

Energy Consents and Deployment Unit
Scottish Government
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**Scottish
Wildlife
Trust**

01 August 2014

Dear Ms. Gallacher

Re: Proposed Section 36 - Talladh-a-Bheithe Wind Farm

The Scottish Wildlife Trust recognises that onshore wind farms are amongst the most established of renewable technologies and supports their development as part of Scotland's energy portfolio. But they must avoid sites where there would be unacceptable modification, loss or fragmentation of important species, habitats or ecosystems, in line with the criteria set out in our policy on The Planning System.¹ The Trust believes that each individual application should be carefully assessed for its potential environmental impact before consent is granted.

The Scottish Wildlife Trust would like to object to the above planning application for the reasons detailed below.

Blanket Bog and Deep Peat

The majority of the site and consists of a large scale mosaic of blanket bog (M20, M17, M19, M20) and wet heath (M15). Both are listed as internationally important Annex I Habitats under the Habitats Directive and are considered to be of very high sensitivity. Including the 5 m buffer a total area of 21 ha of blanket bog and 2.55 ha of wet heath will be permanently lost in construction.

From Chart 4.2.1.1: (Peat Depth Distribution Histogram) it can be seen that the proposed windfarm will be built on a significant depth of peat. The mean peat depth across wind turbine locations was calculated to be 0.8 m it is the Trust opinion that this will involve an unacceptably high level of peat displacement. Of particular concern are turbines WTG3 (max peat depth of 3.5 m), WTG3 (mean peat depth of 1 m), WTG6 (mean peat depth of 1.1 m), WTG8 (mean peat depth of 1.6 m), WTG 13 (mean peat depth of 1.1 m), WTG 15 (mean peat depth 2.1 m), WTG 19 (mean peat depth of 1.0 m) in addition to this the peat depths in borrow pit B are as deep as 2.8m. The Trust would consider any Turbine or other infrastructure placed on peat depths of greater than 1 m to be unacceptable.

The Trust is concerned about both the loss of habitat and the release of carbon stored in the peat. Mitigation may go some way to compensating for the habitat and peat loss, however, it should be highlighted that the peat depths recorded here would take up to 4000 years to form and this habitat cannot be simply recreated over night.

¹

http://scottishwildlifetrust.org.uk/docs/002_057_publications_policies_Policy_on_the_planning_system_June_2012_133_9581875.pdf

The Scottish Government's second Report on Proposals and Policies (RPP2)

RPP2 is the Scottish Government's second report on proposals and policies for meeting its climate change targets. It sets out how Scotland can deliver its statutory annual targets for reductions in greenhouse gas emissions for the period 2013–2027 set through the Climate Change (Scotland) Act 2009.²

RPP2 identifies peatlands as an important carbon store as well as recognising that they have huge benefits for water management and biodiversity. In this case, section 9.2.3 of RPP2 is particularly relevant as it states that the Scottish Government are:

"...working to ensure that Scotland's peatlands will be managed in ways that conserve their substantial carbon stores and biodiversity."

The proposal as it stands would admittedly have some environmental benefits e.g. removal of conifer plantation and grip blocking, however, the development of a wind farm in this area would adversely affect the peatlands on site and hamper the Scottish Government's ability to deliver on RPP2. The preference in this case should be to restore the peatland habitat and not to install the proposed wind turbines.

Golden Eagle

With regard to the impact of the proposal on golden eagle the Trust has reviewed the response provided by the RSPB and is in agreement that the VP surveys did not comply with SNH guidance and are within the windfarm footprint. The Trust is of the opinion that this could have deterred golden eagle from entering the area and therefore led to an underestimation in the collision risk. The Trust would like to see additional monitoring out with the windfarm footprint to confirm the collision risk is accurate.

Habitat Management Plan

Should the Energy Consents team decide to grant permission for the proposed development the Trust strongly recommends that no work should be allowed to commence until the applicant has submitted a full habitat management plan. This should be detailed and include full planned monitoring of the peatland habitat and golden eagle as well as options available if management is not having the intended outcomes.

Summary

In summary, due to the impacts to blanket bog, an internationally important Annex I Habitat, the level of peat disturbance, the lack of continuity with RPP2 and the queries regarding the golden eagle vantage points the Trust is opposed to the proposed Talladh-a-Bheithe Wind Farm.

The Scottish Wildlife Trust would like to be kept informed of the progress of this application.

Yours sincerely,

Bruce Wilson

² <http://www.scotland.gov.uk/Resource/0042/00426134.pdf>

Protecting Scotland's wildlife for the future

Policy Officer