

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: Re: Formal objection to Spiorad na Mara Offshore Wind Farm
Date: 24 June 2026 16:10:08
Attachments: [N4 objection.pdf](#)
[ATT00001.htm](#)
[image003.png](#)
[ATT00002.htm](#)

As requested in the Scottish government's email below, I forward a copy of our Objection in a pdf format.

Best regards,

[REDACTED]



**In the service
of Scotland**



Integrity



Inclusivity



Innovation



Collaboration



Kindness

email:
Landli
Mobile

[Redacted]

6 May 2026

Director of Marine Scotland
The Scottish Government
St Andrews House
Regent Road
Edinburgh
EH1 3DG

Dear [Redacted]

OBJECTION to the proposed Scotwind development at N4 (Northern Power and ESB)

We strongly object to the proposal by Northland Power/ESB or any other company to build an industrial windfarm near the shore of the north west side of Lewis. It beggars belief that the Scottish Government, egged on no doubt by Comhairle nan Eilean Siar, should lease seabed so close to land. You will remember no doubt CNES' enthusiasm for an earlier windfarm that would have covered the whole of the north of the island with giant wind turbines. That proposal was sensibly turned down by ministers. Where has their common sense gone now?

As usual, the proposal has got this far without anything like adequate public consultation. Why have there been no meetings in Community Centres on the West Side to discuss the issues and sound out the feelings of the local population?

And as usual, the Scottish Government is disregarding one of its own plans as being inconvenient. The 2021 Annual Report on the National Islands Plan promised to promote genuine community empowerment at the local level enabling decisions to be taken as close as possible to where their impact will be felt. The process so far is the very antithesis of this promise.

We accept that any proposal to build a windfarm will be controversial. However, the Scottish Government's proposal to build this windfarm, without a proper and meaningful consultation with the people who will be most affected by it, is nothing short of an abuse of power.

Yours sincerely,

[Redacted]
Former long term residents of Valtos, Uig, Isle of Lewis

My address: [REDACTED]

Postcode: [REDACTED] Email: [REDACTED] Date: 07/05/2026

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

Community Opposition and lack of Community Empowerment: The Community Opinion Survey on the Spiorad na Mara Offshore Wind Farm Development (N4) published by www.emg-lewis.co.uk in April 2026 found that 88% of residents from Ness to Uig opposed the N4 development. Approving this project against such overwhelming local consensus would directly contravene the National Islands Plan's commitment to community empowerment. **The National Islands Plan, page 65, para. 5** *'Our vision is for islanders to be empowered to shape their own priorities, build their futures, and protect what makes their communities unique.'*

My further objection points:

Following are my Higher English, Higher Gàidhlig, and National 5 Geography assignments, it should be obvious from how much time and effort I put in to researching the impacts of this proposed development that I feel very strongly on its negative impact on my community and my culture. Please show me the courtesy of reading each of these, if you cannot read the Gàidhlig one please translate it.

Thank you

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

I respectfully request that this application is rejected.

Yours sincerely,

Signature:(type your name here)*

[REDACTED]

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



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

From: [Redacted]
To: [MD Marine Renewables](#)
Subject: Formal Objection Submission – Spiorad na Mara Offshore Wind Farm (Applications MD-00011742 and MD-00011743)
Date: 07 May 2026 23:12:18
Attachments: [Formal Objection to Spiorad na Mara Offshore Wind Farm - \[Redacted\]](#)

Dear Sir/Madam,

Please find attached my formal objection to the proposed Spiorad na Mara Offshore Wind Farm and associated Marine Licence and Section 36 applications MD-00011742 and MD-00011743.

I respectfully request that this submission is registered as a formal representation within the determination process and placed before Scottish Ministers prior to any decision being made in relation to the applications.

My objection is submitted following review of the applicant's Environmental Impact Assessment Report (EIAR), Planning Statement, Marine Licence supporting documentation and associated appendices.

The attached document sets out concerns relating to, among other matters:

- Habitats Regulations and ecological uncertainty;
- Seascape, landscape and visual impact;
- Cultural heritage and community identity;
- Cumulative industrialisation and community sustainability;
- Human health, wellbeing and environmental disturbance;
- Deferred assessment and reliance upon post-consent mitigation;
- Meaningful public participation and accessibility of the consultation process.

I do not object to renewable energy development in principle. However, I do not believe that this proposal, at this scale and in this location, has demonstrated environmental acceptability with sufficient certainty.

I would be grateful if you could confirm receipt of this objection and that it has been accepted as part of the formal consultation process.

Yours faithfully,

[Redacted]

FORMAL OBJECTION

Spiorad na Mara Offshore Wind Farm

Applications MD-00011742 and MD-00011743

Document Reference	████████/OBJ/2026/01
Objector	████████████████████
Address	██
Residence Context	Mother and Resident of West Lewis
Email	██
Date	07 May 2026

Submitted as a formal representation requesting refusal of consent, or alternatively no determination until the further information and reassessments requested in this document have been provided.

EXECUTIVE SUMMARY

This document constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm and associated Marine Licence and Section 36 applications MD-00011742 and MD-00011743.

The objection is based upon detailed review of the applicant's Environmental Impact Assessment Report (EIAR), Planning Statement, Marine Licence supporting documentation and associated appendices.

I do not object to renewable energy in principle. My objection relates to this proposal, in this location, at this scale, and on the basis of the significant adverse effects, unresolved uncertainties and policy conflicts identified within the applicant's own assessment material.

The proposed development comprises turbines of unprecedented scale, reaching approximately 338 metres in height and located approximately 5-13 km offshore from the west coast of Lewis. Due to the scale and proximity of the development, the proposal cannot reasonably be compared with more distant offshore wind developments elsewhere.

In my view, the applications fail to demonstrate with sufficient certainty that the development can proceed without unacceptable adverse effects upon landscape, seascape, biodiversity, cultural heritage, fisheries, tourism, community wellbeing and island resilience.

The principal grounds of objection are summarised as follows:

- The offshore and onshore elements are being progressed through separate consent regimes despite forming one integrated development, preventing full assessment of cumulative and interconnected impacts.
- The proposal would industrialise a nationally important coastal and cultural landscape through turbines of unprecedented scale and proximity to shore.
- The applicant's own EIAR acknowledges potentially significant effects upon seascape, landscape, tourism, cultural heritage and visual receptors across extensive areas of Lewis.

- The proposal would adversely affect the setting, experience and cultural significance of heritage assets and the wider Gaelic cultural landscape, including the setting of the Callanish (Calanais) Standing Stones.
- The submission of a Habitats Regulations derogation case demonstrates unresolved ecological conflict and significant uncertainty regarding protected species and designated sites.
- The applications rely excessively upon future mitigation, post-consent controls and deferred assessment rather than demonstrating environmental acceptability at the point of determination.
- Important aspects of seabed disturbance, drilling, cable installation and geotechnical conditions remain unresolved, with key assessments relying upon proxy data and future surveys.
- The proposal would contribute to cumulative industrialisation across Lewis when considered alongside existing, consented and proposed renewable energy developments including Stornoway Wind Farm, Druim Leathann and Uisenis.
- The proposal risks long-term and potentially irreversible harm to tourism, dark skies, landscape character, fisheries, cultural identity and wider social sustainability within a fragile island community.
- The scale, complexity and volume of the application material raises legitimate concerns regarding meaningful public participation and accessibility of the consultation process.

TABLE OF CONTENTS

Section	Title
1	Habitats Regulations Derogation and Failure to Demonstrate Least Harmful Alternative.
2	Significant Seascape, Landscape and Visual Harm
3	Biodiversity, Protected Species and Ecological Uncertainty
4	Failure to Assess the Whole Project Adequately
5	Incomplete Site-Specific Assessment and Deferred Design
6	Tourism, Community Resilience and Cumulative Industrialisation
7	Cultural Heritage, Gaelic Landscape and Community Identity
8	Human Health, Noise and Wellbeing
9	Over-Reliance on Future Mitigation and Post-Consent Control
10	Meaningful Public Participation and Accessibility of the Application
11	Planning Balance and Conclusion
Appendix A	EIAR and Planning Documentation References
Appendix B	Relevant Policy Framework
Appendix C	Community and Local Context
References	Bibliography and Supporting References

1. HABITATS REGULATIONS DEROGATION AND FAILURE TO DEMONSTRATE LEAST HARMFUL ALTERNATIVE

The submission of a Habitats Regulations derogation case is highly significant and should attract substantial weight within the determination process.

Such derogation mechanisms are exceptional and are only engaged where adverse effects on the integrity of protected European sites cannot be ruled out through ordinary Habitats Regulations assessment.

The existence of the derogation case therefore represents an acknowledgement within the applicant's own assessment that the proposal has the potential to adversely affect internationally important ecological interests and protected species.

In such circumstances, the precautionary principle should apply robustly.

The legal and policy framework governing derogation cases requires particularly careful consideration of alternatives and proportionality. However, the applications do not convincingly demonstrate that less harmful alternatives have been rigorously explored or discounted.

The Environmental Impact Assessment process is intended not merely to justify a preferred development option, but to rigorously examine whether materially less harmful alternatives exist. In circumstances where internationally important ecological interests and nationally important landscapes may be adversely affected, the burden rests upon the applicant to demonstrate with clear evidence why a development of this scale and proximity to shore is necessary in this specific location rather than at greater offshore distance or through reduced scale and density.

Given the exceptional scale of the proposed turbines and their unusually close proximity to shore, it is reasonable to expect particularly robust justification as to why alternative offshore siting options at greater distance from the coast would not represent a less environmentally harmful solution.

This includes:

- Alternative offshore locations;
- Increased distance from shore;
- Reduced turbine scale or density;
- Alternative layouts or configurations capable of reducing ecological and landscape impacts.

Given the unprecedented scale of the proposed turbines and their close proximity to an environmentally sensitive coastline, the applications fail to demonstrate why this specific configuration represents the least environmentally damaging option reasonably available.

This concern is heightened by acknowledged uncertainty surrounding:

- Collision risk modelling;
- Displacement effects;
- Cumulative ornithological impacts;
- Long-term population modelling;
- Protected species interactions.

Where uncertainty remains regarding internationally protected ecological interests, that uncertainty should not be resolved in favour of development.

2. SIGNIFICANT SEASCAPE, LANDSCAPE AND VISUAL HARM

The proposed turbines would be among the largest offshore wind structures in the world and would be located unusually close to shore within an environment of exceptionally high landscape sensitivity.

The west coast of Lewis is characterised by:

- Open Atlantic horizons;
- Sparse built development;
- Dark skies;
- Strong intervisibility between land and sea;
- A high degree of perceived naturalness and remoteness.

The proposal would fundamentally alter these defining characteristics.

The applicant's own EIAR includes extensive visual assessment material comprising 42 representative viewpoints and approximately 2.8 GB of photomontage and visualisation material across Appendix 18.6 alone.

The scale of this visual dataset itself demonstrates the extensive geographic influence of the development.

The proposal would affect:

- Settlements;
- Roads;
- Beaches;
- Tourism viewpoints;
- Heritage settings;
- Recreational areas;
- Residential amenity;
- Designated landscapes.

The applicant acknowledges potential effects upon the Special Landscape Qualities of the South Lewis, Harris and North Uist National Scenic Area.

The turbines would not appear as distant background features but as a dominant industrial presence across substantial parts of the western seascape.

The effects identified are not temporary or easily reversible, but would fundamentally alter the character and experience of the west coast of Lewis for at least the operational lifetime of the development and potentially beyond.

The impacts would also continue at night through aviation and navigation lighting, materially affecting the dark-sky qualities of the area.

Photomontages should not be treated as neutral evidence of acceptability. It is widely recognised within planning practice that such visualisations tend to under-represent the true scale and prominence of large infrastructure due to:

- Restricted field of view;
- Distance compression;
- Reduced depth perception;
- Idealised atmospheric conditions.

The actual lived visual experience is therefore likely to be materially more intrusive than represented within the applicant's visual material.

Taken together, the evidence demonstrates substantial and long-term industrialisation of the west coast seascape.

3. BIODIVERSITY, PROTECTED SPECIES AND ECOLOGICAL UNCERTAINTY

The proposal raises substantial concerns regarding ornithology, marine mammals, fish ecology, benthic habitats and wider ecosystem integrity.

The applicant's own EIAR identifies multiple impact pathways including:

- Collision risk;
- Displacement;
- Barrier effects;
- Underwater and airborne noise;
- Habitat disturbance;
- Sediment mobilisation;
- Cumulative ecological pressure.

The assessment relies heavily upon linked modelling chains involving:

- Survey data;
- Abundance modelling;
- Collision risk modelling;
- Displacement assumptions;
- Population viability modelling.

Each stage introduces uncertainty.

Small variations in assumptions relating to avoidance rates, flight behaviour or displacement may materially alter predicted impacts.

Long-term population modelling extending over several decades inherently carries substantial uncertainty.

Particular concern arises regarding White-tailed Eagles.

Local observation and community knowledge indicate regular White-tailed Eagle activity within the Croir and Little Bernera coastal area, including repeated hunting behaviour along the coastline.

White-tailed Eagles are recognised as highly sensitive species within wind farm assessment and are known to utilise extensive coastal and marine foraging ranges extending well beyond nesting locations.

It is not clear that local ecological knowledge and observed behavioural patterns have been fully integrated into the assessment process.

Where internationally protected species and designated sites may be affected, uncertainty should not be resolved in favour of development.

4. FAILURE TO ASSESS THE WHOLE PROJECT ADEQUATELY

The applicant confirms that separate applications are being made for the Offshore Project and the Onshore Transmission Works.

This represents a significant weakness within the assessment framework.

The offshore generating station, export cables, HDD works, landfall infrastructure and onshore transmission components are not independent developments in practical terms, but interdependent elements of one integrated project.

However, substantial aspects remain subject to separate applications, future refinement and later-stage assessment.

The applications confirm that:

- Final turbine positions are not fixed;
- Aspects of cable routing and HDD infrastructure remain unresolved;
- Further geotechnical investigations will occur post-consent;
- Additional mitigation and management plans are deferred until later stages.

This creates material uncertainty regarding the full cumulative effects of the project and risks piecemeal decision-making.

The environmental acceptability of the Offshore Project cannot properly be determined in isolation from the full impacts of the associated onshore infrastructure.

5. INCOMPLETE SITE-SPECIFIC ASSESSMENT AND DEFERRED DESIGN

I object to the granting of Marine Licences on the basis that important site-specific information remains incomplete.

The supporting documentation confirms that:

- Drilling may be required for WTG and Offshore Substation Platform foundations;
- Horizontal Directional Drilling will be required at landfall;
- Extensive permanent deposits below Mean High Water Springs are proposed, including substantial quantities of steel, concrete, rock, gravel, concrete mattresses and cabling.

This represents a major industrial intervention within a sensitive marine environment.

Importantly, the applications acknowledge that sediment sampling was not undertaken at final turbine, transmission cable or HDD exit pit locations because final layouts remain unresolved.

The supporting documentation further confirms that much of the seabed was unsuitable for physical sampling due to hard substrates including rock, boulders and cobbles, with soft sediment data subsequently used as a proxy for wider seabed conditions.

For a development of this scale, this level of uncertainty is unacceptable.

Key impacts relating to:

- Foundation drilling;
- Sediment mobilisation;
- Contaminant release;
- Seabed disturbance;
- Cable protection;
- HDD works;
- Cumulative construction effects;

These impacts cannot be robustly assessed until final layouts and full geotechnical evidence are available.

The applications therefore rely excessively upon assumptions, proxy datasets and future post-consent assessment.

Environmental acceptability has not been demonstrated with sufficient certainty at the point of determination.

6. TOURISM, COMMUNITY RESILIENCE AND CUMULATIVE INDUSTRIALISATION

Tourism forms a major component of the Western Isles economy and is fundamentally dependent upon landscape, seascape, cultural heritage and environmental quality.

The applicant's own socio-economic assessment acknowledges the importance of tourism and recognises that perceived changes to landscape and seascape character may influence visitor behaviour.

The west coast of Lewis derives economic value precisely from qualities of naturalness, remoteness and environmental integrity.

These qualities are central to both local wellbeing and long-term economic resilience.

The cumulative effects of the proposed development must also be considered alongside other existing, consented and proposed renewable energy developments across Lewis, including Stornoway Wind Farm, Druim Leathann and Uisenis, together with associated transmission infrastructure.

While each project may individually be assessed within separate applications, the combined effect is a progressive industrialisation of the island environment and erosion of the landscape qualities upon which tourism, environmental distinctiveness and community identity depend.

The cumulative effect is not simply visual change, but the progressive reclassification of the west coast of Lewis from a predominantly natural and cultural landscape into an increasingly industrialised energy landscape.

The cumulative impact upon residents is not experienced as isolated developments assessed within separate technical chapters, but as an interconnected pattern of industrial change affecting:

- Landscape character;
- Visual amenity;
- Dark skies;
- Ecological integrity;
- Community perception of place.

There is also concern regarding environmental justice and the growing concentration of industrial-scale infrastructure within particular rural and coastal communities.

The landscapes of west Lewis should not be regarded as expendable simply because they are geographically remote or sparsely populated.

Their environmental, cultural and community value is fundamental to the identity and long-term sustainability of the islands as a whole.

7. CULTURAL HERITAGE, GAELIC LANDSCAPE AND COMMUNITY IDENTITY

The west coast of Lewis is not merely a visual landscape but a living cultural environment closely connected to:

- Gaelic language;
- Crofting;
- Fishing;
- Oral tradition;
- Place-names;
- Archaeology;
- Religious observance;
- Community identity.

The proposal would introduce industrial-scale infrastructure into the setting of culturally significant landscapes and heritage assets for a minimum operational period of approximately 35 years.

The applications give insufficient weight to intangible cultural heritage and the relationship between communities and their coastal environment.

Particular concern arises regarding the setting and experiential value of heritage assets including the Callanish (Calanais) Standing Stones, where significance derives not only from the monument itself but from its relationship with an open Atlantic horizon and surrounding undeveloped landscape.

The applications also give insufficient consideration to the continuing importance of traditional community life and cultural rhythms within parts of Lewis.

The prospect of prolonged industrial construction activity extending across weekends and Sundays further contributes to concern that the proposal has not been adequately grounded in the social and cultural realities of the communities most directly affected.

8. HUMAN HEALTH, NOISE AND WELLBEING

The Offshore Airborne Noise assessment confirms that there is currently no offshore-specific legislative framework governing offshore airborne noise and therefore relies upon onshore guidance including ETSU-R-97.

This creates material uncertainty regarding the adequacy of the assessment methodology for a quiet island environment characterised by low baseline noise levels and high receptor sensitivity.

The Human Health chapter acknowledges that health and wellbeing may be affected through:

- Noise;
- Visual change;
- Environmental disturbance;
- Socio-economic effects;
- Amenity loss;
- Stress and anxiety.

As a mother of a young child and someone considering the long-term future of my family within the islands, I am concerned about the potential effects of prolonged exposure to tonal, repetitive and low-frequency sound disturbance within a quiet rural environment.

Recent research into large-scale wind turbine infrasound suggests that conventional A-weighted assessment methods may not fully capture low-frequency propagation characteristics or amplitude-modulated effects associated with modern turbine designs.

While scientific understanding continues to evolve, there remains increasing scientific uncertainty regarding the potential for low-frequency disturbance to contribute to sleep disruption, stress and reduced wellbeing, particularly within quiet rural environments.

The local population also includes a significant elderly demographic and other vulnerable residents.

Given the acknowledged uncertainty surrounding long-term exposure effects, the precautionary principle should apply.

9. OVER-RELIANCE ON FUTURE MITIGATION AND POST-CONSENT CONTROL

The EIAR relies heavily upon:

- Future mitigation plans;
- Management plans;
- Monitoring;
- Post-consent controls;
- Embedded mitigation assumptions.

Many important matters are deferred until after consent.

This approach does not provide sufficient certainty at the point of determination.

A consent decision should not rely upon assumptions that unresolved issues will subsequently be controlled through future plans or licensing conditions.

The decision-maker must be satisfied now that the proposal is environmentally acceptable.

The applications fail to demonstrate this with sufficient certainty.

10. MEANINGFUL PUBLIC PARTICIPATION & ACCESSIBILITY OF THE APPLICATION

The scale, complexity and volume of the application material raises legitimate concerns regarding the effectiveness of public participation within the consultation process.

The Environmental Impact Assessment and supporting documentation comprise many thousands of pages of highly technical material developed over a period of several years with access to specialist consultants, modelling tools and legal expertise.

By contrast, local communities have been afforded a comparatively limited period within which to review, understand and respond to a complex and evolving proposal of exceptional scale.

This issue is particularly significant within geographically dispersed island communities characterised by:

- Limited access to specialist planning or environmental expertise;
- An ageing population;
- Varying levels of digital accessibility;
- Finite community capacity to engage with highly technical documentation.

The extensive volume of material submitted — including large visual datasets, extensive appendices and interrelated technical assessments — creates a risk that significant impacts become obscured within the complexity of the documentation rather than clearly understood by affected communities.

The applicant's own consultation material acknowledges extensive engagement activity over multiple years. However, meaningful public participation requires more than the procedural availability of information. Meaningful participation requires not merely theoretical access to documentation, but realistic capacity for affected communities to understand, interrogate and respond to material of exceptional technical complexity. It requires that affected communities are provided with a genuinely accessible and proportionate opportunity to understand the likely consequences of development proposals of this scale and duration.

This concern is reinforced by the timing of the consultation period alongside wider national election activity, which may reasonably have reduced public awareness and engagement capacity within affected communities.

This concern is further heightened by the fact that the submission deadline coincides directly with Scottish Parliamentary election day on 07 May 2026, during a period in which Parliament has been dissolved and many elected representatives are no longer formally operating in their full representative capacity pending the outcome of the election. Automatic responses received from MSP offices during this period confirm that constituency functions and parliamentary representation are materially affected. In practical terms, this reduces the ability of affected residents and communities to seek guidance, representation and democratic support in relation to a proposal of exceptional scale and complexity.

In the context of a proposal with potentially irreversible effects upon landscape, environment, cultural heritage and community character extending over several decades, the effectiveness and accessibility of the consultation process should attract substantial weight within the determination process.

11. PLANNING BALANCE AND CONCLUSION

While the proposal may contribute toward national renewable energy targets, national policy support for renewable energy does not create a presumption in favour of development irrespective of environmental consequence.

In this case, the scale, proximity, uncertainty and cumulative effects of the proposal give rise to substantial and long-term adverse impacts which have not been shown to be outweighed by the asserted public benefits of the development.

These concerns engage the requirements of National Planning Framework 4, including Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), Policy 14 (Design, Quality and Place) and Policy 23 (Health and Safety), together with the wider objectives of Scotland's National Marine Plan and National Islands Plan.

The issue before decision-makers is not whether renewable energy development should occur in Scotland, but whether this particular proposal, at this scale and in this location, has demonstrated environmental acceptability with sufficient certainty. In my view, it has not.

The applications fail to demonstrate with sufficient certainty that the proposal can proceed without unacceptable effects upon:

- Landscape and seascape character;
- Cultural heritage and Gaelic landscape;
- Biodiversity and protected species;
- Tourism and fisheries;
- Community wellbeing and island resilience.

The effects identified are not temporary or easily reversible, but would fundamentally alter the character and experience of the west coast of Lewis for at least the operational lifetime of the development and potentially beyond.

Unlike many forms of development, the transformation of seascape character, dark-sky conditions and community perception associated with infrastructure of this scale may not be readily reversible even following eventual decommissioning.

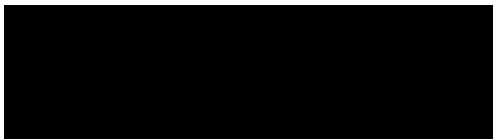
While the operational lifespan of the project may be finite in engineering terms, the transformation of landscape character, community perception and cultural relationship with place may not be meaningfully reversible within the lifetime of affected communities.

For the reasons set out above, it is respectfully submitted that applications MD-00011742 and MD-00011743 fail to satisfy the requirements of the applicable planning, marine and environmental assessment framework and should therefore be refused.

If consent is not refused outright, no determination should be made until:

1. The offshore and onshore elements are assessed together as one integrated project;
2. Final turbine layouts and infrastructure details are fixed;
3. Full site-specific geotechnical and sediment evidence is provided;
4. Cumulative effects are reassessed;
5. Further meaningful consultation is undertaken with affected west Lewis communities.

Yours faithfully,



APPENDIX A - EIAR AND PLANNING DOCUMENTATION REFERENCES

Document / Material	Relevance
Planning Statement	Policy balance, consenting framework and planning justification
Marine Licence Application - Generation Supporting Document	Permanent deposits, drilling, sediment sampling, geotechnical uncertainty
Marine Licence Application - Transmission Supporting Document	Cable infrastructure, HDD works, permanent deposits and deferred geotechnical analysis
Chapter 3 - Project Description	Scale, layout envelope, turbine parameters and project components
Chapter 6 - Alternatives	Alternative siting, scale, design and layout considerations
Chapter 18 - Seascape, Landscape and Visual Impact Assessment	Visual effects, landscape character, viewpoints and designated landscapes
Appendix 18.6 - SLVIA Photomontages and Visualisations	Viewpoint material, wireframes, photomontages and visual evidence base
Ornithology Chapter and Appendices	Collision risk, displacement, abundance modelling and population viability assessment
Commercial Fisheries Chapter	Fishing access, displacement, gear conflict and fisheries impacts
Offshore Airborne Noise Chapter	Noise assessment, receptor sensitivity and reliance upon onshore standards
Human Health Chapter	Health and wellbeing pathways, vulnerable receptors and community effects
Chapter 24 - Residual Effects	Effects remaining after mitigation
Chapter 25 - Mitigation and Monitoring	Future commitments, management plans and post-consent controls

APPENDIX B - RELEVANT POLICY FRAMEWORK

- National Planning Framework 4 (NPF4), including policies relating to biodiversity, historic assets, energy infrastructure, health, amenity and sustainable tourism.
- Scotland's National Marine Plan, including GEN 18 on early and effective engagement and provisions relating to marine historic environment, biodiversity, seascape and sustainable use.
- National Islands Plan, including principles relating to community empowerment, island resilience and protection of distinctive island communities.
- Habitats Regulations framework, including Appropriate Assessment, adverse effects on site integrity, derogation, alternatives, IROPI and compensatory measures.
- Marine licensing and Environmental Impact Assessment requirements concerning cumulative effects, residual effects, mitigation and reasonable alternatives.

APPENDIX C - COMMUNITY AND LOCAL CONTEXT

This objection is submitted by [Redacted], a resident of West Lewis, with direct experience of the local environment, landscape character and coastal setting affected by the proposed development.

Local observation and community knowledge indicate regular White-tailed Eagle activity within the Croir and Little Bernera coastal area, including repeated hunting behaviour along the coastline.

The west coast of Lewis is also a culturally distinctive area in which Gaelic language, coastal place-names, crofting, fishing, religious observance, dark skies, tourism, archaeology and community identity remain closely interconnected.

A recent community survey has reported substantial local opposition to the development. While such material is not a substitute for statutory consultation, it provides relevant context regarding local sentiment and community acceptance.

BIBLIOGRAPHY AND SUPPORTING REFERENCES

- Spiorad na Mara Offshore Wind Farm Environmental Impact Assessment Report, Volume 1 and Volume 2 chapters and appendices.
- Spiorad na Mara Marine Licence Application Form - Generation Supporting Document, February 2026.
- Spiorad na Mara Marine Licence Application Form - Transmission Supporting Document, February 2026.
- Spiorad na Mara Chapter 18 Seascape, Landscape and Visual Impact Assessment and Appendix 18.6 Photomontage Visualisations.
- Spiorad na Mara Ornithology Assessment, Collision Risk Model, Displacement Assessment and Population Viability Assessment appendices.
- Spiorad na Mara Commercial Fisheries, Human Health, Offshore Airborne Noise, Residual Effects and Mitigation chapters.
- Scotland's National Marine Plan.
- National Planning Framework 4.
- National Islands Plan.
- Habitats Regulations and associated Scottish Government / NatureScot guidance on Appropriate Assessment, derogation and protected species.
- Community Opinion Survey materials published by Environmental Management Group Lewis.
- Relevant published research and guidance concerning wind farm noise, low-frequency sound, visual assessment, photomontage interpretation, White-tailed Eagle sensitivity and offshore wind cumulative effects.

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: FORMAL OBJECTION: To the proposed Spiorad na Mara Offshore Wind Farm (N4) (Section 36 Consent and Marine Licence Applications 00011742 / 00011743)
Date: 07 May 2026 22:44:05

FORMAL OBJECTION: To the proposed Spiorad na Mara Offshore Wind Farm (N4) (Section 36 Consent and Marine Licence Applications 00011742 / 00011743)

To whom it may concern,

I am writing to you as a resident of Sgìre Uig, though born in Gress, to voice my strong opposition to the Spiorad na Mara (N4) project. I am a native Gael, a Leòdhasach, of considerable age and have lived on this land for many years. I am writing because I am deeply concerned that this project will cause irreversible damage to our Gàidhealtachd, not just to the land, but to our people and to our way of life.

I believe this proposal goes against the government's own rules (specifically I believe: NPF4 Policies 4, 7, and 30) regarding our natural environment and cultural heritage. My concerns are as follows:

- **The Threat to the Gàidhealtachd:** Our language and culture are rooted in this specific landscape. The Gaelic names for every cnoc and traigh tell our history. By turning this coastline into a massive industrial zone, you are eroding the cultural soul of the area. I fear that such a large industrial intervention will dilute our community and hasten the decline of the Gàidhealtachd at a time when it is already fragile.
- **The Sheer Size of the Things:** At 339 metres tall, these turbines are absolutely massive. Putting structures that size so close to our shore is a huge mistake. It will completely dominate the horizon and destroy the sense of peace and "wildness" that has sustained our people for generations.
- **The Threat to Our History:** Our cemeteries are threatened by this horror, our precious people of the past are to be disrespected and our history desecrated. Places like the Dun and Calanais stones are also part of our heritage. They sit in a landscape that has remained largely unchanged for thousands of years and yet there seems to be no regard for the history of my own generations or the history of our ancestors 5,000 years ago. You cannot undo that kind of damage.
- **Our Local Way of Life:** Our tourism and our small businesses rely on the beauty of the islands. If the scenery is ruined, the visitors will stop coming, and it is the local folk who will suffer. I also worry that this project will strip our local services of workers, making it even harder for those of us who rely on local care and community support. We are already suffering from shortages in this regard, this windfarm might bring short term work for men, but where are the women who support our families and our communities going to be if you destroy the tourism sector that many rely on.
- **Ruining the Dark Skies:** One of the blessings of living here is the clear, dark nights, the joy of seeing the milky way and Na Fir-chlis (the northern lights). These turbines will have flashing red lights on them, which means our night sky will be constantly blinking. This industrial presence on the horizon is an insult to the natural beauty of the West Side.

We are only the caretakers of this land for a short time. As an elder in this community, I feel a duty to ensure we leave our children and grandchildren the same rugged, beautiful coast that we inherited, a place where the Gaelic language and culture can still find a home.

The harm this project will do to Lewis far outweighs any "green" benefit. It is the wrong project in the wrong place. I urge the Comhairle and the Marine Directorate to respect our heritage and refuse this application.

Is mise, le urram,

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

From: [REDACTED]
To: [MD Marine Renewables](#)
Subject: MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis
Date: 07 May 2026 23:06:18

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

Date 7th May 2026

Objection

The proposal to construct an array of 60 of the largest wind turbines in the world in such an area of highly sensitive frontier coastline ,and so close to shore, is grossly inappropriate and I am frightened for the welfare of myself & my neighbours and neighbouring communities and the wonderful sea life and wildlife.

The Offshore Wind Plan Option N4 off the West coast of the Isle of Lewis was created due to a faulty process. It is also not a valid Plan Option as it does not fulfil the definition of an offshore wind Plan Option. It's unjustifiable creation was due to a faulty, unreliable public consultation and relied upon

erroneous impact assessments. The SMP-OW 2020 shows this by measuring the human population health effect of all the plan options - the result being "N/E" meaning "no effect" for all of the sites bar N4 which is classed as having potential major negative impacts on human population health due to the noise of pile driving. The construction phase is now estimated to be 5 years. The communities here are not used to industrial noise. Many have grown up in this very rural undeveloped setting . Others have moved here for the peace. Big machinery is not used here . The roads are small and traffic is very light. It is a traditional, small scale, simple way of life here . Many indigenous Scots Gaelic speakers still live on the crofts of their ancestors, rearing sheep, growing potatoes. One small motor boat on the sea here sounds loud . What effect will the proposed 35 vessels during construction have? Also the noise of pile driving ? Pile driving cannot/ should not be likened the natural elemental sound of the wind . Northland took wind readings and have said that the wind is loud . I can sleep through a storm ,but am kept awake by any small mechanical or electrical hum or tick. Construction noise on calm days will be a nightmare

for many in our community. Natural sounds are beneficial to life ,industrial noises are not.

Northlands E.I.A does not consider the sensitivity of these fragile communities whose simple respectful ,sustainable way of life ,that supports many rare and endangered seabirds and cetaceans and also the spectacular rare machair system and its beautiful display of wild flowers , is an inspiration to the world and needs to be supported and protected not harmed.

I respectfully request that this application is rejected.

Yours faithfully,

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



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