

Member of Public 2406

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis - EIA Section 36 Consent and Marine Licence Application - Consultation
Date: 07 May 2026 16:20:09
Attachments: [Spiorad na Mara Offshore Wind Farm - Isle of Lewis .docx.pdf](#)

To whom it may concern,

Hope you are well.

Please find attached my letter against the proposed Spiorad na Mara Offshore Wind Farm on the Isle of Lewis.

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Regards,

[REDACTED]

Name: [REDACTED]

Address: [REDACTED]

Email: [REDACTED]

7 May 2026

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

For the attention of the Scottish Ministers.

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

Dear Scottish Ministers,

I write to formally object to the application by Spiorad na Mara Limited to construct and operate an offshore wind farm off the west coast of the Isle of Lewis.

I strongly believe that the windfarm is not in the best interests of the residents on the Isle of Lewis. My mother was born and raised on the island and I have many happy memories of summers spent up there with my grandparents and extended family. We loved how peaceful it was. Every year, I still return to the island to visit my mother who returned home several years ago.

My objection is based on:

1. Incomplete Information

The developer's paperwork is full of gaps. They are using a 'design envelope', which means they aren't telling us the exact size or number of turbines yet, making it impossible to know the real damage.

In planning terms, the Environmental Impact Assessment Report (EIAR) is deficient because it lacks

site-specific data and fails to assess a realistic worst-case scenario:

- The application represents a deficient EIAR because it contains significant gaps in baseline data regarding local species. (National Marine Plan; NPF4 Policy 1)
- The developer has made a failure to apply a realistic worst-case scenario, meaning the true impacts remain unknown. (Electricity Works (EIA) (Scotland) Regulations 2017)
- The use of the Rochdale Envelope principle in this sensitive location is inappropriate as it masks the scale of environmental harm. (NPF4 Policy 4; Marine Scotland Guidance)

2. 'Fix it Later' Promises

The developer is asking for permission now and promising to figure out how to fix environmental damage later. We can't trust a plan that hasn't been written yet.

In planning terms it is problematic to rely on post-consent mitigation. The authorities cannot judge if the project is safe if the solutions are not provided before the decision is made:

- I object to the reliance on post-consent mitigation, as the effectiveness of these measures cannot be scrutinised now. (NPF4 Policy 3; Habitats Regulations)
- The proposal suffers from procedural uncertainty, as key protection plans have been deferred until after permission is granted. (Planning and Infrastructure Act 2025)
- The pre-determination of mitigation without evidence-based results fails the test of a robust planning application. (NPF4 Policy 1)

3. Economic Damage to Lewis

The island bears all the costs while the high-paying jobs and profits go off-island. Local businesses may lose staff to short-term wind farm jobs. Particular impact on the tourism sector is insufficient. In planning terms, the project violates Community Wealth Building policies and risks cannibalising our local workforce:

- The proposal creates a significant socio-economic imbalance and facilitates the benefit export of wealth away from the island. (NPF4 Policy 25; National Marine Plan Policy GEN 2)
- The EIAR fails to model how the "high magnitude of change" to the seascape will reduce Tourism Gross Value Added (GVA) (NPF4 Policy 30; LDP Policy ED1)
- The lack of a compliant Island Communities Impact Assessment (ICIA) means the vulnerability of the vital tourism sector hasn't been legally evaluated (Islands (Scotland) Act 2018; NPF4 Policy 4)
- Lack of assessment of industry cannibalisation, where the project causes labour displacement from our vital care and tourism sectors. (NPF4 Policy 30)
- The development fails the NPF4 Policy 25 mandate for Community Wealth Building. (NPF4 Policy 25)

4. Ignoring our Culture

The assessment ignores our Gaelic language, our traditions tied to the sea, and how we actually use our landscape today.

In planning terms, the developer has failed to assess intangible heritage and the living landscape, violating the requirement to protect the unique cultural identity of our island communities:

- The assessment fails NPF4 Policy 7 by ignoring the intangible and living heritage of the West Side community. (NPF4 Policy 7; Historic Environment Policy for Scotland (HEPS))
- There has been an inadequate Island Communities Impact Assessment (ICIA) regarding the impact on Gaelic culture and local traditions. (Islands (Scotland) Act 2018)
- The project fails to respect the Cultural Landscape as a whole, treating historic sites as isolated objects rather than a living environment. (LDP Policy EH1; NPF4 Policy 7)

5. Hidden Impacts on Mental Health

A report showing that local residents are suffering from high levels of stress and anxiety was kept out of the main public documents.

In planning terms, by not disclosing the full Social Impact Assessment (SIA) data, the developer has prevented the community from seeing the true health risks:

- I object to the non-disclosure of social impact data, which prevents a transparent assessment of the project's risks. (NPF4 Policy 14; Aarhus Convention)
- The proposal will have a documented adverse impact on mental health and wellbeing, which is a material violation of NPF4 Policy 14. (NPF4 Policy 14 (Health and Wellbeing))

6. Fishing, Marine Life, and Protected Species

The developer's study of West Lewis waters is dangerously incomplete, not taking into account the full impact on the local fishing industry and marine life.

In planning terms the proposal fails to provide a robust evidence base for marine mammals and ignores the displacement of the local fishing fleet:

- "The application contains significant methodological deficiency by using biased aerial surveys that ignore established land-based basking shark data." (National Marine Plan Policy GEN 9)
- "The proposal fails NPF4 Policy 11 and NMP Policy GEN 4 as it provides no evidence that alternative fishing grounds are available to prevent industry cannibalisation." (NPF4 Policy 11; NMP Policy GEN 4)
- "The requirement for European Protected Species (EPS) licenses proves that environmental impacts are not 'negligible' as claimed." (NPF4 Policy 3; EPS Regulations)

7. Risks to Bird Life

This area is a vital feeding ground and a major highway for migrating birds. The developer is trying to bypass nature laws because they know the project will likely harm protected species.

In planning terms, the developer has already filed a Derogation Case, which is a legal loophole used when a project admits it will definitely damage a protected area:

- The developer's own Habitats Appraisal Derogation Case proves that the project cannot be completed without damaging protected nature sites. (Habitats Regulations; NPF4 Policy 3)
- The proposal fails the Precautionary Principle, as there is no evidence beyond reasonable scientific doubt that local bird populations will survive. (National Marine Plan Policy GEN 9)
- I object on the grounds that the project poses an unacceptable risk to SPA-integrity (Special Protection Areas). (NPF4 Policy 4; Birds Directive)

8. Failure to Help Nature and Pollution Risks

In Scotland, just doing less harm isn't enough anymore. Big projects are legally required to leave nature in a better state than they found it.

In planning terms, the developer has failed the mandatory Enhancement test required by NPF4:

- The project fails the NPF4 Policy 3 mandate, which requires a measurable net gain for biodiversity, not just mitigation. (NPF4 Policy 3)
- The proposal offers no genuine biodiversity enhancement and fails to contribute to our local Nature Network. (NPF4 Policy 3(a))
- Failure to provide detailed CEMPs or Pollution Prevention Plans prevents a robust assessment.
- "An Appropriate Assessment cannot conclude 'no adverse effect' given that high-energy piling will disturb 28% of the local bottlenose dolphin population." (NPF4 Policy 4; Habitats Regulations)

9. Destroying Our Dark Skies

Massive flashing red lights on top of every turbine will destroy our view of the stars and disorientate birds that fly at night.

In planning terms, the project will cause a permanent loss of Astronomical Amenity and likely kill nocturnal species through phototaxis (fatal attraction to light):

- The project will result in a permanent loss of astronomical amenity, destroying the West Side's appeal as a dark sky destination. (NPF4 Policy 30; LDP Policy PD2)
- The developer has failed to establish a proper nocturnal baseline, ignoring the lethal risk to nocturnal species. (NPF4 Policy 3; Marine Policy Statement)
- The impact of phototaxis (fatal attraction to aviation lighting) on migrating birds has been dangerously underestimated. (NPF4 Policy 4)

10 Cumulative Devastation and Onshore Damage

The offshore turbines and the onshore cables/substations are actually one single project, but treating them separately hides the true damage to our peatlands, machair and crofting land. The developer has also ignored the cumulative impact of this project alongside other future plans for the area (like N2).

In planning terms, this application represents "Project Splitting" and fails to account for the total environmental and carbon cost to the island:

- The assessment fails to account for the total carbon store degradation caused by digging up the Barvas Moor peatlands. (NPF4 Policy 1; NPF4 Policy 5 (Soils))
- Failure to assess impacts on irreplaceable machair habitats at the landfall point constitutes a direct breach of NPF4 Policy 3.
- Given the significant "Information Deficiencies," the developer has failed to prove, "beyond reasonable scientific doubt," that the environment will not be irreparably harmed (Habitats Regulations)
- The project is notably inconsistent with the 2008 AMEC/Lewis Wind Power Ministerial Precedent, which established that the Lewis Peatlands SPA constitutes a "national interest"

carrying a "weight of importance" that outweighed the benefits of energy production; a conservation priority further strengthened by NPF4 Policy 1, which mandates that significant weight be given to the global climate and nature crises in all planning decisions (Ministerial Decision 2008; NPF4 Policy 1).

There are many alternative sites for offshore wind development and no reason for over-riding public interest for choosing this site.

Thank you for your consideration.

ADD YOUR OWN NAME

Member of Public 2407

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: FORMAL OBJECTION - Spiorad na Mara Offshore Windfarm
Date: 07 May 2026 16:16:35
Attachments: [OBJECTION - N4 Spiorad na Mara Offshore Windfarm.pdf](#)

Dear Marine Directorate Licensing Operations Team,

Please find attached my formal objection to the above application, submitted under Section 36 of the Electricity Act 1989 and Section 20 of the Marine (Scotland) Act 2010.

I write as both a former resident of Ness, Isle of Lewis, and as a Principal Health and Social Impact Consultant. My objection addresses fifteen grounds including the adequacy of the Environmental Impact Assessment, the absence of an Island Communities Impact Assessment under the Islands (Scotland) Act 2018, the non-disclosure of the full Social Impact Assessment, and the failure to commission a Health Impact Assessment.

I request confirmation of receipt and ask to be notified of all further procedural steps in this process, including any Public Local Inquiry.

Kind regards,

[REDACTED]

[REDACTED]

Formerly:

[REDACTED]

7 May 2026

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

By email: MD.MarineRenewables@gov.scot

FORMAL OBJECTION – Spiorad na Mara Offshore Wind Farm (Section 36, Electricity Act 1989 / Section 20, Marine (Scotland) Act 2010)

Dear Scottish Ministers,

I write both as a former local resident of Ness, Isle of Lewis, growing up in the same house held in my family for four generations, and as a Principal Health and Social Impact Consultant with 10 years of professional experience in public health, health impact assessment, social impact assessment, and the evaluation of major infrastructure proposals. My professional background informs this objection, and in particular my concerns regarding the absence of a Health Impact Assessment, the serious procedural failings in the Social Impact Assessment process, and the complete failure of the application to address the mental health, cultural wellbeing, and social cohesion dimensions of a development of this scale and character.

I lodge my formal and unequivocal objection to the application by Spiorad na Mara Limited (a subsidiary of Northland Power, 75.5%, and ESB, 24.5%) to construct and operate an offshore wind farm approximately 5–13 kilometres off the west coast of the Isle of Lewis, comprising between 44 and 60 turbines of up to 338 metres in height across a site of 161 km².

Having reviewed the Environmental Impact Assessment Report and all associated application documentation, I submit that the application is procedurally defective, evidentially inadequate, and substantively contrary to national planning and marine policy. It mirrors the fundamental failures that led to the refusal of the Lewis Wind Power application in 2008, the unacceptable scale of industrialisation of a nationally and internationally significant coastal landscape, and does so under a statutory and policy framework that has since grown considerably more demanding in its requirements. I urge the Scottish Ministers to refuse consent.

My objection is organised under the following headings:

1. Adequacy of the Environmental Impact Assessment
2. Assessment of Alternatives
3. Marine Ecology and Protected Species
4. Ornithology and Seabird Impacts
5. Cultural Heritage and Community Identity
6. Social Impacts, Health, and Wellbeing
7. Seascape, Landscape, and Visual Impacts
8. Construction and Pollution Risks
9. Fisheries and Marine Life
10. Onshore Infrastructure: Hidden Impacts
11. Dark Skies and Nocturnal Wildlife
12. Tourism and Economic Impact
13. Equalities Impact Assessment
14. Island Communities Impact Assessment
15. Health Impact Assessment

1. Adequacy of the Environmental Impact Assessment

The Environmental Impact Assessment Report (EIAR) contains critical deficiencies that render it both unreliable and incomplete. Most significantly, the application adopts a flexible 'Project Design Envelope' that omits specific details of turbine dimensions, layouts, and configurations. This ambiguity introduces substantial and irreducible uncertainty, making it impossible to apply a genuine worst-case scenario analysis. The reported impacts may therefore bear no accurate relationship to the development that will actually be built. Both the public and the competent authority are left unable to assess the true environmental implications of what is being consented.

The application is also heavily dependent on mitigation measures, monitoring strategies, and management plans that have yet to be developed. Seeking consent on the basis that environmental harm will be addressed after approval fundamentally undermines the purpose of the EIA regime, which mandates that significant effects and proposed mitigations must be clearly defined before determination. This deferral to post-consent stages is procedurally unacceptable.

There are further significant gaps in baseline data, with methodological limitations and reliance on assumptions rather than site-specific evidence. Conclusions of negligible or non-significant effects are asserted in numerous places without adequate supporting data. Crucially, the cumulative and worst-case impacts cannot

be reliably determined from the information provided. In consequence, the application does not meet the evidential standard required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt, invoking the precautionary principle across multiple impact pathways. The EIA is not fit for purpose and cannot support a lawful determination.

2. Assessment of Alternatives

The application's assessment of alternatives does not satisfy the statutory requirements of the EIA regime. Rather than providing a structured and evidence-based comparison of realistic alternatives, the documentation offers a narrative account of the project's evolution. This does not demonstrate that less harmful options have been genuinely identified, assessed, and rejected in favour of the current proposal for sound, evidenced reasons.

There is no transparent evaluation of alternative offshore locations, reduced development scales, or different turbine configurations. In particular, the application fails to demonstrate that the developer has seriously explored siting turbines further offshore, where visual, ecological, and coastal impacts would be substantially reduced. Given the exceptional sensitivity of the West Lewis coastline, the absence of such analysis means it is impossible to determine whether the current siting represents the least damaging option.

These shortcomings extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternatives have been examined to avoid sensitive receptors, including the active burial grounds at Barvas Cemetery and other places of spiritual significance. The failure to conduct a structured comparative assessment is a material omission. It compromises adherence to National Planning Framework 4 (NPF4) and means the competent authority cannot conclude that the proposal represents a sustainable or policy-compliant solution.

3. Marine Ecology and Protected Species

The assessment of marine ecology and protected species is significantly inadequate. The West Lewis coastal environment is a biologically active and highly sensitive marine system, yet the baseline data is insufficient and the methodologies employed fail to adequately capture species presence, behaviour, and habitat utilisation. The assessment therefore lacks a sound evidential foundation for evaluating potential impacts.

The treatment of otters (a European Protected Species) is particularly deficient. The application does not adequately acknowledge or assess their active use of coastal zones for foraging and movement. The failure to consider their core foraging range and behavioural patterns results in an incomplete assessment of the effects of construction disturbance, noise, and increased activity.

The evaluation of basking sharks is similarly flawed, relying on aerial surveys that introduce significant detection bias under Atlantic weather conditions. Established land-based observations indicate frequent use of these waters by basking sharks, yet this data has not been adequately incorporated. These methodological failures produce conclusions of negligible or non-significant effects that rest on assumption rather than evidence. The uncertainty generated means that adverse effects cannot

be excluded beyond reasonable scientific doubt. The precautionary principle is thereby engaged, and consent cannot lawfully be granted.

4. Ornithology and Seabird Impacts

The ornithological assessment fails to meet the evidential threshold required to confirm no adverse effect on the integrity of designated sites. Seabird populations on the west coast of Lewis are internationally important, and many species are already in severe decline, including Kittiwake and Fulmar. The assessment does not convincingly demonstrate that these populations will be unaffected. Reliance on modelling approaches in the absence of complete baseline data generates results that cannot be relied upon.

The siting of turbines within a recognised migratory corridor is of particular concern, creating a barrier across a primary flight path used by species migrating between the United Kingdom and Iceland. The displacement, collision risk, and habitat loss implications have not been adequately addressed.

A fundamental internal contradiction fatally undermines the assessment's credibility. The developer simultaneously concludes that there are no significant adverse effects on protected species, whilst making a Habitats Regulations derogation case - a legal mechanism that is only available and only warranted where significant harm is acknowledged. This contradiction calls into question the reliability of the entire assessment and suggests its conclusions are not supported by adequate evidence. Taken together with the data gaps and modelling limitations, the standard of beyond reasonable scientific doubt has not been achieved. The precautionary principle is engaged, and a lawful determination in favour of consent cannot be made.

5. Cultural Heritage and Community Identity

The cultural heritage assessment fails fundamentally to engage with the West Lewis coastline as a living cultural landscape. Rather than recognising the dynamic interplay of environment, language, tradition, and community, the assessment treats heritage as a collection of static assets. The practical, social, and spiritual significance of the coastline to the communities who inhabit it is entirely disregarded.

Active burial grounds at Dalmore, Bragar, and Barvas, places of deep and ongoing spiritual significance, are assessed as though they were inert historic features. The assessment fails to engage with their continued use, their centrality to community life, or the impact of the proposed development on their setting and atmosphere. Similarly, the visual and spatial relationship between sites such as the Calanais Standing Stones and the Atlantic horizon, a relationship forged over millennia and inseparable from their meaning, is neither recognised nor assessed. The industrialisation of the seascape would irrevocably sever these connections.

Most seriously, the assessment omits intangible cultural heritage entirely. The Gaelic language, oral traditions, and the living relationship between this community and its coastal environment are not evaluated at all. These are not peripheral considerations: they are the bedrock of the area's cultural identity. Their omission renders any conclusion about cultural impact valueless.

The Gaelic-speaking community of Lewis, to which I belong, possesses a distinct cultural identity with characteristics that align closely with those recognised in international frameworks for Indigenous Peoples. No process of Free, Prior and Informed Consent has been undertaken. This absence calls into question both the validity of the assessment and compliance with established principles of participatory decision-making in matters affecting cultural and environmental interests.

Finally, there has been no Island Communities Impact Assessment under the Islands (Scotland) Act 2018 which is a statutory requirement addressed in detail at Ground 14 below. This omission alone is sufficient to render the determination process unlawful.

6. Social Impacts, Health, and Wellbeing

A critical and deeply troubling procedural flaw runs through the entire application: the Social Impact Assessment (SIA), commissioned by the developer and based on direct engagement with local residents, has not been published. The developer's own consultants held focus groups with communities on the west side of Lewis, and the findings of those focus groups remain withheld from the public and from proper scrutiny. This is wholly unacceptable.

The summaries that are available reveal that local residents are already experiencing measurable levels of stress, anxiety, and distress as a direct result of the scale and proximity of the proposed development. These are not speculative impacts, they are drawn from the developer's own research. Yet the full assessment has not been made available, depriving the public, community bodies, and the competent authority of the ability to scrutinise findings that go to the heart of the development's social acceptability. What has been disclosed indicates that local people associate the development with 'cultural loss', a severe impact that has not been given appropriate weight in the application.

The withholding of the full SIA is not a minor procedural irregularity. It is a material omission from the application that makes a lawful determination impossible. In my professional judgment, no competent authority could properly assess the social and health acceptability of a development of this scale without access to the complete Social Impact Assessment dataset upon which the developer itself has relied. The application does not meet the evidential standards of the EIA regime in this respect, and the Marine Directorate should not proceed to determination until the full SIA is published and a further period for representations is afforded.

From a policy standpoint, the application fails to demonstrate compliance with NPF4's requirements in relation to health and wellbeing. Developments are required to foster positive health outcomes and to mitigate harm. The evidence that is available suggests that adverse effects are already present and have not been fully disclosed. Without the full SIA, adherence to this policy obligation cannot be demonstrated.

7. Seascape, Landscape, and Visual Impacts

The assessment of visual, seascape, and landscape impacts is fundamentally inadequate and does not capture the true scale of change or the exceptional sensitivity of the environment affected. The West Lewis coastline is defined by its

unspoilt Atlantic-facing views, its complete absence of industrial development, and a profound sense of connection to the natural landscape and our heritage. Turbines of 294–338 metres (taller than any structure in Scotland) positioned close to the shoreline would create a dominant and continuous industrial presence, permanently and irreversibly transforming this landscape.

The representation of visual change in the application is insufficient. The turbines would dominate views from residential areas, historic landmarks, and popular coastal locations across the entire western seaboard of Lewis, from Ness to Uig. The assessment does not convey the true significance of this impact within such a sensitive landscape. Evidence indicates that the viewpoints selected may not adequately represent the most sensitive receptors or genuine worst-case scenarios. The extent of visual impact appears to have been systematically understated.

Most significantly, the assessment fails to evaluate the interconnected relationships between landscape, seascape, and cultural heritage. The Calanais Standing Stones and other Scheduled Monuments exist not as isolated features but as elements of a wider cultural landscape whose meaning is inseparable from their relationship to the natural horizon and the sea. By treating these sites as discrete entities, the assessment produces an incomplete and misleading analysis of the impacts on their setting.

The industrialisation of the seascape would shatter these relationships, severing ties to the horizon and the sea that have shaped human experience on Lewis for thousands of years. This constitutes not merely a visual impact but a cultural and spatial harm of the most profound character. The application conflicts directly with NPF4 in its obligation to protect natural environments and historic assets. Given the scale, height, and proximity of the turbines, their presence cannot be mitigated to an acceptable level. The harm is permanent and irreversible.

8. Construction and Pollution Risks

The assessment of construction and pollution risks is materially lacking. No fully developed Construction Environmental Management Plans or Pollution Prevention Plans have been included with the application. Instead, the developer relies on mitigation and contingency measures yet to be created, to be developed after consent is granted. This prevents any meaningful evaluation of their adequacy or effectiveness and is procedurally contrary to the requirements of the EIA regime.

The sensitivity of the receiving environment makes this deficiency particularly serious. The clean coastal waters and vital habitats of the West Lewis coastline are acutely susceptible to sediment disturbance and contamination. The application acknowledges risks including sediment mobilisation and accidental chemical or oil spills from turbine nacelles, yet provides insufficient information on how these will be prevented, controlled, or monitored. The scale, behaviour, and ecological consequences of sediment plumes from seabed disturbance and cable installation have not been adequately modelled.

The absence of detailed emergency response procedures compounds these concerns. By deferring contingency planning to after consent, the developer makes it impossible for the competent authority to assess whether appropriate safeguards are

in place. The application does not demonstrate compliance with policy requirements on environmental protection and water quality. These are not minor omissions. They are fundamental deficiencies that must be remedied before any determination.

9. Fisheries and Marine Life

The assessment of impacts on fisheries and marine life is notably inadequate and does not provide a reliable basis for evaluating the ecological and socio-economic consequences of the proposal. The waters off the West Lewis coast are rich in marine species and support a thriving fishing industry, yet the application fails to demonstrate how these vital uses and habitats will be protected.

A critical assumption pervades the assessment: that fishing activities can be displaced without significant consequence. No substantiated evidence is offered that alternative grounds are available, accessible, or capable of sustaining displaced effort. The risk of overfishing in other areas and broader economic harm to the local fishing fleet has not been evaluated. These are not marginal risks.

The construction phase will generate sustained and high-energy underwater noise from hammer piling over a prolonged period, causing disturbance to marine life across considerable distances. The application acknowledges that a significant proportion of the local bottlenose dolphin population (a European Protected Species) is likely to be disturbed, yet minimises the significance of these effects without adequate supporting evidence.

As with the ornithological assessment, there is a damaging internal contradiction. The application simultaneously asserts negligible impacts on protected species while applying for Habitats Regulations derogation licences that are only required where significant harm is anticipated. This inconsistency is not a drafting error, it is a fundamental failure of analytical integrity that undermines the credibility of the assessment as a whole. The cumulative impacts of habitat disturbance, noise pollution, and fishing displacement have not been properly assessed. The application does not demonstrate alignment with NPF4 or the National Marine Plan.

10. Onshore Infrastructure: Hidden Impacts

The offshore turbines and onshore infrastructure form a single, integrated project; yet they are assessed separately. This fragmented approach systematically obscures the true scale of environmental and socio-economic impact and is contrary to the requirements of the EIA regime, which mandates that all components be considered collectively.

The onshore works involve cabling across protected moorland, excavation through deep peat on Barvas Moor which is an ecologically sensitive and nationally important carbon store, construction of a substation near Stornoway, and access infrastructure traversing machair systems and other protected habitats. None of these impacts has been comprehensively assessed. The disturbance of peatland releases stored carbon, potentially creating a significant carbon debt that directly contradicts the stated purpose of a renewable energy development. The application does not demonstrate that the overall carbon balance of the project is positive.

The routing of infrastructure through active croft land raises issues of land use conflict and legal rights. There is no evidence that necessary consents or processes with crofting communities have been initiated, raising serious questions about the feasibility and lawful delivery of the project. Sensitive habitats including machair systems are under policy protection, yet the application does not demonstrate that impacts have been adequately assessed or that avoidance measures have been considered.

The failure to assess the project in its entirety and to demonstrate protection of peatlands, habitats, and land use interests is contrary to NPF4 and the National Marine Plan. These shortcomings render this element of the application incomplete and incapable of supporting a lawful determination.

11. Dark Skies and Nocturnal Wildlife

The West Lewis coastline is recognised for its exceptionally dark skies, which are of intrinsic importance to the area's environmental quality, cultural identity, and growing astro-tourism economy. The proposed development would introduce permanent red aviation warning lighting, visible across the western horizon for distances of 30 kilometres or more, creating a continuous and intrusive 'wall of light' effect across what is currently one of the darkest natural horizons in the British Isles. The application contains no assessment whatsoever of the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This is a complete and inexcusable omission.

Equally serious is the absence of any evaluation of impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting through phototaxis, which causes disorientation and dramatically increases collision risk. No lighting impact assessment or phototaxis study has been undertaken. The ornithological assessment relies principally on daytime survey data, entirely failing to capture nocturnal activity patterns and the associated risks. Kittiwakes, which may forage and migrate at night, are also left without evaluation in this respect.

The absence of site-specific night-time data creates a material evidential gap. It is impossible on the information provided to ascertain whether protected species or designated sites would suffer adverse effects from the proposed lighting regime. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, engaging the precautionary principle. This omission is contrary to NPF4 and undermines the broader assessment of landscape and seascape impacts, of which the night-time environment forms an integral part.

12. Tourism and Economic Impact

The evaluation of tourism impacts is severely inadequate and fails to assess the economic and social consequences for one of the Isle of Lewis's most critical economic sectors. Tourism on Lewis is built upon the wild Atlantic coastline, near-pristine landscapes, dark skies, and the distinctive sense of remoteness and cultural depth that the island offers. The application itself acknowledges that 86% of visitors are drawn by the scenery, yet it provides no quantified analysis of how

large-scale offshore infrastructure would affect visitor numbers, visitor behaviour, or the economic contribution of the sector.

The scale of what is at risk is considerable. Tourism revenue on Lewis has grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. No modelling has been undertaken to assess whether the industrialisation of the seascape would reduce Tourism Gross Value Added or harm the economic resilience of the island. Without such modelling, it is impossible to determine whether the development would produce a net economic benefit or cause lasting harm to an established and growing sector.

The absence of a Dark Skies Assessment compounds this failure. Dark sky tourism and astro-tourism are identified growth sectors for the Outer Hebrides, and the proposed aviation lighting would directly degrade the asset upon which this sector depends. The failure to assess this is a significant evidential gap. Given the island's limited economic diversity, the cumulative impact on employment, local businesses, and community sustainability could be severe and long-lasting.

The absence of an Island Communities Impact Assessment, addressed in detail at Ground 14, means that the economic vulnerabilities specific to an island community have not been formally assessed as required by the Islands (Scotland) Act 2018. The application does not demonstrate compliance with NPF4 regarding economic impact or net benefit. This is a further material deficiency.

13. Equalities Impact Assessment

The Scottish Ministers, as the consenting authority, are subject to the public sector equality duty under Section 149 of the Equality Act 2010, which requires that they pay due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between persons who share a protected characteristic and those who do not.

I am not satisfied that an adequate Equalities Impact Assessment (EqIA) has been completed and published in connection with the Ministers' decision-making functions regarding this application. The communities most severely affected by this development include elderly residents for whom the cultural and physical landscape of Lewis is inseparable from their sense of identity and psychological wellbeing; individuals with disabilities who are less able to relocate or adapt their economic activities; the Gaelic-speaking community, for whom the landscape constitutes a living cultural heritage with recognised linguistic and cultural characteristics amounting to a protected characteristic under race; and economically vulnerable households disproportionately dependent on the tourism sector.

These groups share protected characteristics under the Equality Act 2010 and the differential impacts upon them require specific, documented consideration. Island rurality exacerbates inequality experienced on account of these characteristics: issues relating to transport, access to services, housing, and economic opportunity, all already strained on Lewis, may be rendered acutely worse by a development of this scale.

I formally request confirmation that a full EqlA has been completed and published prior to any determination. In the absence of such confirmation, I submit that the granting of consent would be contrary to the Ministers' statutory obligations.

14. Island Communities Impact Assessment

The Islands (Scotland) Act 2018 imposes a statutory duty on Relevant Authorities, including the Scottish Ministers, to have regard to island communities in the exercise of their functions. Under Sections 7 and 8 of that Act, where a decision is likely to have an effect on an island community that is significantly different from its effect on other communities, a full Island Communities Impact Assessment (ICIA) must be completed and published before the decision is taken.

It is beyond serious argument that this application, if consented, would have profoundly different and disproportionate effects on the communities of Lewis compared to any mainland or urban community. The Isle of Lewis is geographically remote, economically fragile, and culturally distinct. Its communities face specific and well-documented challenges arising from distance, limited connectivity, fuel poverty substantially above the Scottish average, restricted economic diversity, and the absence of economic alternatives available elsewhere. The consequences of industrialising the western coastline - on tourism revenue, on cultural identity, on property values, on mental health, and on social cohesion - are wholly unlike anything that would be experienced by communities in other parts of Scotland.

To my knowledge, no ICIA has been completed or published in relation to this application. The cultural heritage section of the application itself identifies this as a procedural shortcoming, yet the omission has not been remedied. This is not a technicality. The ICIA is a statutory requirement. Its absence means the competent authority is legally unable to discharge its duties under the Act, and any consent granted in the absence of a compliant ICIA would be susceptible to legal challenge.

I formally demand that a full Island Communities Impact Assessment be completed and published before any consent is granted, and that an adequate period for representations be afforded to the public and to community bodies on Lewis following its publication.

15. Health Impact Assessment

No standalone Health Impact Assessment (HIA) or dedicated human health assessment has been commissioned or published in connection with this application. The Social Impact Assessment, which, as noted at Ground 6, has itself not been published in full, references health and wellbeing in general terms but cannot substitute for a comprehensive and independent HIA. As a Principal Health and Social Impact Consultant, I can confirm that what has been provided falls materially short of the standard of health impact assessment that would be expected as a matter of professional best practice for a development of this scale, proximity, and cultural sensitivity. Community respondents to the EIA scoping process explicitly called for an independent medical body to advise on the human health impacts of the wind turbines and onshore infrastructure. There is no indication that this request has been acted upon.

A comprehensive and independent Health Impact Assessment is required as a matter of urgency, and must address all of the following dimensions:

(a) Environmental Health

The potential consequences of low-frequency noise and infrasound generated by turbines of this unprecedented scale and proximity to inhabited coastline must be assessed by an independent medical body. The EIA scoping response submitted by local community body Urras Sgìre Oighreachd Bharabhais specifically called for a noise impact assessment evaluating the risks of low-frequency noise and infrasound to human and non-human life, given the scale of the turbines and their closeness to shore. This critical gap remains unfilled.

(b) Economic Health Determinants

Economic insecurity is one of the most powerful social determinants of health. The HIA must assess the consequences for household incomes and financial security of tourism decline; the effects of construction disruption on local businesses and livelihoods; whether community benefit mechanisms adequately address the already-elevated fuel poverty rates on the Western Isles; and the long-term effects of any reduction in property values for coastal residents.

(c) Transport and Access to Healthcare

The construction of a development of this scale will place severe pressure on the limited road, port, and ferry infrastructure of the Isle of Lewis. Road damage from heavy construction traffic, disruption to ferry services, and pressure on housing from an influx of construction workers will have direct and measurable health consequences. Access to healthcare, already severely constrained by geographic remoteness, may be further compromised during construction and operational phases. These risks must be formally assessed.

(d) Mental Health, Cultural Wellbeing, and Social Cohesion

This is the most critically neglected dimension of any health assessment conducted to date. There is a substantial and growing body of evidence from psychology, public health, environmental humanities, and anthropology documenting the profound relationship between landscape, place attachment, cultural identity, and mental health. For communities with deep-rooted connections to a particular landscape, its irreversible industrial transformation is not an aesthetic inconvenience - it is a form of cultural bereavement with documented psychological consequences.

The communities of the west side of Lewis are among the most culturally cohesive in the British Isles. The Gaelic language, the shared patterns of crofting and seafaring, bonds of kinship, and the daily lived relationship with a coastline of exceptional beauty and meaning are not incidental. They are the foundation of community identity, social cohesion, and collective mental wellbeing. The developer's own (unpublished) SIA identifies 'cultural loss' as a community concern. This finding demands formal, independent and robust assessment, not suppression.

The HIA and SIA must address: the psychological impacts of irreversible landscape loss on residents with strong place attachment; the consequences of community division generated by the development process; the impact on the Gaelic language community, given documented links between language vitality, cultural continuity, and mental wellbeing; the effects on elderly residents for whom the landscape carries particular autobiographical and existential significance; the consequences for young people's sense of belonging and motivation to remain in their communities; and the risk of community fragmentation and loss of social cohesion arising from a development that has demonstrably polarised local opinion.

The failure to commission a comprehensive, independent Health Impact Assessment or human health assessment addressing all of the above represents a fundamental deficiency in the evidence before the Scottish Ministers. In my professional opinion, the scope I have described above reflects established best practice in health impact assessment for major infrastructure proposals affecting island and rural communities with strong cultural identities. It is not an aspirational standard - it is the minimum required to reach an informed and defensible determination. Consent must not be granted until such an assessment has been completed, published, and subjected to full public scrutiny.

Conclusion and Formal Requests

The grounds of objection set out above are individually serious and collectively overwhelming. The application is procedurally defective, evidentially incomplete, and substantively incompatible with the statutory tests and national policy framework applicable to a determination of this kind. It repeats the core errors of past large-scale wind energy applications in this landscape while doing so under a policy regime that has grown more demanding, not less, in its requirements.

Scotland has a duty to pursue the energy transition. It has an equal duty to ensure that this transition is not imposed upon island communities who carry the costs and bear none of the political weight. The west coast of Lewis is not a sacrifice zone. It is a nationally and internationally significant landscape, a living Gaelic cultural heartland, and a fragile economic ecosystem that cannot absorb permanent industrial transformation without lasting and irreversible harm.

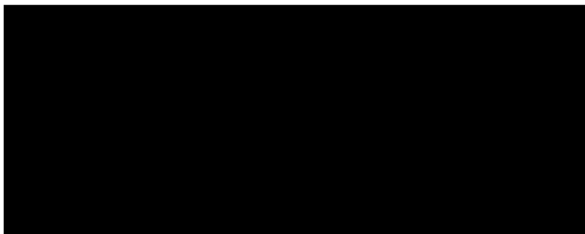
I formally request that the Scottish Ministers:

- (a) REFUSE consent under Section 36 of the Electricity Act 1989 and all associated marine licences under Section 20 of the Marine (Scotland) Act 2010;
- (b) Convene a full Public Local Inquiry to give proper scrutiny to the profound and well-evidenced concerns raised by affected communities and statutory consultees;
- (c) Confirm that a full Equalities Impact Assessment has been completed and published in accordance with Section 149 of the Equality Act 2010, or direct that one be completed before any determination is made;
- (d) Direct that a full Island Communities Impact Assessment be completed and published under the Islands (Scotland) Act 2018 before any determination is made, with an adequate period for public representations thereafter;

- (e) Require the developer to publish the full and unredacted Social Impact Assessment before any further procedural steps are taken;
- (f) Require the commissioning of a comprehensive, independent Health Impact Assessment addressing environmental, economic, transport, mental health, cultural wellbeing, and social cohesion impacts, with findings published for public scrutiny; and
- (g) Apply the precautionary principle across all impact pathways where the evidential threshold of beyond reasonable scientific doubt has not been met.

I am prepared to provide further written or oral evidence in support of this objection and formally request to be notified of all further procedural steps in this process, including any Public Local Inquiry.

Regards,

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7 May 2026

Member of Public 2408

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: MD-00011742 & MD-00011743 Objection
Date: 07 May 2026 14:53:53
Attachments: [Objection MD-00011742 MD-00011743 Spiorad na Mara limited Spiorad na Mara Offshore Wind Farm - Isle of \[REDACTED\]](#)

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

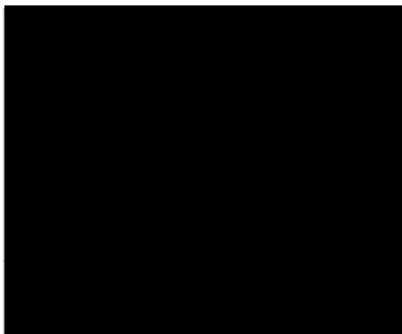
I forma y object to the above app cat on as t contravenes p ann ng po c es and gu dance.

P ease f nd attached my object on etter.

K nd regards

[REDACTED]

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



7th 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, geodiversity 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,'*

I watched a social media interview with First Minister, John Swinney this morning where I felt he touched on the intangible qualities of an island coastline, and the importance of tourism to the Scottish economy, as a whole. He talked about Shetland and the north of the Scottish mainland, but could easily be describing the west coast of Lewis. Luisa Hendry @scottishgeologist asked him about the potential for investing more in Geotourism in Scotland and he replied:

"There is much more we could do to understand the significance of our geology and what it tells us about our story. I was up in Unst, the most Northerly island in the Shetland Isles, I was up seeing the Spaceport, and I climbed up the top of this gantry from which the satellites are going to be launched and you know when you look north there's just like open sea, it is just the open beyond, and I turned round and looked down along the coast of Unst and it just struck me and of course I enjoy, I love Scotland's countryside and its natural environment, but I looked at these cliff edges and I just thought to myself what have you seen, what have you experienced, what have you endured as that ocean pummels into you every single day and it's been going on for - well you could tell me Luisa, better than I could articulate - how long its been going on

for, and there is something incredibly powerful and significant about, well there's just one example that comes to mind for me and I suppose, there will be aspects of our tourism proposition today which wasn't always the way it is just now, so if you think about. I happened to be up in Golspie at the weekend and there are all the signs for the North Coast 500, well 10, 15 years ago the North Coast 500 was not advertised as a tourism proposition but somebody just decided to do that and you've now got lots of people engaging with the North Coast 500, it doesn't come without its problems, but it's an example of how you can use the natural assets of the country to turn people's heads which I suppose is the point you are putting to me Louisa, but I am very keen to explore all aspects of tourism because it is such a significant part of our economic offering as a country."

I have earned my living from a tourist accommodation business in Uig for the last 14 years and talked to many visitors to the island over this time. If the Developers surveyed visitors to the Outer Hebrides on why they choose to visit I'm sure the positive impact on their wellbeing of being immersed in nature and unspoilt natural coastal landscapes would feature heavily. This proposal doesn't just effect the local population it will be detrimental to the rest of the Scottish and UK population who regularly visit the Isle of Lewis and particularly the west coast, to relieve the stress of urban life and to get away from the buildings, concrete, traffic and industrial infrastructure of large towns and cities.

Scotland's economy and the Isle of Lewis and Harris can't afford to lose this natural asset.

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.'*

Hidden Impacts on Mental Health:

I am concerned about the long term impacts on the mental health and well being of people living in the vicinity of the proposed off shore wind farm and land based infrastructure.

By not disclosing the full Social Impact Assessment (SIA) data, the developer has prevented the community from seeing the true health risks: I therefore object to the non-disclosure of social impact data, which prevents a transparent assessment of the project's risks. (NPF4 Policy 14; Aarhus Convention). The proposal will have a documented adverse impact on mental health and wellbeing, which is a material violation of NPF4 Policy 14. (NPF4 Policy 14 (Health and Wellbeing))

Potential for Depopulation

A major factor in choosing to live on the west coast of the Isle of Lewis is the unspoilt nature of the local environment. It's why I personally moved to the island 30 years ago. I fear that the large scale industrial infrastructure proposed at sea and on land could lead to further population decline in an area which is already suffering from depopulation.

Risks to Bird Life and Marine Mammals

Most of my leisure time is spent out on our small boat in the sea around Loch Roag. I've had the pleasure of observing the rich bird and marine life in the area for many years including rafts of Manx Shearwaters, and breeding colonies of razor bills, guillemots, terns, great black backed gulls, lesser black backed gulls, grey seals and common seals (to name just a few of the numerous species). Bottlenose dolphins, common dolphins, basking sharks and minke whales are a common sight in the waters just off the Uig coast. I've even observed a humpback whale. The coastal waters, numerous small islets and larger nearby island groups

such as the Flannan Isles provide a unique and irreplaceable habitat which is of national significance to Scotland and the UK as a whole.

I am extremely concerned that the risks to biodiversity in the waters around Uig and the west coast of Lewis has not been adequately considered by the developers and object to the proposal on the following basis:

The developer's own Habitats Appraisal Derogation Case proves that the project cannot be completed without damaging protected nature sites. (Habitats Regulations; NPF4 Policy 3)

The proposal fails the Precautionary Principle, as there is no evidence beyond reasonable scientific doubt that local bird populations will survive. (National Marine Plan Policy GEN 9)

I object on the grounds that the project poses an unacceptable risk to SPA-integrity (Special Protection Areas). (NPF4 Policy 4; Birds Directive)

"The application contains significant methodological deficiency by using biased aerial surveys that ignore established land-based basking shark data." (National Marine Plan Policy GEN 9)

"An Appropriate Assessment cannot conclude 'no adverse effect' given that high-energy piling will disturb 28% of the local bottlenose dolphin population." (NPF4 Policy 4; Habitats Regulations)

"The requirement for European Protected Species (EPS) licenses proves that environmental impacts are not 'negligible' as claimed." (NPF4 Policy 3; EPS Regulations)

The project fails the NPF4 Policy 3 mandate, which requires a measurable net gain for biodiversity, not just mitigation. (NPF4 Policy 3)

The developer has failed to establish a proper nocturnal baseline, ignoring the lethal risk to nocturnal species. (NPF4 Policy 3; Marine Policy Statement)

The impact of phototaxis (fatal attraction to aviation lighting) on migrating birds has been dangerously underestimated. (NPF4 Policy 4)

The Environmental Impact Assessment Report (EIAR) is deficient because it lacks site-specific data and fails to assess a realistic worst-case scenario:

The application represents a deficient EIAR because it contains significant gaps in baseline data regarding local species. (National Marine Plan; NPF4 Policy 1)

The developer has made a failure to apply a realistic worst-case scenario, meaning the true impacts remain unknown. (Electricity Works (EIA) (Scotland) Regulations 2017)

The use of the Rochdale Envelope principle in this sensitive location is inappropriate as it masks the scale of environmental harm. (NPF4 Policy 4; Marine Scotland Guidance)

I object to the reliance on post-consent mitigation, as the effectiveness of these measures cannot be scrutinized now. (NPF4 Policy 3; Habitats Regulations)

The proposal suffers from procedural uncertainty, as key protection plans have been deferred until after permission is granted. (Planning and Infrastructure Act 2025)

The pre-determination of mitigation without evidence-based results fails the test of a robust planning application. (NPF4 Policy 1)

Cumulative Devastation and Onshore Damage

The offshore turbines and the onshore cables/substations are actually one single project, but treating them separately hides the true damage to our peatlands, machair and crofting land. The developer has also ignored the cumulative impact of this project alongside other future plans for the area (like N2).

This application represents "Project Splitting" and fails to account for the total environmental and carbon cost to the island:

The assessment fails to account for the total carbon store degradation caused by digging up the Barvas Moor peatlands. (NPF4 Policy 1; NPF4 Policy 5 (Soils))

Failure to assess impacts on irreplaceable machair habitats at the landfall point constitutes a direct breach of NPF4 Policy 3.

Given the significant "Information Deficiencies," the developer has failed to prove, "beyond reasonable scientific doubt," that the environment will not be irreparably harmed (Habitats Regulations)

The project is notably inconsistent with the 2008 AMEC/Lewis Wind Power Ministerial Precedent, which established that the Lewis Peatlands SPA constitutes a "national interest" carrying a "weight of importance" that outweighed the benefits of energy production; a conservation priority further strengthened by NPF4 Policy 1, which mandates that significant weight be given to the global climate and nature crises in all planning decisions (Ministerial Decision 2008; NPF4 Policy 1).

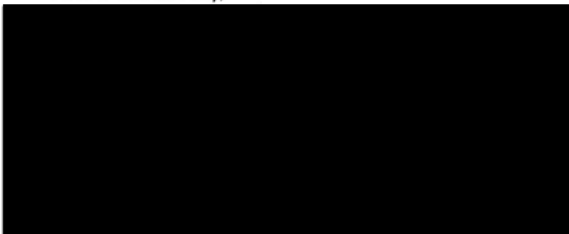
Energy Security

I have held back from formally objecting to this proposal which has sickened me for several years because I understand the desperate need for the UK to be able to access secure energy sources and find alternatives to fossil fuels and international imports of oil and gas. However I can't reconcile this need with the scale of the proposed off shore wind farm, the close proximity to the land, and the detrimental impacts it will have on nature and the local 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, marine and birdlife, heritage setting, and the tourism economy.

I respectfully request that this application is rejected.

Yours sincerely,



2409

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis - EIA Section 36 Consent and Marine Licence Application - Consultation
Date: 07 May 2026 13:41:12
Attachments: [N4_Final.docx](#)
[N4_Final.pdf](#)

To whom it may concern

Please find attached my submission with regard to **MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis - EIA Section 36 Consent and Marine Licence Application - Consultation.**

A word and PDF version are attached.

Regards

[REDACTED]

Name: [REDACTED]

Address: [REDACTED]

Email: [REDACTED]

7 May 2026

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

For the attention of the Scottish Ministers.

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

Dear Scottish Ministers,

I write to formally object to the application by Spiorad na Mara Limited to construct and operate an offshore wind farm off the west coast of the Isle of Lewis.

I was born and brought up in Lewis and after 25 years away, 22 of these in New Zealand, I have returned to Lewis. It is simply, one of the last unspoilt landscapes in the world.

If allowed, this development will create significant and life-changing impacts due to the extent of the development: 60 wind turbine generators, 338m in height and situated only 5km to 13km from the coastline.

The impacted coastline, and Lewis in general, is steeped in a traditional way of life enjoyed by both its residents and the many tourists attracted to the area, due to its natural beauty, culture including Gaelic language, wildlife, fauna and historic sites of interest.

This is not the first time this island has been subject to proposed large-scale renewable energy development. Thankfully, on the previous occasion sense prevailed and the project was scrapped.

I have a number of areas of specific areas of concern:

Lack of Community Engagement

There was no consultation with the Lewis community prior to the Crown Estate Scotland identifying and leasing of the N4 area for development. The plan was imposed upon residents without consent.

As a research consultant with years of experience managing stakeholder and community communications for large infrastructure projects I am appalled at the blatant lack of community consultation.

The stated position of support and lack of objection [as stated by the local authority] did not reflect what was being discussed in the communities I live and work in. I, along with a community group, undertook an online community survey which returned an outstanding **88% of respondents against** the development as it stands. This survey was completed to international best practise guidelines; the data was cleaned with duplicate responses and IP addresses outwith the Western Isles removed.

The misrepresentation of community opinion by the local authority is a significant breach of our communities' rights under existing planning legislation, which alone would justify suspension of any consenting until a public enquiry is undertaken.

Furthermore, there are many problematic elements to the N4 proposal in its current format, with many Scottish Government policy statements breached and disregarded. Specifically my concerns are:

1. Incomplete Information

The developer's paperwork is full of gaps. They are using a 'design envelope', which means they aren't telling us the exact size or number of turbines yet, making it impossible to know the real damage.

In planning terms, the Environmental Impact Assessment Report (EIAR) is deficient because it lacks site-specific data and fails to assess a realistic worst-case scenario:

- The application represents a deficient EIAR because it contains significant gaps in baseline data regarding local species. (National Marine Plan; NPF4 Policy 1)
- The developer has made a failure to apply a realistic worst-case scenario, meaning the true impacts remain unknown. (Electricity Works (EIA) (Scotland) Regulations 2017)
- The use of the Rochdale Envelope principle in this sensitive location is inappropriate as it masks the scale of environmental harm. (NPF4 Policy 4; Marine Scotland Guidance)

2. 'Fix it Later' Promises

The developer is asking for permission now and promising to figure out how to fix environmental damage later. We can't trust a plan that hasn't been written yet.

In planning terms it is problematic to rely on post-consent mitigation. The authorities cannot judge if the project is safe if the solutions are not provided before the decision is made:

- I object to the reliance on post-consent mitigation, as the effectiveness of these measures cannot be scrutinised now. (NPF4 Policy 3; Habitats Regulations)
- The proposal suffers from procedural uncertainty, as key protection plans have been deferred until after permission is granted. (Planning and Infrastructure Act 2025)
- The pre-determination of mitigation without evidence-based results fails the test of a robust planning application. (NPF4 Policy 1)

3. Economic Damage to Lewis

The island bears all the costs while the high-paying jobs and profits go off-island. Local businesses may lose staff to short-term wind farm jobs. Particular impact on the tourism sector is insufficient. In planning terms, the project violates Community Wealth Building policies and risks cannibalising our local workforce:

- The proposal creates a significant socio-economic imbalance and facilitates the benefit export of wealth away from the island. (NPF4 Policy 25; National Marine Plan Policy GEN 2)
- The EIAR fails to model how the "high magnitude of change" to the seascape will reduce Tourism Gross Value Added (GVA) (NPF4 Policy 30; LDP Policy ED1)
- The lack of a compliant Island Communities Impact Assessment (ICIA) means the vulnerability of the vital tourism sector hasn't been legally evaluated (Islands (Scotland) Act 2018; NPF4 Policy 4)
- Lack of assessment of industry cannibalisation, where the project causes labour displacement from our vital care and tourism sectors. (NPF4 Policy 30)
- The development fails the NPF4 Policy 25 mandate for Community Wealth Building. (NPF4 Policy 25)

4. Ignoring our Culture

The assessment ignores our Gaelic language, our traditions tied to the sea, and how we actually use our landscape today.

In planning terms, the developer has failed to assess intangible heritage and the living landscape, violating the requirement to protect the unique cultural identity of our island communities:

- The assessment fails NPF4 Policy 7 by ignoring the intangible and living heritage of the West Side community. (NPF4 Policy 7; Historic Environment Policy for Scotland (HEPS))
- There has been an inadequate Island Communities Impact Assessment (ICIA) regarding the impact on Gaelic culture and local traditions. (Islands (Scotland) Act 2018)
- The project fails to respect the Cultural Landscape as a whole, treating historic sites as

isolated objects rather than a living environment. (LDP Policy EH1; NPF4 Policy 7)

5. Hidden Impacts on Mental Health

A report showing that local residents are suffering from high levels of stress and anxiety was kept out of the main public documents.

In planning terms, by not disclosing the full Social Impact Assessment (SIA) data, the developer has prevented the community from seeing the true health risks:

- I object to the non-disclosure of social impact data, which prevents a transparent assessment of the project's risks. (NPF4 Policy 14; Aarhus Convention)
- The proposal will have a documented adverse impact on mental health and wellbeing, which is a material violation of NPF4 Policy 14. (NPF4 Policy 14 (Health and Wellbeing))

6. Fishing, Marine Life, and Protected Species

The developer's study of West Lewis waters is dangerously incomplete, not taking into account the full impact on the local fishing industry and marine life.

In planning terms the proposal fails to provide a robust evidence base for marine mammals and ignores the displacement of the local fishing fleet:

- "The application contains significant methodological deficiency by using biased aerial surveys that ignore established land-based basking shark data." (National Marine Plan Policy GEN 9)
- "The proposal fails NPF4 Policy 11 and NMP Policy GEN 4 as it provides no evidence that alternative fishing grounds are available to prevent industry cannibalisation." (NPF4 Policy 11; NMP Policy GEN 4)
- "The requirement for European Protected Species (EPS) licenses proves that environmental impacts are not 'negligible' as claimed." (NPF4 Policy 3; EPS Regulations)

7. Risks to Bird Life

This area is a vital feeding ground and a major highway for migrating birds. The developer is trying to bypass nature laws because they know the project will likely harm protected species.

In planning terms, the developer has already filed a Derogation Case, which is a legal loophole used when a project admits it will definitely damage a protected area:

- The developer's own Habitats Appraisal Derogation Case proves that the project cannot be completed without damaging protected nature sites. (Habitats Regulations; NPF4 Policy 3)
- The proposal fails the Precautionary Principle, as there is no evidence beyond reasonable scientific doubt that local bird populations will survive. (National Marine Plan Policy GEN 9)
- I object on the grounds that the project poses an unacceptable risk to SPA-integrity (Special Protection Areas). (NPF4 Policy 4; Birds Directive)

8. Failure to Help Nature and Pollution Risks

In Scotland, just doing less harm isn't enough anymore. Big projects are legally required to leave nature in a better state than they found it.

In planning terms, the developer has failed the mandatory Enhancement test required by NPF4:

- The project fails the NPF4 Policy 3 mandate, which requires a measurable net gain for biodiversity, not just mitigation. (NPF4 Policy 3)
- The proposal offers no genuine biodiversity enhancement and fails to contribute to our local Nature Network. (NPF4 Policy 3(a))
- Failure to provide detailed CEMPs or Pollution Prevention Plans prevents a robust assessment.
- "An Appropriate Assessment cannot conclude 'no adverse effect' given that high-energy piling will disturb 28% of the local bottlenose dolphin population." (NPF4 Policy 4; Habitats Regulations)

9. Destroying Our Dark Skies

Massive flashing red lights on top of every turbine will destroy our view of the stars and disorientate birds that fly at night.

In planning terms, the project will cause a permanent loss of Astronomical Amenity and likely kill

nocturnal species through phototaxis (fatal attraction to light):

- The project will result in a permanent loss of astronomical amenity, destroying the West Side's appeal as a dark sky destination. (NPF4 Policy 30; LDP Policy PD2)
- The developer has failed to establish a proper nocturnal baseline, ignoring the lethal risk to nocturnal species. (NPF4 Policy 3; Marine Policy Statement)
- The impact of phototaxis (fatal attraction to aviation lighting) on migrating birds has been dangerously underestimated. (NPF4 Policy 4)

10. Cumulative Devastation and Onshore Damage

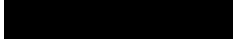
The offshore turbines and the onshore cables/substations are actually one single project, but treating them separately hides the true damage to our peatlands, machair and crofting land. The developer has also ignored the cumulative impact of this project alongside other future plans for the area (like N2).

In planning terms, this application represents "Project Splitting" and fails to account for the total environmental and carbon cost to the island:

- The assessment fails to account for the total carbon store degradation caused by digging up the Barvas Moor peatlands. (NPF4 Policy 1; NPF4 Policy 5 (Soils))
- Failure to assess impacts on irreplaceable machair habitats at the landfall point constitutes a direct breach of NPF4 Policy 3.
- Given the significant "Information Deficiencies," the developer has failed to prove, "beyond reasonable scientific doubt," that the environment will not be irreparably harmed (Habitats Regulations)
- The project is notably inconsistent with the 2008 AMEC/Lewis Wind Power Ministerial Precedent, which established that the Lewis Peatlands SPA constitutes a "national interest" carrying a "weight of importance" that outweighed the benefits of energy production; a conservation priority further strengthened by NPF4 Policy 1, which mandates that significant weight be given to the global climate and nature crises in all planning decisions (Ministerial Decision 2008; NPF4 Policy 1).

There are many alternative sites for offshore wind development and no reason for over-riding public interest for choosing this site.

Thank you for your consideration.



From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection to Spiorad Na Mara OffShore Wind Farm.
Date: 07 May 2026 07:48:14

I write to you with our objection to the the proposed Spiorad Na Mara Offshore Wind Farm, Isle of Lewis.

My wife and moved to the Western Isles 20 years ago after visiting the Islands on many occasions.
We were drawn here because of the outstanding natural beauty and cultural engagement that has been lost in most places throughout the UK.
We have enjoyed the unspoiled beauty of the land and the sea as active outdoor enthusiasts.

We have subsequently built businesses in sustainable tourism to share our own experience of the islands, whilst giving us a modest income in return.
If this proposed wind farm and its infrastructure goes ahead, all this will be lost.

We have conducted our own questionnaire survey with our self catering guests, with regards to the environmental damage that that will occur if the proposed wind farm and infrastructure proceeds and the the response is quite clear.....

“ Our guests will not return to a place that has been blighted by these monstrous wind turbines and the environmental damage that will be caused to this place”

As a result my wife and I have already made the decision that if this proposal goes ahead, we will close our businesses and move away from the islands.

If this proposal goes ahead, the environment, island life, locals livelihoods and the impact of increased worker population will change all of the above for the worse, forever!

There will be no going back when the damage is done.

This proposal is not for the benefit of the environment or the islands, it is purely based on Greed.

We strongly object to the Spiorad Na Mara Offshore Wind Farm Proposal, Isle of Lewis.

[REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: MD-00011742 & MD-00011743 Spiorad na Mara Limited.
Date: 06 May 2026 22:34:30
Attachments: [MD-00011742 & MD-00011743 Spiorad na Mara Limited. .pdf](#)

Hello,

Here is our objection letter.

I would be greatly appreciative of confirmation that this objection has been received and on the next steps in the review process.

Thank you for your time

Kind regards,

[REDACTED]

FORMAL OBJECTION — NORTH AND NEW SHAWBOST COMMON GRAZINGS

To: Marine Directorate Licensing Operations Team Re: Section 36 Consent Application — Spiorad na Mara Offshore Wind Farm Application references: 00011742 & 00011743

[REDACTED]

[REDACTED]

06/05/26

This objection is submitted on behalf of the North and New Shawbost Common Grazings Committee, acting in its statutory capacity under the Crofters (Scotland) Act 1993. It is submitted with the support of the Grazings Committee and reflects the view of the shareholders of the North and New Shawbost Common Grazings.

We object to the above application on the following grounds.

THE DEVELOPER'S CONDUCT TOWARD THIS COMMON GRAZINGS DEMONSTRATES A PATTERN OF DELIBERATE AVOIDANCE OF COMMUNITY ENGAGEMENT

During the pre-application phase of this project, Spiorad na Mara Limited, through its solicitors, wrote to the North and New Shawbost Grazings Committee proposing the installation of a meteorological mast. This communication took the form of a letter accompanied by a diagram. No meaningful engagement was offered and no opportunity was provided for the Grazings Committee or its shareholders to discuss the proposal, raise concerns, or negotiate terms.

<https://www.stornowaygazette.co.uk/business/battle-lines-set-over-spiorad-na-mara-4587146>

The Grazings Committee voted unanimously to refuse consent for the meteorological mast on the common grazings.

The developer's response to this unanimous refusal was to place the meteorological mast on nearby private land, specifically in order to avoid the requirement to obtain the consent of the Grazings Committee.

The choice to circumvent the statutory rights of a crofting community body rather than engage with it, demonstrates, at the earliest stage of this project's development, that the applicant's approach to community engagement was to find ways to proceed without it, ignoring the legal land rights of crofters that have protected us from exploitation for 140 years.

THIS CONDUCT IS INCONSISTENT WITH THE PRE-APPLICATION CONSULTATION REQUIREMENTS OF NPF4 AND THE ELECTRICITY WORKS REGULATIONS

National Planning Framework 4 requires that community engagement in the planning process be early, collaborative, meaningful and proportionate. The Scottish Government's own guidance is explicit that engagement should not be a public relations exercise but a genuine attempt to understand and respond to community concerns.

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 require that the environmental impact assessment process be informed by engagement with affected communities and statutory consultees.

The North and New Shawbost Common Grazings Committee is a statutory body established under the Crofters (Scotland) Act 1993. It has legally recognised functions in the management and regulation of common grazings land that lies within and adjacent to the area affected by this project, including the onshore cable corridor and landfall area. It represents the interests of crofting shareholders whose livelihoods, land use, legal rights and community identity are directly affected by this development.

Deliberate repositioning of infrastructure onto private land to avoid the need for consent, does not constitute meaningful pre-application consultation with this statutory body.

THE DEVELOPER'S APPROACH IS CONTRARY TO NPF4 POLICY 11 AND THE ISLANDS (SCOTLAND) ACT 2018

NPF4 Policy 11 requires that development proposals maximise net economic impact including local and community socio-economic benefits. A developer that responds to a unanimous community refusal by finding a way to proceed without community consent cannot credibly demonstrate that it is maximising benefit to the local community.

The Islands (Scotland) Act 2018 places a statutory duty on Scottish Ministers to have regard to island communities in the exercise of their functions, and requires that an Island Communities Impact Assessment be conducted where a development is likely to have significantly different effects on island communities. Crofting communities are quintessentially island communities within the meaning of that Act. The North and New Shawbost Common Grazings represents exactly the kind of community the Act exists to protect. The developer's documented failure to engage meaningfully with this statutory crofting body is a dimension of the broader failure to conduct a compliant Island Communities Impact Assessment.

THE CONDUCT TOWARD THIS COMMON GRAZINGS IS CONSISTENT WITH A WIDER PATTERN OF DELIBERATE AVOIDANCE

The conduct described above is not an isolated incident, it is consistent with a pattern of behaviour that runs through the entire pre-application process for this project, identified in the applicant's own Focus Group Summary Report, in which local people described the consultation process as more of a public relations exercise than a genuine attempt to engage with community concerns. It is consistent with a pre-application consultation conducted in English in a community where Gaelic is the daily vernacular, and with a Social Impact Assessment deliberately deferred until after consent, and with the submission of this planning application at the busiest time of year for crofters, the lambing season, without any apparent regard for the practical impact on the community it was supposed to have consulted.

The pattern extends beyond the meteorological mast. The proposed cable landfall location is sited on a small parcel of private land that is surrounded on multiple sides by crofts and common grazings. This is the same strategy applied twice, the deliberate identification and use of a small piece of private land specifically to avoid the legal and community engagement obligations that would arise from working on crofting land or common grazings. Taken together, the siting of the meteorological mast and the siting of the cable landfall reveal a consistent and deliberate approach: when community consent is required, find private land; when a statutory crofting body must be engaged, find a way around it.

Scottish Ministers should be in no doubt that what is presented in this application as community consultation has been systematically shaped, from the earliest stages of the project, by a strategy of minimum engagement with the crofting communities most directly affected.

CROFTING IS INSEPARABLE FROM THE LIVING CULTURAL HERITAGE OF THE GAELIC COMMUNITY AND HAS NOT BEEN ASSESSED

Crofting on the westside of Lewis is the material foundation of the Gaelic-speaking community: the system of land tenure, seasonal labour, shared resource management and community organisation through which the culture, language and social fabric of these villages has been sustained across generations. The common grazings are the physical expression of a communal relationship with the landscape that is as old as the communities themselves, managed collectively through statutory Grazings Committees that are a product of that cultural tradition.

The EIAR's failure to assess the living intangible cultural heritage of the Gaelic-speaking communities of the westside of Lewis is a fundamental deficiency within this application and is therefore also a failure to assess the cultural significance of crofting itself. The two are inseparable. The oral traditions, the seasonal practices, the place names, the community rituals that constitute the intangible cultural heritage of these villages are lived through the croft, the grazing, the burn, the machair and the sea. There is no indication in the EIAR that this has been understood.

The North and New Shawbost Common Grazings Committee submits that the failure to assess the cultural significance of crofting as an expression of Gaelic community life is a material gap in the environmental information before Scottish Ministers.

THE AGRI-ENVIRONMENT CLIMATE SCHEME COMMITMENTS OF WESTSIDE GRAZINGS COMMITTEES HAVE NOT BEEN ASSESSED, AND THE ORNITHOLOGICAL SIGNIFICANCE OF THIS AREA IS EXCEPTIONAL

A number of Grazings Committees on the westside of Lewis, including the North and New Shawbost Common Grazings, are active participants in the Scottish Government's Agri-environment Climate Scheme (AECS). These commitments reflect a formal, publicly funded agreement between the crofting community and the Scottish Government to manage the land in ways that protect and enhance biodiversity, in particular the wading bird populations for which the westside of Lewis is internationally significant.

The ornithological significance of this area, at the community level rather than simply the offshore level, has not been adequately assessed in the EIAR. Shawbost is one of the most important breeding grounds for corncrake in the entire United Kingdom. The corncrake (*Crex crex*) is a Species of Principal Importance under the Nature Conservation (Scotland) Act 2004, listed as a priority species under the UK Biodiversity Action Plan, and its recovery in the Western Isles represents one of the most significant conservation successes in recent Scottish natural heritage management, a success built in significant part on the land management practices of crofting communities participating in agri-environment schemes precisely like those operated by westside Grazings Committees.

The common grazings and adjacent crofting land at Shawbost also support breeding lapwing, curlew and golden plover, all Red-listed species in the UK, all Species of Principal Importance under the Nature Conservation (Scotland) Act 2004, and all species whose breeding success is directly dependent on the undisturbed management of the crofting landscape in which they nest. These species are ground-nesting and acutely sensitive to disturbance and noise during the breeding season.

The EIAR does not assess the impact of this development on these terrestrial and crofting-edge bird populations. The construction programme will generate sustained disturbance — vessel noise, construction activity, increased traffic and human presence — across a five-year period encompassing multiple breeding seasons. For corncrake, lapwing, curlew and golden plover, disturbance during the breeding season is a direct threat to recruitment and to the long-term viability of populations whose recovery has been achieved through decades of careful land management by the very crofting communities this development has failed to engage with.

Furthermore, the Scottish Government's own AECS agreements with westside Grazings Committees represent a public commitment to the conservation of these species in this landscape. A development that undermines the conditions necessary for the fulfilment of those agreements, by generating sustained disturbance during the breeding season across a multi-year construction period, places those agreements, and the public investment they represent, at risk. The EIAR contains no assessment of this conflict and no mitigation is proposed.

THE DEVELOPMENT DOES NOT COMPLY WITH SCHEDULE 9 OF THE ELECTRICITY ACT 1989

Section 38 and Schedule 9 of the Electricity Act 1989 impose a specific duty on electricity generators in respect of the natural environment. Schedule 9 paragraph 1(1) requires that a licence holder or applicant shall:

"(a) shall have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest, and of protecting sites, buildings, structures, objects or equipment of architectural, historic or archaeological interest; and (b) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings, structures or objects."

The flora and fauna of the westside villages of Lewis, including the marine mammal populations, the SPA-qualifying seabird populations, the protected migratory species, the European otter, the Atlantic salmon, the corncrake, the curlew, the lapwing and the golden plover, are precisely the fauna that Schedule 9 requires the applicant to have regard to preserving and conserving, and to mitigate effects upon.

The unprecedented scale of this development makes any theoretical assessment of its impact on these species and habitats inherently uncertain. With turbines of 338 metres, a 140 km² array, a five-year construction programme and a 35-year operational life, the cumulative effects on the wildlife of this coastline cannot be modelled with the precision that the Habitats Regulations and Schedule 9 together demand. The EIAR acknowledges uncertainty across multiple species assessments. Where that uncertainty exists, Schedule 9's requirement to have regard to the desirability of conserving flora and fauna demands a precautionary approach, yet the developer concludes repeatedly that 'no significant effect' is likely when they acknowledge in their application, that their own documents have baselines built on incomplete data.

THE SPLIT OF THE APPLICATION MAKES HOLISTIC ASSESSMENT IMPOSSIBLE AND PLACES ONSHORE DETERMINATION IN THE HANDS OF AN AUTHORITY WHOSE IMPARTIALITY IS COMPROMISED

The applicant will submit consent applications for the offshore and onshore elements of this project separately. The consequences of this split are particularly acute for the communities represented by this Grazings Committee and for the westside crofting communities more broadly.

The offshore element to be determined by Scottish Ministers on the basis of the environmental information currently before them is materially incomplete. The onshore element that will pass through and beside crofting land and common grazings, is yet to be submitted and will be determined by Comhairle nan Eilean Siar as the local planning authority.

Comhairle nan Eilean Siar is the same body that, in its response to the first Draft Sectoral Marine Plan in 2020, told the Marine Directorate without any supporting evidence that the community of Lewis strongly supported offshore wind development at this location. (Draft Sectoral Marine Plan for Offshore Wind Energy, Response 279771074) It is the same body who, in this response, was motivated by its desire to secure the HVDC interconnector for Lewis. It made an assertion of community support during a Covid consultation when meaningful community engagement was effectively impossible and that the Marine Directorate accepted without question, and on the basis of which the N4 option was retained in the Sectoral Marine Plan and ultimately leased to Northland Power.

The shareholders of the North and New Shawbost Common Grazings, and the wider westside community, have no confidence that the Comhairle can act as an impartial planning authority in respect of the onshore works for a project whose inclusion in the Sectoral Marine Plan it actively and unilaterally promoted, without community mandate, for reasons that are on the public record. This means that the westside crofting communities face the prospect of having the most intrusive onshore elements of this development determined by the very body that told the Scottish Government, without asking them, that they supported it.

Scottish Ministers cannot properly discharge their responsibilities under the Electricity Act 1989, the Habitats Regulations, NPF4, or the Islands (Scotland) Act 2018 on the basis of an offshore-only assessment, knowing that the onshore element will be determined separately by an authority whose position on this project is already a matter of public record. The split application creates a gap in democratic accountability.

CONCLUSION — CALL FOR A PUBLIC INQUIRY

The North and New Shawbost Common Grazings Committee respectfully urges Scottish Ministers to refuse this application.

We associate ourselves fully with the wider environmental, cultural and community objections submitted in relation to this application. We draw particular attention to the conduct of the developer toward this Grazings Committee and toward the westside crofting community more broadly, a conduct characterised from the outset by the systematic identification of ways to proceed without community engagement.

We draw further attention to the structural impossibility of assessing this project honestly while its onshore and offshore elements are divided between two separate consenting authorities, one of which has already publicly committed to a position on the project's desirability without community mandate.

The democratic deficit that underlies this entire process began with the inclusion of the N4 option in the first Draft Sectoral Marine Plan for Offshore Wind Energy. It was a decision made on the assertion of community support that was never evidenced, and never put to the communities most directly affected. It continued with the award of the seabed lease to Northland Power. It was compounded by the approval of a 1.8 gigawatt interconnector; infrastructure sized on the presumption that a 900 megawatt offshore wind farm would receive planning consent, before any planning application had been submitted and before any community had been asked. And it has

culminated in a planning application submitted during the lambing season, with a Social Impact Assessment deferred until after consent, without a compliant Island Communities Impact Assessment, and with a developer that has twice used small parcels of private land to avoid its obligations to the crofting community on whose doorstep it proposes to build.

This sequence of decisions, from the Draft Sectoral Marine Plan to the seabed lease to the interconnector to the planning application, raises questions about the integrity of the process and how it came to be proposed at all. And about the role of Comhairle nan Eilean Siar in asserting, without evidence, that a community supported a project it had never been asked about. There is the question of whether the Marine Directorate properly discharged its duties when it accepted that assertion without scrutiny. And whether the communities of the westside of Lewis were ever genuinely given a voice in decisions that will define the character of their coastline, their culture and their way of life.

The North and New Shawbost Common Grazings Committee therefore calls upon Scottish Ministers to order a full Public Inquiry into the process by which the N4 option was included in the Draft Sectoral Marine Plan for Offshore Wind Energy, the basis on which the seabed lease was awarded, and the adequacy of community engagement at every stage of that process. Only a Public Inquiry, with the power to compel disclosure of documents and to hear evidence under oath, can establish the full facts of how this community came to be presented with a fait accompli of this magnitude, and whether those responsible for the decisions that led to it properly discharged their duties to the people most affected by them.

The communities of the westside of Lewis are crofters, Gaelic speakers, fishermen and stewards of one of the most extraordinary natural and cultural landscapes in Europe. They deserve to be treated as such. A Public Inquiry would be the first step in doing so.

[Redacted], On behalf of the North and New Shawbost Common Grazing's Committee [Redacted]

06/05/26

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 06 May 2026 22:13:40

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 overriding 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: I object to the mode of renewable energy - why are no other less impactful types being explored? There are much less destructive ways to generate renewable energy that are not being explored. Why is there no dialogue with communities on the mode of renewables? I object to the harm and industrialisation of wildlife, fragile ecologies and communities. I disagree with the financial viability of maintenance and the lack of benefit to communities. The implementation and maintenance involves far less environmentally friendly processes negating the intended benefit. Areas that have been staunchly protected by many established environmental bodies are now being casually touted simply as areas for development. I disagree with the disregard and minimising of the objections by the impacted communities. Instead of 'Not in my back Yard' it's 'Lets find another way'. 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 [REDACTED]

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 06 May 2026 22:20:44

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.

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

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

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

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

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

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

My further objection points:

Huge visual impact, low community benefit. Too big, too close, non-beneficial and totally disproportionate for the local 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,

A black rectangular box redacting the signature of the person.



From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 06 May 2026 22:20:23

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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 do not agree with the impact this will have for the views of our island, it does not benefit islanders in any way and hold nothing for the future of our young people

The peatland and environmental damage will be catastrophic

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