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Theresa McInnes – Consents Manager Energy Consents Unit
Directorate for Energy and Climate Change
Scottish Government
By email to: Econsents_admin@gov.scot

26 October 2020

Dear Ms McInnes,

Re: Energy Isles Wind Farm – Isle of Yell, Shetland, planning application, reference ECU00001844

We are writing with reference to the revised proposed development for 23 wind turbines (9 up to 180m height from ground to blade tip and 14 up to 200m) plus associated infrastructure on a 1,679 hectares site of moorland peatland on the Isle of Yell, Shetland. As a charity that is dedicated to protecting wild places for the health and wellbeing of current and future generations, the John Muir Trust has been considering the implications the revised proposals will have on Shetland's wild land and peatland. We recognise that the design has been modified to reduce landscape and visual impacts. However, given the extent of healthy, quality peatland on the site and its wild qualities which contribute to the landscape of Shetland, we would like to add our concerns to those already expressed by NatureScot, RSPB and others.

This development poses a threat to an area of relatively strong wildness (as identified in NatureScot's 2014 map of relative wildness) that is predominantly characterised by peatland habitat of national importance. From the EIAR Ecology assessment, *'Blanket bog occurs in over 75% of the 1679 ha site and dominates habitat mosaics in a further 14% of the site'*. The healthy condition of the blanket bog is reflected in the watery nature of the site *'The landscape is principally one of undulating peat moorland, with numerous waterbodies (from bog pools to small lochs) and small burns'* and the Environment Impact Assessment Report, *'The peatland areas are natural organic, dystrophic and oligotrophic blanket peat mostly intact and relatively untouched.'* All observations that are echoed in the Revised Peatland Management Plan.

Our collective understanding of the national importance of peatlands has progressed since the Viking wind farm development was approved. There is growing recognition that peatlands are a valuable habitat that we should be protecting if we are to reverse biodiversity loss and keep remaining carbon stores intact. This site is an example of how peatlands ought to be. It is an area of land that is sustaining wildlife (responses from RSPB, NatureScot and Shetland Bird Club demonstrate the diversity of life being sustained by this site) and storing large amounts of carbon - most Scottish peat bogs contain more than 5000 tonnes of carbon per hectare, and it is widely accepted that peatlands are the single most important terrestrial store of carbon globally, but not all are as healthy and active as this site appears to be.

Scottish Planning Policy identifies *'carbon rich soils, deep peat and priority peatland habitat'* as nationally important areas of significant protection. This recognition means wind farms are only appropriate in these areas in some circumstances. According to Scottish Planning Policy *'further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.'* The Applicant has revised

their design, reducing the number of turbines from 29 to 23 and reducing the need for some of the associated infrastructure. However, despite a reduction in turbine numbers, the extent of loss of blanket bog is still recognised as significant; the Supplementary Environment Information Non-Technical summary concludes that *'Despite these significant reductions, the loss of blanket remains a significant effect.'* Given that the site is predominantly blanket bog, and most of the turbines are proposed on peatland deeper than 100cm (three appear to be on soil at a depth of 51-100cm; soil depth greater than 50cm is generally considered peatland), the opportunity to mitigate these significant effects through design is very limited.

Weighed in the balance of the national importance of this habitat for addressing climate change as well as biodiversity loss, the carbon releasing and ecological loss that would result from this proposed development are even more significant. The ecological significance of this habitat is supported by NatureScot's findings from their site survey in 2019 in which they confirmed that the site is supporting extensive areas of Class 1 carbon rich soils, deep peat and priority peatland habitat and concluded *'That despite efforts to reduce impacts on areas of deep peat and summit pool systems, significant damage to areas of deep peat and priority peatland habitat could not be avoided'*. We would urge decision makers to reflect on whether this is an appropriate site for development.

A cohesive national strategy to climate change would be protecting and restoring peatlands so they can reach their full carbon sequestration potential. Scotland's Climate Change Plan states *'By 2050, Scotland's expanded peatlands will be thriving habitats, sustaining a diverse ecosystem'* but we won't achieve this unless we start by protecting the healthy quality peatlands that we have. Protecting this site from development will prevent the release of carbon into the atmosphere and mean this area of wild land can continue to play a part in addressing the biodiversity crisis and climate emergency.

Yours sincerely,

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