave patterns and surf quality at these locations.

This conflicts with:

- EIA requirements for indirect effects
 - LDP Policy EI 8 (Coastal Protection)
 - LDP Policy EI 1 (Natural Environment)
 - NPF4 Policy 4
-

3. Landfall Impacts Not Adequately Assessed

Landfall areas along the west coast of Lewis are in proximity to sensitive coastal environments and surf breaks.

The EIAR does not adequately assess impacts of HDD, cable installation, or sediment disturbance.

This conflicts with:

- LDP Policy EI 8 (Coastal Protection)
 - LDP Policy EI 9 (Waste Water and Drainage)
 - NPF4 Policy 4
-

4. Excessive Design Uncertainty (Project Design Envelope)

Key parameters remain undefined, preventing meaningful assessment.

This conflicts with:

- EIA requirements for a reasoned conclusion
- LDP Policy PD1 (Placemaking and Design)

- NPF4 Policy 2 (Climate and Nature Crisis)
-

5. Segmentation of Offshore and Onshore Development

The project is split between offshore and onshore applications, preventing holistic assessment.

This conflicts with:

- EIA requirements
 - LDP Policy EI 1 (Natural Environment)
 - NPF4 Policy 3 and 4
-

6. Inadequate Assessment of Construction Impacts

Up to 5 years of 24-hour construction is proposed, with insufficient assessment of impacts on recreation and amenity.

This conflicts with:

- EIA requirements
 - LDP Policy PD1
 - NPF4 Policy 14
-

7. Failure to Assess Access Restrictions

Potential safety zones and access impacts are not properly assessed.

This conflicts with:

- EIA requirements
 - LDP Policy EI 10 (Tourism)
 - NPF4 Policy 13 and 14
-

8. Inadequate Consideration of Alternatives

Alternatives do not demonstrate minimisation of impacts on coastal receptors.

This conflicts with:

- EIA requirements
 - LDP Policy EI 8
 - NPF4 Policy 1
-

9. Failure to Assess Cultural and Community Impacts

Surfing is an important part of my own use of the coastline and contributes to the wider cultural and recreational value of the area.

This conflicts with:

- EIA requirements
 - LDP Policy EI 10
 - NPF4 Policy 25
-

10. Inadequate Cumulative Impact Assessment

Combined impacts from multiple developments are not sufficiently assessed.

This conflicts with:

- EIA requirements
 - LDP Policy EI 1
 - NPF4 Policy 4
-

11. Impacts on Peatland and Carbon-Rich Soils

Onshore infrastructure may impact peatlands and carbon stores.

This conflicts with:

- NPF4 Policy 5 (Soils)
 - LDP Policy EI 5 (Peatlands)
-

12. Landscape and Visual Impact

The development risks significant adverse landscape and seascape effects.

This conflicts with:

- NPF4 Policy 4 and 14
 - LDP Policy PD2 (Landscape)
-

13. Impact on Tourism and Recreation

The development may negatively impact tourism and recreation.

This conflicts with:

- NPF4 Policy 10 (Sustainable Tourism)
 - LDP Policy EI 10 (Tourism)
-

14. Infrastructure and Transport Impacts

Construction traffic and abnormal loads may impact local infrastructure.

This conflicts with:

- NPF4 Policy 13
 - LDP Policy TA 1 (Transport Infrastructure)
-

15. Risk of Pollution and Environmental Damage

Pollution risks are not fully assessed or mitigated.

This conflicts with:

- NPF4 Policy 4
 - LDP Policy EI 1
-

16. Precedent and Cumulative Industrialisation

The development contributes to wider industrialisation of the coastal environment.

This conflicts with:

- NPF4 Policy 1
 - LDP Policy EI 1
-

17. Lack of Sufficient Detail to Enable Determination

Key details remain undefined or deferred.

This is contrary to:

- EIA Regulations
 - Marine Scotland guidance
-

Conclusion

The application fails to comply with statutory EIA requirements and conflicts with national and local planning policy.

As an individual who regularly uses the west coast for surfing and recreation, I consider that this proposal poses a direct risk to the quality, accessibility, and environmental integrity of these coastal areas.

The lack of meaningful consultation and the failure to properly assess impacts on surf breaks and coastal processes means that the concerns of individuals like myself have not been adequately considered.

It does not provide sufficient information to allow a reasoned conclusion on environmental, social, and recreational impacts.

I therefore request that:

- The application be refused; or
- Further information be required, including specific assessment of surf breaks, coastal processes, and recreational impacts

Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 06 May 2026 22:11:45

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

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

The plan was imposed on them without consent.

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

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

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

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

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

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

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

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

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

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

interest for choosing this site.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The EPS licence contradiction: The EIAR identifies that activities may require an EPS licence due to disturbance at a level requiring legal derogation, while simultaneously concluding residual effects are "negligible or minor." Under the Conservation of Habitats and Species Regulations 2017, an EPS licence can only be granted where no satisfactory alternative exists, imperative reasons of overriding public interest apply, and favourable conservation status is maintained. The EIAR demonstrates none of these. Basking sharks (IUCN Endangered) were recorded by the developer's own July 2023 aerial survey (EIAR Appendix 13.1). The EIAR does not adequately assess EMF impacts from subsea cables on elasmobranchs, despite Scottish Government ScotMER research identifying this as an unresolved evidence gap (FF.07).

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

My further objection points:

While I don't live on Lewis, I have VERY strong family links to the island and I visit on a frequent and regular basis. The damage that would be inflicted by this project on the marine/terrestrial ecosystems, the economy and the social fabric of Lewis if this project were ever to go ahead would be absolutely devastating. In addition, the benefits to islanders are highly questionable. I, as well as my immediate family, strongly oppose N4 and want the application rejected.

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]

Sent from [Outlook for iOS](#)