

13 June 2012

Energy Consents & Deployment Unit  
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**Head of Policy**

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Dear Sir/Madam

### **Re Muaitheabhal Windfarm, Isle of Lewis - South Extension EIA Scoping Report**

The John Muir Trust would like to make the following submissions in respect of the above document:

**Wild Land.** The report proposes using the following approach to assess the impacts of the development on wild land:

*“Since areas of wild land have not been identified by CNES or by SNH’s Phase II mapping, it is proposed that this assessment will use the Search Areas for Wild Land defined by SNH. Reference will also be made to SNH’s map of Scotland’s Relative Wildness.*”

*“Since there is a consented windfarm adjacent to this extension (Muaitheabhal Windfarm) it is proposed that this assessment assesses the additional impact on the existing wild land resource assuming the consented Muaitheabhal Windfarm is already present.”*

It is clearly important that the most up to date and accurate mapping is used when assessing the proposed development’s impact on wild land. The scoping report proposes to use Scottish Natural Heritage’s Search Areas for Wild Land as the main baseline mapping for this purpose. However, as SNH themselves say on their website, *“the map is a preliminary one, prepared in 2002 for debate and further refinement, and does not include small areas of wild land, or attempt to precisely define the boundary of an area.”*

Whilst the Trust acknowledges that Phase 2 of SNH’s mapping of wild land is not yet complete, the current Phase 1 map of Scotland’s Relative Wildness provides considerable refinement to the old Search Areas map. The Phase 1 map is much more comprehensive and up to date, is far more detailed, **and the Trust therefore requests that SNH’s Phase 1 mapping forms the main baseline mapping for the wild land section of the EIA.**

The Trust notes that the report proposes assessing the impact of the development on wild land *“assuming the consented Muaitheabhal Windfarm is already present”*. This approach is

acceptable **provided** that the developer also undertakes a comprehensive cumulative assessment of the impacts on wild land.

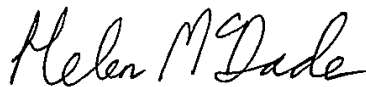
**The Trust requests that the cumulative impact assessment should look at the impacts of all consented and proposed schemes in the area and, in particular, look at the cumulative impacts on wild land of the original Muaitheabhal windfarm, the Muaitheabhal East extension which was consented in December 2011, and the current proposed extension.**

This approach to cumulative assessment is important to allow a full understanding of the impacts of what, in effect, would be a single, enlarged Muaitheabhal windfarm.

**Ornithology.** The Trust, like the RSPB, has serious reservations about the cumulative impacts of the Muaitheabhal windfarm and its extensions on the areas's eagle population. In particular, we would like to highlight the potential impact on the white tailed sea eagle. This species is known to be expanding rapidly in south east Lewis, and has the potential to further colonise the east coast of the island.

**Given the known vulnerability of white tailed sea eagles to collision with wind turbines, we would request that the EIA looks at the potential impact on both the existing sea eagle population and on the projected rate of expansion of the species in this part of the Western Isles over the next 25 years (i.e. the operational life of the windfarm).**

Yours faithfully



**Helen McDade**  
Head of Policy

SENT BY EMAIL