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Dear Sir / Madam

Muaitheabhal Windfarm South Extension, Isle of Lewis

1. The John Muir Trust wishes to object to the application by Uisenis Power for an extension to the previously consented Muaitheabhal wind development.
2. The John Muir Trust works to protect and conserve wild land and places and to increase awareness and understanding of the value of such places. We are, therefore, interested in renewable energy developments - both from the point of view of their potential to contribute to a sustainable way of living and their possible impact on wild land.
3. **THE JOHN MUIR TRUST OBJECTS TO UISENIS POWER'S APPLICATION FOR THE REASONS DETAILED BELOW:**

Statutory Guidance for Windfarm Developments on Wild Land

4. Scottish Planning Policy (2010) states: *"The most sensitive landscapes may have little or no capacity to accept new development. Areas of wild land character in some of Scotland's remoter upland, mountain and coastal areas are very sensitive to any form of development or intrusive human activity and planning authorities should safeguard the character of these areas in the development plan."*

Impacts of Proposal on Wild Land

5. The Environmental Statement's assessment of direct and cumulative impact on wild land is flawed and does not follow the recommendations of Scottish Natural Heritage's guidance note *Interim Guidance Note on 'Assessing the Impacts on Wild Land' (2007)*.

6. The general approach suggested in the guidance note is in two stages: first, establishing a baseline of the condition and extent of the wild land resource; and secondly, assessing the magnitude and significance of the impact upon it. It also sets out how to assess magnitude of impact and significance.
7. The Environmental Statement assumes that wild land is restricted to the Search Area for Wild Land (SAWL). However, as SNH's guidance document makes clear in Section 2.1, these Search Areas were only ever intended as starting point: *"The SNH identified search areas do not delimit wild land, and confirming the presence and extent of the wild land area is therefore required which may be within or outwith the present search areas."*
8. Despite this clear guidance, the Environmental Statement makes no attempt to define the extent of wild land outwith the SAWL. In fact, there is strong evidence that much of the area covered by this development has strong wild land characteristics. In January 2013 Scottish Natural Heritage produced a "Phase 1" map showing "Relative Wildness throughout Scotland", which indicates high levels of "wildness", especially in the south of the proposal area. In April 2013 SNH produced a refinement of this – a "Phase 2" map - showing proposed areas of core wild land. This map set out the most extensive areas of high wildness value in Scotland. The whole of the project area is categorised by this Phase 2 map as a core area of wild land.
9. Whilst neither of these maps have statutory status, they are the result of many years of study and assessment, and are likely to be a much more accurate representation of the true extent of wild land in the proposal area than the somewhat crude Search Areas for Wild Land. Despite Table 5.1 of the Landscape & Visual Impact Assessment including the claim that *"The assessment includes an assessment of impact on wild land using data available at the time of writing (March 2013)"* the Phase 1 mapping appears to have been largely ignored in the report's wild land section.
10. Land Use Consultants, who compiled the Environmental Statement, also prepared a Supplementary Environmental Information report for Muaitheabhal Windfarm in 2006. In this they followed SNH guidance and did take steps to identify the extent of wild land in the area, producing a map showing their suggested boundary for wild land on the estate (Figure S6.8). This includes a substantial area of wild land outwith SNH's Search Area – and includes the great majority of the area covered by the current proposal.
11. The developer's conclusions effectively ignore wild land outside of the SAWL. They undertake a baseline assessment for the Search Area for Wild Land, but make no attempt to determine the wider extent of wild land in the study area, as recommended in SNH's guidance. They therefore **fail to adequately assess the extent of wild land in the study area, and hence do not accurately reflect the impacts on the area's wild land character.**
12. The true impact on wild land is likely to be much more significant than the developers claim, as much of the proposal area has been identified by SNH and, indeed, Land Use Consultants, as having strong wild land characteristics. The John Muir Trust therefore **objects** to this development due to its unacceptable impacts on wild land in this part of Lewis.

Cumulative Impact on Wild Land

13. This proposal is an extension to two consented windfarm developments, Muaitheabhal Windfarm and Muaitheabhal Windfarm East Extension. Both these developments, but especially the main scheme, will have significant impacts on the wild land resource of the Eisgein estate, especially the wild land in the northern part of the estate that is outwith the Search Area for Wild Land.
14. The proposed South Extension extends south and west of the main scheme, into the heart of what SNH is proposing as a Core Area for Wild Land, and into an area that the developer's consultants have previously defined as being wild land. The cumulative loss of wild land characteristics within the proposal area (not just within the Search Area for Wild Land) will be significant. This is shown in the Map 1 (attached at the end of this objection) which is based on the cumulative impact map in the Environmental Statement. The map compares visual impacts within the SAWL to those within the wider area previously identified by Land Use Consultants as being wild land, and to the wider still proposed SNH Core Area of Wild Land. The map shows that between 30% - 40% of the proposed Core Area of Wild Land would be affected by the consented and new schemes.
15. The Trust therefore also **objects** to the development due to its cumulative impact on wild land.

National Scenic Area

16. The proposed South Extension will have clear impacts on the South Lewis, Harris & North Uist National Scenic Area. The Environmental Statement assesses the effects on views from the summits of Beinn Mhor, Gormal and Uisinis as being of medium magnitude and having moderate – major effects. The Environmental Statement then goes on to claim that *“despite this localised effect on some of the special qualities of the NSA, the vast majority of the NSA will be unaffected and the special qualities of the South Lewis, Harris and North Uist NSA (as set out in the SNH's Commissioned Report No.374) will be retained.”*
17. The John Muir Trust contests this assessment. The summits mentioned above are three of the main peaks in the South Lewis part of the National Scenic Area, and were chosen as representative viewpoints for this area. In reality, **all** the major peaks of the south east Lewis part of the NSA would suffer moderate – major visual effects if this scheme were to go ahead. The Trust contends that this level of impact seriously degrades the special qualities of the south east Lewis part of the National Scenic Area.
18. In addition, the Trust challenges the developer's assessment of the impacts on the views from Toddun, an important hill within the National Scenic Area. The ES describes the magnitude of change of the view from the summit of Toddun as “Negligible – Low” and the effect of the change as “Minor”. However, as the ES itself points out, *“This is a location from which the special qualities of the NSA may be appreciated. Of particular note are the views up and down Loch Shiophairt.”* The new turbines would be much nearer, and appear much larger than those in the consented schemes. The Trust believes that the magnitude of change and the effect on the view

from Toddun, across Loch Shiophairt, would be considerably higher than the ES describes.

19. Given that there will be significant effects on the views from all the major peaks of the south east Lewis part of the National Scenic Area, as well as impacts on the Toddun area of North Harris, the Trust believes that the South Extension **would** affect the overall integrity of the South Lewis, Harris and North Uist National Scenic Area.
20. The Trust also believes that the effects on the mountain summits would seriously undermine the “wild, mountainous character”, which is one of the special qualities of the National Scenic Area. The key guidance document in this case - *The Special Qualities of the National Scenic Areas. Scottish Natural Heritage (2010)* – elaborates on this special quality: “*The mountains stand still and silent with a distinct lack of movement, and the general absence of development lends a wild and remote character to this whole region of rocky hills, precipitous glens, remote lochs and rushing rivers*”. The introduction of such large structures into views from the NSA would remove much of the wildness from the character of the mountains in South Lewis, with the motion of the blades detracting from this special quality of “still and silent”. In addition, the new access roads would make many of the South Lewis mountains considerably more accessible, thereby reducing their “*wild and remote character*”.
21. The John Muir Trust therefore **objects** to this scheme due to its adverse impact on the National Scenic Area and its effects on the special qualities of the NSA.

Impacts on Golden and White Tailed Eagles

22. The Trust also **objects** to the individual and cumulative impacts of the South Extension on both golden and white tailed sea eagles. The Environmental Statement predicts a possible loss of four golden eagles and eight white tailed eagles due to collisions with the scheme’s turbines.
23. The Eisgein estate is one of the most important areas in the country for both species, and is recognised as such by its designation as an Important Bird Area. The cumulative impacts of the South Extension are dismissed in the Environmental Statement as being insignificant; the Trust does not share this view.
24. The ES predicts a loss from turbine collisions of four golden eagles and eight white tailed sea eagles during the operational life of the windfarm. Added to predicted losses from other consented island schemes, this gives cumulative losses of 22 golden eagles and 17 white tailed.
25. These figures are inevitably estimates, but they do highlight the importance of Lewis for both species of eagle. The Trust believes that the South Extension should be rejected on its disproportionate impact on the area’s eagle population. In particular, the Trust wishes to highlight that these 12 proposed turbines are predicted to kill more white tailed eagles than all 107 previously consented turbines combined. This is an extraordinarily high collision rate for such a small scheme, and emphasises how important the Eisgein estate is for this species.

Yours sincerely

Helen McDade Head of Policy

