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16 October 2013

Dear Mr. McGillivray,

Re: Electricity Act 1989 - Section 36 Addendum on the Proposed Strathy South Wind Farm. Highland Council Ref: 07/00263/S36SU

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_13_35525425.pdf

The Scottish Wildlife Trust would like to object to the above planning application primarily for the affect the proposal would have on the Caithness and Sutherland designated sites 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 Trust is concerned that the proposal has the potential to negatively affect the neighbouring Caithness and Sutherland Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site, as well as the associated Sites of Special Scientific Interest (SSSI).

These important sites have been designated for the huge number of internationally rare habitats and species they support, including breeding golden eagle, breeding golden plover and blanket bog.

There will undoubtedly be an impact on the neighbouring SPA and it is likely that this will be a significant impact, therefore, the Habitats regulations require the competent authority (in this case the Scottish Ministers), to carry out an Appropriate Assessment of the proposal before consent is granted.² The Trust is of the opinion that the information in the Environmental Statement (ES) does not give sufficient levels of detail to properly carry out the Appropriate Assessment; on this basis the Scottish Ministers should refuse consent until they are supplied with more information.

1

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

² <http://www.snh.gov.uk/protecting-scotlands-nature/protected-areas/international-designations/natura-sites/habitats-regulations-appraisal/>

Protecting Scotland's wildlife for the future

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 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 Strategy⁴ 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.

Greenhouse Gas Emissions (GHG)

The displacement of deep peat at this site (>1 m) will result in significant GHG emissions which will undermine the Scottish Government's (Scotland) Act 2009 obligations.

Effects on Species Present

The Scottish Wildlife Trust has reviewed the work of RSPB Scotland in relation to the effect on bird species present at this site and in particular the affect on greenshank, hen harrier, red throated diver, black throated diver, golden plover and dunlin. The Trust shares RSPB Scotland's concern that the proposed development would result in unacceptable harm to these species.

The Trust is of the opinion that in several instances the collision risk has been underestimated due to inappropriate timings of survey and low sample size which in some instances did not meet SNHs minimum guidelines.

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

Yours sincerely,

Bruce Wilson
Living Landscapes Policy Officer

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>