

Spiorad na Mara Limited
Regus Building
1st Floor, 93 George Street
Edinburgh
United Kingdom
EH2 3ES

27/02/2026

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

Dear Sir/Madam,

Application by Spiorad na Mara Limited for Consent to Construct and Operate a Generating Station: Spiorad na Mara Offshore Wind Farm

Spiorad na Mara Limited (Ltd) (the Applicant) is proposing the development of the Spiorad na Mara Offshore Wind Farm (OWF) (the Project) located off the northwest coast of the Isle of Lewis / Eilean Leòdhais in the Western Isles / Na h-Eileanan Siar, Scotland / Alba.

This application is being submitted by the Applicant for:

- consent under Section 36 of the Electricity Act 1989 (Section 36 Consent) for the construction and operation of an offshore generating station (the Spiorad na Mara Offshore Wind Farm).
- A declaration under Section 36A (s.36A) of the Electricity Act 1989 extinguishing public rights of navigation so far as they pass through the locations in the sea where the structures forming the Spiorad na Mara Offshore Wind Farm are to be situated.

This letter also includes applications for the following Marine Licences under and Part 4 of the Marine (Scotland) Act 2010:

- Marine Licence – Generating Station (wind turbine generators (WTGs), foundations, array cables, associated boulder clearance, scour and cable protection and all associated fixtures, fittings and protections).
- Marine Licence – Offshore Transmission Infrastructure, includes one offshore substation platform and associated offshore cables transmitting power to the Landfall, associated boulder clearance, pre-lay rock carpet, cable protection and High Density Drill works at landfall.

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Overview of the Proposed Development

The Project requires offshore and onshore development. The Proposed Development which is the subject of this application is the offshore components of the Project, referred to as the Offshore Project.

Onshore components of the Project would be located landward of the Mean Low Water Springs (MLWS) and are referred to as the Onshore Transmission Works (OTW) Project. The OTW Project will be subject of a separate application and does not form part of the Proposed Development which is the subject of this application.

The Offshore Project would be located off the northwest coast of the Isle of Lewis (seaward of the Mean High-Water Springs (MHWS)) and would comprise the following elements of the overall Project:

Energy generation infrastructure:

- Up to 60 Wind Turbine Generators (WTGs) and associated foundations.
- Blade tip height will be up to 338.4 metres (m) above Mean Sea Level (MSL) and will have a 30 m minimum air gap above MSL.
- The maximum swept area of the WTGs within the design envelope is 2,709,310m²

Offshore Energy Transmission Infrastructure

The offshore transmission infrastructure comprised in the Proposed Development includes an Offshore Substation Platform, Array Cables, Export Cables, cable protection and HDD exit pits seaward of MLWS.

However, only a subset of the total infrastructure applied for will be built out which will be controlled by suitable conditions of the marine licence and section 36 consent. The infrastructure to be built out depends on whether an onshore landfall substation is built, which is the subject of a separate application for the OTW Project (see below).

The offshore transmission infrastructure which will be built out will comprise of the infrastructure detailed in one of the two following scenarios:

Scenario 1: WTGs connected to an OSP and then to Landfall

An Offshore Substation Platform (OSP) off the west coast of Lewis/Eilean Leòdhais located offshore.

The key offshore components of this option are:

- Array Cables connecting multiple WTGs will transmit the generated power from each WTG to the OSP;
- Export Cables, that transmit higher voltages over longer distances, connecting the OSP to the Landfall.

Scenario 2: WTGs connected directly to an Onshore Landfall Substation

In the case that an onshore landfall substation located onshore northeast of Barvas/Barabhas is built out under the separate OTW Project application, the offshore components required to be built out will be:

- Array Cables installed in several string circuit configurations, connecting multiple WTGs together and the final WTG in each string will transmit the generated power from the WTGs directly to the Landfall where the Array Cables will connect to the Onshore Cables at the transition joint bays.

In both scenarios boulder clearance, scour and cable protection, and HDD works will be required.

Table 1 sets out what potential infrastructure would be included in each of the Marine Licences being applied for.

Table 1: Works Included in Marine Licence Applications

Marine Licence Generating Station	Marine Licence transmission infrastructure
Wind Turbine Generators including foundations Array Cables between offshore infrastructure within the Array Area Array Cables to Landfall Boulder clearance, scour and cable protection, and works associated with the HDD, including up to 13 HDD exit pits Associated infrastructure such as navigational markers and buoys	Offshore Substation Platform Export Cables from the Offshore Substation Platform to Landfall Boulder clearance, scour and cable protection, and works associated with the HDD, including up to 3 HDD exit pits Associated infrastructure such as navigational markers and buoys

Onshore Application

The Spiorad na Mara onshore transmission infrastructure associated with the Spiorad na Mara Offshore Wind Farm (referred to as the OTW Project) located landward of the Mean Low Water Springs (MLWS) will be subject of a separate application for planning permission under the Town and Country Planning (Scotland) Act 1997.

For information only, the main components of the OTW Project are:

Landfall

- Above MLWS: Up to 13 HDD entry points and Transition Joint Bays (TJBs). These onshore entry points and TJBs will be located on the landfall site near a coastal cliff at Barvas / Barabhas or Barbhas and will connect to the offshore landfall HDD exit pits located below MLWS. The onshore TJBs are underground chambers which will house the connection between the Export Cables or Array Cables to the Onshore Cables.

Energy transmission infrastructure that will consist of either:

- Scenario 1: in the case that the offshore Scenario 1 described above is built out, up to 2 Onshore Cables will connect from the transition joint bays to a Grid Substation east of Creed Industrial Park; or

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- Scenario 2: in the case that the offshore Scenario 2 described above is built out, an Onshore Landfall Substation will be required to be built and up to 12 Onshore Cables will connect from the TJBs to the Onshore Landfall Substation located near Barvas / Barabhas or Barbhas. From the Onshore Landfall Substation, up to 2 Onshore Cables will connect to a Grid Substation east of Creed Industrial Park.

Grid Substation

- The Grid Substation east of Creed Industrial Park will connect to the grid connection point at the planned new Scottish and Southern Electricity Networks (SSEN) Lewis Hub converter station via underground cables.

Design Parameters of the Offshore Project Boundary

Table 2 identifies the design parameters of the Offshore Project Boundary. The Offshore Project includes the Array Area which, at its closest point, is located approximately 5 km from the coast and has an area of approximately 161 km². Water depths across the Array Area generally range from approximately 37 – 67 m, except for a localised depression in the southwest corner where depths reach approximately 72 m. WTGs and the OSP (if required) will be located in a smaller area within the Array Area referred to as the Turbine Area.

The Offshore Cable Area of Search (OCAS) is approximately 47 km² which covers the area within which Offshore Cables will be laid to connect the WTGs to the shore. The OCAS lies between the edge of the Array Area and the HDD exit pits at the Offshore Landfall. Cables connecting WTGs and OSP (if required) will be located within both the Array Area and OCAS.

Table 2: Design parameters for Offshore Project Boundary

Parameter	Measurement
Array Area	161 km ²
Turbine Area	140 km ²
Offshore Cable Area of Search (OCAS)	47 km ²
Distance to shore of Array Area	5 - 13 km
Distance to shore of Turbine Area	6 - 13 km
Water depth range in Array Area / Turbine Area	37 to 72 m (MSL)

The generating station will comprise up to 60 wind turbines. Indicative layouts used to inform the EIA are presented in **Figure 3.2a-b, Volume 1c** of the supporting Environmental Impact Assessment Report (EIAR). However, this is an indicative layout, and the final design will be determined following further site-specific surveys and engineering.

Commencement of development

The Spiorad na Mara Offshore Wind Farm is a particularly complex project to deliver due to the location of the site off the west coast of Scotland which is very exposed to adverse weather alongside challenging ground and metocean conditions. This limits the window during which the Applicant will be able to safely commence offshore construction activities.

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Supply chain constraints associated with the delivery of offshore wind projects are well documented and present a substantial challenge for developers. The Applicant highlights the follow particular constraints in respect of Spiorad na Mara Offshore Wind Farm:

- Limited supply chain for key enabling works such as geotechnical investigations and boulder clearance
- Limited global supply chain for WTG and availability of suitable turbine installation vessels
- Limited availability of suitable foundation installation vessels capable of installing hybrid gravity base foundations could be a significant issue for the construction programme for the Project due to their size and weight.
- The west coast of Scotland has more limited port infrastructure than other areas, albeit there are plans for further development which may take time to come to fruition. If west coast of Scotland port development does not come to fruition alternative ports further away may have to be utilised.

In addition to locational and supply chain constraints, uncertainties around grid connection dates have been introduced by NESO's connection reforms which may result in a delay to the current connection date, resulting in delay to the construction programme.

The Project is dependent on the completion of the Western Isles HVDC Link and associated mainland grid development. Delays to some mainland grid developments needed to facilitate the Project's grid connection have recently been announced because of planning delays, for example, the recent refusal of planning permission by The Highland Council for the Fanellan substation. A delay in grid connection availability would delay the commencement of works for the Project.

Securing suitable components and delivery infrastructure at the optimum period for offshore construction activities is a unique challenge for this Project alongside the other challenges such as grid reform facing the wider industry.

Whilst it is noted that recent decisions have included the caveat on commencement dates as "*or in substitution such other later period as the Scottish Ministers may hereafter direct in writing*" the Applicant requests that consideration to be given to granting consent with a 7 year commencement period in recognition of the Project's unique challenges and to support funding and investor confidence given these challenges.

Environmental Impact Assessment (EIA) and Habitats Regulations

An Environmental Impact Assessment (EIA) has been completed for the Proposed Development in accordance with The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) and The Marine Works (Environmental Impact Assessment) Regulations 2017 (as amended). The EIA Report (Volumes 1 to 4) has been submitted as part of this consent application.

A Habitats Regulations Appraisal (HRA) has also been completed as required under the Conservation (Natural Habitats, & c.) Regulations 1994, The Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (collectively referred to as the "Habitats Regulations"). In accordance with these Regulations a Report to Inform an

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Appropriate Assessment (RIAA) (Parts 1 to 3) has been completed based on the outcome from the HRA Screening (assessment of likely significant effects (LSE)).

Offshore RIAA

Under the Habitats Regulations, where the risk of adverse effects on the integrity (AEOI) of a protected site cannot be excluded, decision-makers may grant consent for a plan or project that must be carried out for imperative reasons of overriding public interest (IROPI) where there are no alternative solutions and subject to compensatory measures to ensure that the overall coherence of the national site network is maintained. These three tests (no alternative solutions, IROPI and compensatory measures) form the “Derogation Case” on which the decision-maker should be satisfied before granting consent for a plan or project.

The conclusions of the Offshore RIAA include an Applicant’s Approach and a NatureScot Approach and has identified the potential for AEOI to be concluded or that an AEOI cannot be ruled out on a number of Special Protection Areas.

The Applicant is providing derogation case into two categories to accompany this Application, a Full Derogation Case and a Without Prejudice Derogation Case. It should be noted that the project level contribution in all cases is very small, and for many is considered intangible.

The two categories are defined as follows:

- Full derogation case: where the Applicant’s approach concludes an AEOI or cannot conclude no AEOI in-combination with other plans or projects beyond reasonable scientific doubt
- Without prejudice derogation case: Where the NatureScot approach concludes an AEOI, or an AEOI cannot be ruled out in-combination but the Applicant’s approach does conclude that AEOI can be ruled out.

Therefore, while the Applicant does not accept that the application of the HRA derogation provisions is necessary in all instances for the Offshore Project, the Applicant has provided the information necessary to support a HRA derogation case for the Offshore Project, which could be relied upon by the Scottish Ministers if required. The derogation case demonstrates that the HRA derogation provisions can be satisfied if necessary to authorise the Offshore Project

It is also noted that in circumstances where AEOI are identified for a European site outside Scotland or the Scottish offshore region, the Scottish Ministers must notify the Secretary of State (SofS) and can only agree to the project after having been notified of the SofS’s agreement. As such, the enclosed documents provide a comprehensive Derogation Case that can be relied upon by the Scottish Ministers and SofS to the extent required.

Documentation Enclosed

The documents submitted as part of the application package include:

- This cover letter
- Two Marine Licence application forms and supporting information for:
- The Generating station under the under the Marine (Scotland) Act 2010)

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- Offshore Transmission Infrastructure under the Marine (Scotland) Act 2010
- Draft public notices of the applications
- Report to Inform an Appropriate Assessment under the Habitats Regulations
- A Derogation Case in two categories (full case and without prejudice case)
- Environmental Impact Assessment (EIA) Report (Volumes 1-3), including a Non-Technical Summary and supporting figures and appendices
- Fisheries Mitigation Monitoring and Communication Plan
- Outline Written Scheme of Investigation including Protocol for Archaeological Discoveries
- Marine Pollution Contingency Plan
- Invasive Non-Native Species Mitigation Plan
- Offshore Planning Statement
- Pre-Application Consultation (PAC) Report

Please note that a separate Report to inform a Marine Protected Area Assessment is not included with this Application however the information required to inform a Marine Protected Area Assessment is included in Chapter 13: Marine Mammals of the EIAR.

Public Notices / Advertisements

Public notices advising that the Applicant has submitted applications for a Section 36 Consent and accompanying Marine Licences to Marine Scotland and inviting the public to submit comments on the application will be placed in the following publications on dates to be agreed with Marine Scotland's Licensing Operations Team:

- The Herald
- Edinburgh Gazette
- Stornoway Gazette

The adverts will advise the public how to participate in the consultation on the application, in accordance with The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Electricity (Applications for Consent) Regulations 1990.

Hard copies of the application documents will be made available for the public to view at the locations identified within **Table 3**.

Table 3: Hard Copy Viewing Locations

Location	Address	Opening Hours
Stornoway Library	19 Cromwell Street, Stornoway, Isle of Lewis, HS2 9BD	Tuesday – Friday 10:00-17:00 Saturday 10:00 – 16:00
Horshader Community Development	Raebhat House, North Shawbost, Isle of Lewis, HS2 9BD	Monday – Thursday 9:00 – 17:00 Friday 9:00 – 16:00
Carlway Community Centre	Knock, Carlway, Isle of Lewis, HS2 9AU	Monday - Friday 9:30 - 18:00 Saturday – 10:00 - 18:00

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In addition to the hard copies available to view at the locations above, an electronic copy of the application will also be made available via the MD-LOT's website:

<https://marine.gov.scot/?q=ml/spiorad-na-mara> and on the Applicant's website
<https://northlandpowerscotwind.co.uk/spiorad-na-mara/>.

Hard copies of the application can be purchased by request via the Project website; Request can also be made by writing to:

Northland Power
93 George Street
Edinburgh
EH2 3ES

We look forward to hearing from you in relation to the formal acceptance of the applications.

Yours sincerely

Martin Whyte

[Redacted]

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