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Scottish Wildlife Trust

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Dear Ms. Melrose,

Re: Section 36 Application for the Proposed Strathy Wood 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.

Our full policy on Energy and Nature Conservation can be downloaded from here:
http://scottishwildlifetrust.org.uk/docs/002__057__publications__policies__Energy_policy___2012__1335525425.pdf

The Scottish Wildlife Trust would like to object to the above planning application for the affect the proposal would have on the Caithness and Sutherland Special Protection Area (SPA), Special Area of Conservation (SAC), Ramsar site, associated Sites of Special Scientific Interest (SSSI) and their qualifying features but also because the proposal is contrary to The Scottish Government's second Report on Proposals and Policies (RPP2). Further detailed information on our objection is given below.

Effect on Designated Sites

The proposed location of four turbines lies within the West Halladale Site of Special Scientific Interest (SSSI) which is part of the Caithness and Sutherland Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site, making negative impacts to these designated areas unavoidable. The location of these turbines would result in an unacceptable level of disturbance to these important sites which have been designated for the huge number of internationally rare habitats and species they support, including breeding hen harrier, breeding red throated diver and blanket bog. Of further concern is the fact that three of the four turbines located in the designated site are also located on deep peat (>1m).

[1] http://scottishwildlifetrust.org.uk/docs/002__057__publications__policies__Policy_on_the_planning_system___June_2012__1339581875.pdf

Effects on Qualifying Features

Priority Habitat: Blanket Bog
Turbines 14,15 and 22 are located in habitats classed under the National Vegetation Classification as blanket bog types (NVC classification M17 and M25). Further to that, turbine 5 is in dry modified bog habitat which although is not a priority habitat, is "seen as functional components of the system as a whole"[2]. It is also noted that in addition to the three turbines noted above (14,15 and 22), an additional four turbines (2, 6, 10 and 24) are also located in deep peat (>1m). Futhermore, the peat depth survey (figure 11-2) does not provide adequate probing data to provide conclusive evidence of the peat depths at turbine locations 1, 5, 9, 13 and 19. For these reasons, the proposal is contrary to The Scottish Government's second Report on Proposals and Policies (RPP2) and displacement of deep peat could result in significant greenhouse gas emissions.

The Scottish Government's second Report on Proposals and Policies: 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.[3]

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. Where peatlands have been damaged, action will be taken to prevent further damage and where practicable to restore them to a favourable condition in which they are no longer a source of greenhouse gas emissions;* "

The Scottish Government (through its agencies) is, commendably, involved in the Peatlands Partnership which aims to restore this peatland habitat, in effect putting the RPP2 into action.

The proposal as it is stands would admittedly have some environmental positives i.e. removal of non-native conifer plantation, however, the placement of a wind farm on this site would significantly affect the ability of the Peatland Partnership to deliver the aims and objectives of the Peatlands of Caithness & Sutherland Management Strategy[4] 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. The Trust does not believe the two projects i.e. windfarm construction and peatland restoration, are compatible on this proposed site.

The Scottish Wildlife Trust does believe that the non-native forestry plantation should be removed as part of the peatland restoration process.

Priority Species: hen harrier and red-throated diver
A number of inconsistencies in survey methodology have been noted in the Ornithology Chapter of the ES. This raises concern that the potential effects on species present, namely breeding hen harrier and red throated diver, have not been accurately measured.

2008/2009 bird surveys. A lack of dawn and dusk surveys which would likely result in red throated diver activity being underestimated. The ES also noted the results of the breeding wader survey were potentially compromised due to methodology.

[2] http://jncc.defra.gov.uk/protectedsites/sacselection/habitat.asp?FeatureIntCode=H7130
[3] http://www.scotland.gov.uk/Resource/0042/00426134.pdf
[4] http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=400

2011 bird surveys. The breeding bird survey was started later than recommended by SNH Guidance[5] which may have resulted in missed early breeding attempts. It is also noted that focal VP watches for red throated divers were only conducted in August and did not provide enough data to establish a regular flight pattern.

2013 bird surveys. Focal VP watches for breeding divers were conducted in 2013, however these watches did not commence until May. SNH guidance recommends such watches begin in April and the ES notes that because of this, early breeding flights were potentially missed. It was also noted in the ES that the minimum number of flights to establish a regular flight pattern were not recorded.

VP's should not be located within the proposed wind farm site. According to SNH Guidance, "this should only be undertaken when the proposed site is sufficiently large that a part of the wind farm site at least 500m from the VP can be watched (observations at closer distances are potentially biased)… (P)otential bias can only be checked for if the area surrounding a VP within a wind farm site is also observed from another VP away from the wind farm site when there is no observer present at the within site VP (i.e. compare the observed bird use during potentially biased conditions against the observed bird use during unbiased conditions)". Each survey year there are VP's located within the site boundary, and within 500 m of the proposed location of turbines in their respective viewsheds. Specific examples of this are:

- Figure 9.2, VP Locations and Viewsheds 2008, 2009: VP 2a and 2b within 500m of the proposed location of turbines 14 and 18
- Figure 9.4, VP Locations and Viewsheds 2010: VP 3a is within 500m of the proposed location of turbines 5, 12 and 16; VP 4 is within 500m of the proposed location of turbines 14 and 18.
- Figure 9.6, VP locations and Viewsheds 2011: VP 6 is inside the site boundary; VP 4b is within 500m of the proposed location of turbines 5 and 16.
- Figure 9.12, VP location and Viewshed 2013: VP 7 is inside site boundary and within 500m of the proposed location of T18

Because of the inconsistencies in survey methodology with SNH guidance across survey years, the Trust believes the potential effects on SPA qualifying Species may not have not been accurately predicted.

Cumulative Effects

The scale and diversity of the Caithness and Sutherland SPA/SAC/Ramsar site and the associated SSSI makes them unique in Europe. They have been designated for the huge number of internationally rare habitats and species they support. The proposed Strathy Wood wind farm would be, in effect, an extension of the approved Strathy North wind farm and would create a continuous connection to the proposed Strathy South wind farm, to which the Trust has an outstanding objection. If both Strathy Wood and Strathy South were approved, they would effectively create a continuous 106 turbine wind farm together with Strathy North.

Considering the issues raised with regards to the accuracy of the predicted impacts of both the Strathy South and Strathy Wood proposal, the Trust is equally concerned that the predictions for the cumulative effects of any combination of these wind farms together could be underestimated and could pose a significant risk to the designated sites and their qualifying features

[5] *Survey methods for use in assessing the impacts of onshore windfarms on bird communities*. Scottish National Heritage. November 2005 (Revised December 2010)

In summary, due to the potential impacts on the Caithness and Sutherland designated sites and their qualifying features, inconsistencies in data and survey methods which may have resulted in incomplete or inaccurate measurement of the potential effects of the wind farm, and for the cumulative impact of another wind farm in such close proximity to others in the area, the Trust is opposed to the proposed wind farm at Strathy Wood.

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

Yours sincerely,

Allison Dubé
Policy Volunteer