

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

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

My address: [Redacted]

Postcode: [Redacted]

Date: 04/05/26

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

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

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

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

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

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

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

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.'*

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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,'*

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

My further objection points:

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: Objection - Spiorad na Mara Offshore Wind Farm (MD-00011742 & MD-00011743)
Date: 06 May 2026 21:37:38

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

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.

I hope that all of the factors are taken into account to ensure that our island and heritage are protected for future generations.

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]

Member of Public 2433

My address: [Redacted]

Postcode: [Redacted] Email: [Redacted]

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 for the reasons set out below:

Summary of objection

I object to the Spiorad na Mara (N4) offshore wind farm application because the submitted Environmental Impact Assessment Report and supporting documentation do not provide sufficient information to assess the full likely effects of the proposal, alone and in-combination, and do not demonstrate compliance with key national marine and planning policy tests. In particular, the proposal risks significant adverse effects on internationally protected bird populations and designated sites; does not take cognisance of the islands' culture and heritage, including impact on the endangered Gaelic language; fails to protect the integrity and setting of scheduled monuments and the wider historic landscape (including Calanais); and proceeds on the basis of piecemeal consultation and assessment that omits or defers critical onshore/enabling works impacts (including impacts on irreplaceable habitats and crofting interests).

Request

For the reasons set out below, I ask that consent is refused. In the alternative, I ask that the application is not determined until the following minimum requirements are met and publicly consulted upon:

1. A robust Habitats Regulations Appraisal that concludes no adverse effect on the integrity of relevant SPAs, alone and in-combination, supported by adequate baseline survey coverage and transparent collision/displacement/barrier-effect modelling.
2. An assessment of impacts on the cultural significance of the west Lewis coastal landscape and living Gaelic heritage (including community wellbeing), and an Islands Community Impact Assessment, with evidence of meaningful engagement.
3. A complete assessment of the impacts on the integrity and setting of scheduled monuments and their wider historic landscape (including Calanais and SM13786), with any claimed "exceptional circumstances" clearly evidenced and alternatives transparently addressed.
4. An integrated assessment of the offshore proposal together with all necessary onshore/enabling works (including landfall/cabling route options and construction compounds), addressing effects on irreplaceable habitats such as machair and deep peat, and crofting rights and interests.
5. A robust construction-phase assessment (and appropriately detailed outline management plans) covering traffic/logistics, pollution prevention, noise, lighting (including a nocturnal baseline), and cumulative effects.
6. A proportionate assessment of socio-economic effects, including risks to housing and labour markets and the tourism/dark skies offer, with mitigation that is defined, enforceable, and not left to post-consent development.

The detailed grounds for my objection are set out under the headings below.

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Personal Impact statement:

From the day plans for this project were brought to people's attention, the project has instilled a sense of unease, and increasingly genuine concern, in me, because of the way it is being communicated and progressed by the developer and their main partners. I am generally supportive of wind power and recognise the unique resources we have on our doorstep which I believe we *should* develop, and local community trusts have demonstrated in abandon the benefits that wind turbines can bring to our communities. The Spiorad na Mara development, however, has shown none of the awareness of local sensibilities and collaborative and consensus-based approach inherent in the development of community renewables, nor do they display any concern for our island's residents, communities, our natural resources, the unique culture or local challenges, beyond efforts to buy our consent through small scale sponsorships of local clubs and events. The developer neither undertook the early, effective and meaningful engagement that national policy expects, nor does this application demonstrate that community concerns have informed project design, assessment, and mitigation.

The sheer scale and production capacity of the planned Spiorad na Mara development has already resulted in a much more small-scale community-owned development with local support (West Coast Wind Energy) having their previously guaranteed offer of grid access withdrawn due to lack of grid capacity, while other community developments can't even hope to be considered. The developer could make a meaningful contribution to local empowerment and a **Just Transition (NPF4 Spatial Principle – Just Transition)** by giving up some of Spiorad na Mara's grid capacity in favour of such smaller developments which genuinely contribute to **Community Wealth Building** but have shown no interest in doing so. Instead, their proposal risks exacerbating the current significant socio-economic imbalance between island households and those in more urban, mainland regions by facilitating the export of benefits and wealth away from the island (**NPF4 Policy 25; National Marine Plan Policy GEN 2**). The project is likely to put significant pressure on the local housing and labour markets by snapping up limited rental accommodation for workers housing at rates locals can't compete with, and cannibalising businesses in locally important industries by attracting their workers to better paid – but short-term – roles in support of the development (**NPF4 Policy 30**).

The way in which the developers treat the island's Gaelic heritage goes beyond ignorance and amounts to arrogance and cultural appropriation: the development has been given a Gaelic name as if Gaels had inputted into it, yet the principle of dùthchas which Gaeldom's approach to the use of our natural resources is so deeply rooted in is being completely ignored (**NPF4 Policy 7; Historic Environment Policy for Scotland (HEPS)**). No adequate **Islands Community Impact Assessment (Islands (Scotland) Act 2018)** has been undertaken to identify and mitigate likely impacts on the Gaelic language and culture despite the communities immediately adjacent to the planned development forming being a pilot Area of Linguistic Significance under the recent **Scottish Languages Act (2025)**. The project fails to respect the cultural landscape as a whole, treating historic sites as isolated objects rather than part of the living environment and heritage (**LDP Policy EH1; NPF4 Policy 7**).

Consultations were undertaken on a staged and piecemeal basis, ensuring that the public and stakeholders were never given an opportunity to assess and respond to the proposed project in its entirety and consultations could instead be framed in a way favourable to the developer. Meanwhile, research unfavourable to the developer, such as the full **Social Impact Assessment**, was ignored and hidden, further preventing the community from properly scrutinising the project's risks (**NPF4 Policy 14; Aarhus Convention**). As a result, any assumption of good faith and trust on behalf of the developer has long been lost, as they hide behind project splitting and the reduced regulation that comes from this being classed an offshore development despite the close proximity to shore and the massive size of the turbines meaning that the impact – visual, audial and other – will be much greater than that of any of the island's current onshore developments. The developer further ignores the cumulative impact of this project, as the off-shore development could not proceed without supporting on-shore infrastructure, which will destroy irreplaceable natural resources (**NPF4 Policy 14; Aarhus Convention & NPF4 Policy 3**) and cut straight through local settlements.

The land and sea around our islands is home to some of the most important natural resources and habitats, from carbon storing peatlands and endangered birds and flowers, to the marine creatures and coral that find relative respite due to the largely sustainable management and harvesting methods employed by local crofters and fishers. Yet the developer fails to provide detailed **Construction Environmental Management Plans** or **Pollution Prevention Plans** to enable a robust assessment of impacts, nor does their **Environmental Impact Assessment Report** apply a

realistic worst-case scenario (**National Marine Plan; NPF4 Policy 1**). Their own **Habitat Appraisal Derogation Case** proves, however, that the project cannot be completed without damaging protected natural sites (**Habitats Regulations; NPF4 Policy 3**) and is unable to evidence that local bird populations, some of which are critically endangered, will survive (**National Marine Plan Policy GEN 9**), thereby failing the **Precautionary Principle**. Light pollution from the project is likely to kill nocturnal species, yet the developer has failed to establish a proper nocturnal baseline (**NPF4 Policy 3; Marine Policy Statement**) and dangerously underestimates the impact of phototaxis on migrating birds (**NPF4 Policy 4**). The proposal's evidence base for marine impact is similarly incomplete, with their **Environmental Impact Assessment Report** containing significant gaps in baseline data (**National Marine Plan; NPF4 Policy 1**) and using biased aerial surveys that ignore established land-based basking shark data (**National Marine Plan Policy GEN 9**). The environmental impacts therefore clearly will not be "negligible" as claimed, a fact underlined by the requirement for **European Protected Species (EPS) licences (NPF4 Policy 3; EPS Regulations)**. Furthermore, no evidence is provided that alternative fishing grounds are available to prevent the potential collapse of the local fishing industry (**NPF4 Policy 11; NMP Policy GEN 4**), despite this being one of the island's oldest sectors with deep connections with local history, culture and heritage.

While not my primary concern, there is no doubt that the proposed development will also have a huge and irreparable impact on the tourism industry which is not only one of the islands' main employment sectors, but has created national and international renown. Hospitality and tourism are likely to be heavily affected by labour displacement (**NPF4 Policy 30**), invaluable heritage sites and the wider context within which they sit will be destroyed (**LDP Policy EH1; NPF4 Policy 7**), the project will result in a permanent loss of astronomical amenity thereby destroying the area's appeal as a dark sky destination (**NPF4 Policy 30; LDP Policy PD2**), and while the **Environmental Impact Assessment Report** fails to provide a model for this, it's presumption of a "high magnitude of change" to the land- and seascape will undoubtedly impact tourist visits and spending (**NPF4 Policy 30; LDP Policy ED1**).

Rather than using this submission to provide the comprehensive assessment of impacts, risks and mitigation stakeholders have been so desperately demanding, the developer appears to hope that vague promises of post-consent mitigation will be sufficient to cover the large gaps in information provided. Given the developer's approach to date during a period when they knew that there would still be an opportunity for interested parties to assess and object to their proposals via the planning process, I have very little faith that there will be any meaningful engagement or mitigation once that statutory hurdle has been overcome and planning, even if only in principle or with conditions, achieved. The pre-determination of mitigation without evidence-based results fails the test of a robust planning application (**NPF4 Policy 1**) and a project of this magnitude, cost and controversy would surely be expected to be able to provide a robust planning application. I therefore strongly object to planning being granted until outstanding data has been provided and all concerns adequately addressed.

I recognise that we are finding ourselves in a **Climate Emergency** and that a rapid transition to the use of renewable energy must take place if we are to avoid the worst consequences. For this very reason, however, it is critical that this transition is a **Just Transition** which takes a proportionate approach to development. Developments must be designed in collaboration with the people and communities most affected by any negative impacts though, taking cognisance of their concerns, culture and sensibilities, and of course be sensitive to the landscape and wildlife that the **NetZero** transition is aimed at supporting and restoring. Unfortunately, the planned Spiorad na Mara development appears to fail all those tests and is rooted in corporate greed, not Community Wealth Building (**NPF4 Policy 25**).

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

I respectfully request that this application is rejected.

Yours sincerely,

***Signature:** [Redacted]

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

x

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