Objection to Muaitheabhal Windfarm East Extension, Isle of Lewis

February 2011

The John Muir Trust wishes to object to the application by Crionaig Power for an extension to the previously consented Muaitheabhal wind development.

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.

•The Trust considers the Environmental Statement to be inadequate and misleading on some key aspects - specifically regarding visual, landscape and cumulative impacts on wild land.

•The Trust comments here on landscape, visual and cumulative effects on wild land

•The Trust also comments on the peat resource

Damage to wild land

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."*

The "search area for wild land" (SAWL) in south east Lewis is identified in SNH's Wild Land Policy document as one of the remotest areas of wild land in Scotland. It is one of only four areas in Scotland that lie more than 8km from any road (of car-carrying capacity) which, together with its exceptional scenic qualities, makes its wild land of outstanding national importance. The impact on Beinn Mhor, on the edge of that area, can be seen in the visualisations of Viewpoint 6.

However, these Search Areas were only ever intended to be guides to areas that might contain wild land and so even the assessment in SNH's Wild Land Policy underplays the extent of the wild land in south Lewis. SNH itself stated, in response to the Scoping document for this development, *"Wild land assessment should be carried out in line with SNH Policy Statement on Wildness in Scotland's Countryside. The Search Areas for Wild Land (SAWL)s are a*

starting point for considering where the proposed development may have impacts upon areas of wildness and wild land qualities; however it is important to understand that wild land and wildness qualities may occur outside these areas as well, as explained in paragraph 12 of Annex 1 of SNH's Policy Statement. Consequently wildness and wild land qualities need to be considered throughout the study area."

SNH emphasised this in a letter to Scottish Government's Renewable Energy Division *"As highlighted in our letter to Land Use Consultants (LUC) of 6 July (Appendix 1) qualities of wild land may extend beyond the Search Areas for Wild Land (SAWL)….As highlighted in our letter to LUC of 6 July, while SAWLs are a good starting point for considering where wildness and wild land qualities may exist within an area, these qualities may also occur outside the SAWLs as highlighted in SNH's policy statement on Wildness in Scotland's Countryside (paragraph 12 of Annex 1)."*

Despite this clear direction, the ES stubbornly only examines SNH's Search Areas for Wild Land using the recommended methodology in SNH's Interim Guidance

Note on "Assessing the impacts on Wild Land".

Para 6.141 of the ES states, *"Since areas of wild land have not been identified by the CNES, this assessment uses the Search Areas for Wild Land defined by SNH. In their scoping response, SNH highlighted that qualities of wild land may extend beyond the Search Areas for Wild Land (SAWL). Wild land characteristics outside these areas have been dealt with as an aspect of landscape character in the main LVIA."*

This methodology is particularly surprising as Land Use Consultants themselves, who compiled the ES, also prepared a Supplementary Environmental Information report for Muaitheabhal Windfarm in 2006, in which they identified a substantial area of wild land outwith SNH's Search Area.

The John Muir Trust would agree with Land Use Consultants' opinion at that time that the area of wild land extends beyond the Search Area for Wild Land. The Trust would suggest that virtually all the land south of Loch Sealg has extremely strong wild land characteristics and that it should be considered as wild land for the purposes of this assessment. A quick look at a map demonstrates the inaccessibility and remoteness of the area, and we suggest that any impartial visitor would find this landscape to be very wild indeed.

The Trust does not believe that the impacts of this application on wild land have been adequately considered in the applicant's Environmental Statement (ES). It is the Trust's contention that the issue of what is a reasonable search area is so important, it should be re-considered.

Having restricted their assessment of wild land to SNH's Search Area, the ES's authors then assert that in no areas would only the Muaitheabhal East extension be visible, and therefore *"the six extension turbines will be seen in the context of the 33 consented Muaitheabhal turbines and will not result in a significant change in wild land character on either of these search areas"* (ES para 6.155). This assessment takes no account of the magnitude of any change. It is clear from the maps provided in the ES that in many areas south and east of Loch Sealg the proposed east extension will be far more dominant in views than the main Muaitheabhal scheme.

Viewpoint 4: Uisinis – inadequacy of assessment

Apart from a single wireframe from the summit of Uisinis, there is little attempt to visualise the impact from this area – the ES citing health and safety issues as the reason Viewpoint 4, Uisinis, has no photo or photomontage. The ES states that wireframes are adequate. Unfortunately, Uisinis is possibly the most critical viewpoint for this extension and so an adequate photomontage from that point is a necessity. It is vital that this is available to test the assertion by the ES that, although the viewpoint sensitivity is *"High"*, the *"Magnitude of Change is small and that the proposed turbines of the East Extension will form a seamless extension of the consented Muaitheabhal Windfarm. The change to the view will be of small magnitude."* The wireframe does not support that assertion.

Cumulative assessment

SNH also stated in the scoping process, *"A study area of 30km radius will only be appropriate if the proposed wind turbines are less than 100m high. As described within our letter to LUC of 6 July, the extent of the study area should be based on the height of the proposed wind turbines and, for the cumulative LVIA, on the height of wind turbines within other windfarms within the area."*

However, the ES has not taken that advice and only uses a 30km radius for turbines which are 150metres high.

Whatever the reasons for the serious omissions detailed above, they make the assessment of the impact on wild land totally inadequate and the Application should be rejected due to inadequate information on a critical issue. However, even the limited information in the ES demonstrates significant impacts on one of the wildest areas in Scotland.

As Scottish Planning Policy states *"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 ".* No assessment has been made on whether this outstanding wild landscape has the capacity to accept more wind turbines without significant degradation of its qualities, other than rather superficial reassurances that there will be no significant change to the wild land character.
There is a general principle here, that the loss of wild land in increments can damage the wild land resource just as effectively as one very large, poorly sited development. The impacts on wild land – and the National Scenic Area – of the proposed extension are largely dismissed in the Environmental Statement on the basis that consent has already been granted for the Muaitheabhal Wind Farm. Indeed, no attempt is made to assess the impacts of the extension without reference to the larger, consented scheme. The Trust believes that the impacts of the proposed extension should be assessed in their own right, and not dismissed simply because a neighbouring wind development has been consented.

Peat

The proposed wind power development will be constructed almost entirely on peatland habitats – predominately wet heath and blanket bog - which act as a valuable store of carbon. Disturbance to the peat will be widespread and substantial. It is widely accepted that these fragile but important habitats are very sensitive to changes in the hydrology of the

surrounding area, and there is considerable uncertainty as to the effects of wind power development construction on such areas. Given the importance of peatlands, both ecologically and as carbon stores, the John Muir Trust believes, and it is an increasingly recognised priority in policy decisionmaking, that wind power developments should be preferentially sited away from deep peat and blanket bog sites, and directed towards less sensitive habitats.

Incorrect impact significance

The Trust also has concerns over an apparent downgrading in the ES of the impact significance of the development on blanket bog. In Tables 8.12 on page 126 of the Ecological Report, the impact significance on blanket bog (both prior to and after mitigation measures) is assessed as being *"moderate negative".* In the same table, the value given to blanket bog is *"international"* and the impact magnitude is given as *"high"*. In the next line, the impact significance on wet dwarf shrub heath is also assessed as being *"moderate negative",* whist its value is recorded as *"national"* and impact magnitude is *"high".*

Neither of these assessments for impact significance appears to accord with the matrix set out in Table 8.4 on page 116 which would indicate both should be assessed as *"major negative"* prior to mitigation.

The Trust is concerned that lower levels of impact significance have been assigned with no explanation in the text. This is particularly the case for blanket bog, where the matrix suggests that even an impact magnitude of "medium" would still warrant an impact significance of *"major".*