



Comhairle nan Eilean Siar  
Planning Service  
Council Offices  
Sandwick Road  
Stornoway  
Isle of Lewis  
HS1 2BW

21st November 2007

**Feiriosbhal Windfarm: Planning Application by Beinn Mhor Power Ltd for a 16 turbine, 48 MW windfarm**

Dear Sir / Madam

1. The John Muir Trust (JMT) objects to Beinn Mhor Power's application for the reasons detailed below.
2. The John Muir Trust works to protect and conserve wild 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. **Importance of Wild Land**

The John Muir Trust is concerned about the effects of climate change and the implications of global warming for the environment and wild land. The Trust supports Government moves to achieve reductions of carbon dioxide emissions into the atmosphere from fossil fuels, by all efficient means - increasing the proportion of energy produced by renewable energy sources, as well as by reducing energy consumption. Reducing energy consumption is of critical importance as it is widely accepted that this delivers reduced carbon emissions at least cost.

4. Renewable energy projects must be sustainable developments and should be selected appropriately, with due respect to the national importance of one of Scotland's key assets – its wild land. The Trust wishes to protect Scotland's finest wild areas and so is opposed to major developments which impact on these. The Trust's policies are set out in Appendix 1 (John Muir Trust Wild Land Policy) and Appendix 2 (John Muir Trust Renewable Energy Policy).
5. Key points of the JMT policy are:
  1. no developments in core wild land
  2. no large-scale (national/major) developments on the periphery of wild land. The concern with large-scale developments on the periphery of wild land is two fold –

- i. that the extent of the wild land is eroded by new access tracks and structures pushing closer (one definition of wild land is based upon remoteness from roads and tracks)
  - ii. that the wild quality of the land is degraded by visual intrusions from outwith it.
3. Active encouragement of small (local)-scale developments, well-designed and close to existing communities
6. On the periphery of wild land, the Trust supports the development of small-scale, sensitively-sited, renewable energy schemes in areas adjacent to existing settlements, which benefit local people and which demonstrate that renewable energy may be sourced without significantly impacting on wild land. The Trust opposes new developments where they significantly threaten wild land. The Trust is committed to sustainable land management and, therefore, opposes large, industrial-scale wind power developments which impact on wild land. The Trust also opposes the infrastructure for such developments where they impact on wild land.
7. Beinn Mhor's proposal will have a damaging impact on the neighbouring wild land of the South Lewis area. This area is identified in Scottish Natural Heritage'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.
8. NPPG14 Natural Heritage states in paragraph 16: *"The most sensitive landscapes may have little or no capacity to accept new development. Some of Scotland's remoter mountain and coastal areas possess an elemental quality from which many people derive psychological and spiritual benefits. Such areas are very sensitive to any form of development or intrusive human activity and planning authorities should take great care to safeguard their wild land character. This care should extend to the assessment of proposals for development outwith these areas which might adversely affect their wild land character."* This proposal will have a wide visual impact over a large area of land that fits the above description. This not only includes part of the South Lewis, Harris and North Uist National Scenic Area (NSA) and the South Lewis / North Harris Search Area for Wild Land, but also a much wider area of attractive landscape. This landscape, which includes the villages of South Lochs, the remote hills of Beinn Mhor along with the northern part of North Harris, would, in many mainland contexts, be considered strong candidates for a landscape designation, but in the Western Isles they fall outwith the boundary of the National Scenic Area. A development of this scale, that involves such a fundamental change of land use over such a large area, must take into account its serious adverse impact on the visual amenity of communities and landscapes in the surrounding area – whether protected by designations or not.
9. We regard the assessment of the scheme's impact on wild land to be flawed. In particular, we take issue with the Environmental Statement's categorising of impacts on wild land into "substantial / moderate / slight adverse", etc., with the lesser impacts being defined as areas where fewer turbines are visible, or where they are partly screened by topography. These lesser impacts are then used to assess the scheme's impact on wild land as "not significant". An essential feature of wild land is that buildings, structures and obvious signs of human activity are not visible, and the consequent impression of being far away from people and civilisation. Even sight of the tip of one large wind turbine can destroy that feeling of remoteness that is an integral part of the experience of visiting wild land. The effect is not a "slight adverse

impact” – the land is no longer wild land, as one of its essential attributes has been lost. Given its extreme sensitivity to visual impact, JMT believes that the resulting loss of wild land would be much greater than is estimated in the Environmental Statement, and that this would amount to a significant impact on the overall integrity of the South Lewis / North Harris search area for wild land. This effect is increased further, when the scheme is considered alongside the neighbouring Paicr scheme.

10. **If the planning authority is minded to approve this project, JMT asks that approval is qualified by requiring the developers to remove the southern four turbines from their proposal. The removal of these turbines would reduce the impact of the development on the South Lewis, Harris and North Uist National Scenic Area (NSA) and the South Lewis / North Harris Search Area for Wild Land. Furthermore, the John Muir Trust believes that a significant reduction in the height of the remaining turbines would be essential to mitigate the extensive visual impact.**
11. The proposed wind power development will be constructed almost entirely on peatland habitats, which act as a valuable store of carbon. Disturbance to the peat will be widespread and substantial, as the development will necessitate over 20km of access roads, large concrete bases for individual turbines and a number of large “borrow pits”. It is widely accepted that this fragile but important habitat is 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. The developers appear to have put little effort into establishing the likely carbon emissions resulting from disturbance of the peatland habitat. However, a report commissioned by the RSPB from the University of East London studied the impact of the proposed Lewis Wind Power development on peatland, and concluded that the developers had greatly underestimated the area of peat that could be affected by hydrological change during the lifetime of the wind power development - and consequently risked substantial carbon payback times for the project. Beinn Mhor Power appear to have taken no notice of this research, and the carbon payback times of their development are therefore unknown. Given the importance of peatlands, both ecologically and as carbon stores, JMT believes that wind power developments should be sited on less sensitive habitats.
12. There are already a large number of renewable energy proposals under consideration throughout Scotland (as of January 2007: 2566MW operational or consented; 5581MW in planning or appeal; 3652MW in scoping), and the Scottish Executive’s Climate Change Programme (2006) is confident that current renewable targets will be met: “Interest from developers is such that we judge there to be enough projects already operational and consented to allow us to comfortably meet the 2010 target, and to set us firmly on the path toward 40% by 2020”. There is therefore no overriding national importance which would justify the impact that this scheme would have on the landscape and peatland habitats, and we believe that the application for this development should consequently be rejected.

Yours sincerely,

Helen McDade  
Policy Officer