



# **Objection to Muaitheabhal Windfarm, Lewis: Addendum to Planning Application by Beinn Mhor Power Ltd and Crionaig Power**

## **Application for 39 turbines (145 metres high)**

**August 2009**

### **Summary**

1. The John Muir Trust believes that this Application should be a new application.
2. A Public Local Inquiry (PLI) Report, recently released, found that the previous version of this scheme is not justified. That Report found very substantial adverse effects on landscape and visual amenity. This current Addendum is not a minor adjustment of a previous scheme to try and address a minor adverse effect, in an otherwise satisfactory proposal. What has been presented here is a major re-configuration of the Application and, whilst the number of turbines included is less, a substantial increase in size of the turbines is proposed from 125metres to 145 metres and a completely new area for turbines is included. These are such major changes that it seems unreasonable to treat this merely as an Addendum to a scheme which has been found unsatisfactory at PLI.
3. The Trust calls on the Scottish Government to give a decision against the Application which has been examined at Public Local Inquiry.
4. The Trust and other objectors have invested very considerable time and money in assessing the previous version of this proposal and taking part in a Public Local Inquiry. The Inquiry Report did not support the development going ahead.
5. The Trust calls on the Scottish Government to give adequate time and arrangements for interested parties, particularly local people, to view and assess these significantly changed proposals.
6. The most reasonable way to do this would seem to be by deciding against the previous application and treating this as a new application, requesting the missing supplementary environmental information. If this is not done, the Trust believes that substantial further work should be done to address the concerns set out in this and other objections. Objectors have not had adequate time or facilities to fully assess the complex information and implications of the new application. It is our understanding that there have not been any local information sessions for this Addendum. The Trust would highlight that, for objectors to have acquired, in paper copy, all the volumes of Environmental Information for all the versions of this scheme would be about £600. It is very difficult to assess the visual information given from electronic copies and the costs being put on paper copies is a barrier to communities being able to examine the Developers' information. Moreover, the Trust believes the Supplementary Environmental Information 4 (SEI4) is very inadequate and, in some aspects, misleading, with regard to landscape, visual, wild land issues and the cumulative effects.

7. The Trust also believes that the economic case made is flawed – see Appendix one (Report from Professor Andrew Bain).

## Background

8. 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.
9. John Muir Trust Policies on Wild Land, Energy & Climate Change  
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 greenhouse gas emissions into the atmosphere, by all efficient means – i.e. 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.
10. 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 and natural heritage. 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 John Muir Trust’s Wild Land Policy and the Trust’s Renewable Energy Policy.
11. Key points of the Trust's policies are:
  - a. no developments in core wild land
  - b. 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.
  - c. Active encouragement of small, community-scale developments in sensitive locations
  - d. Preferentially siting industrial-scale wind developments on brownfield sites, near to the bulk of consumers
12. The Trust believes that the government’s renewable energy targets can be achieved without significantly impacting on wild land. 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. The Trust is committed to sustainable development 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.
13. **SCOPE OF COMMENTS WITHIN THIS OBJECTION**
  - o The Trust comments here on landscape, visual, wild land issues and the cumulative effect of these.
  - o The Trust also comments on economic issues
  - o The Trust also comments on peat, carbon emissions and energy targets
  - o The Trust has not had time to make any assessment of other issues in the SEI4 so “no comment” cannot be taken to mean that the Trust is content with them. We may seek the opportunity to return to them - if further investigation led to the Trust taking a view.

#### 14. THE TRUST OBJECTS TO BEINN MHOR POWER'S REVISED APPLICATION FOR THE REASONS DETAILED BELOW

### Damage to wild land

15. 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 application would have a wide visual impact over a large area of land that fits the above description.
16. The wild land in the vicinity of this Application is so important to Scotland that Scottish Natural Heritage (SNH) requested that potential impacts on wild land be considered as a separate issue, over and above landscape and visual impacts— see para 6.132 of the Application's Supplementary Environmental Information 4. Beinn Mhor's proposal, as in this latest addendum, will still have a very damaging impact on the neighbouring wild land of the Harris and South Lewis area. The "search area for wild land" in this area 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

### Wild land assessment flawed

17. SEI4, at 6.147, states *"the issue of wild land has been examined at the public inquiry into the Muaitheabhal Windfarm (in 2008)"*. In fact, as the remit of the Inquiry was confined to impacts on the National Scenic Area (NSA), the Reporter specifically confined discussion of wild land issues to the NSA area. This was agreed by all Parties, including the Trust, at the beginning of the Inquiry. Therefore, the wider issues, highlighted in para 14 in this objection, have not been examined and explored. This is particularly relevant when considering the alternative areas suggested as "search areas for wild land" by Land Use Consultants (LUC) in their previous SEI, April 2006. It is accepted by most parties that the SNH search areas are only a guide. The John Muir Trust believes that there is merit in taking LUC's previous suggested area as a better guide. This has not been done, possibly due to this mistaken understanding of the PLI's exploration of the issue. It is the Trust's contention that the issue of what is a reasonable search area is so important, it should be re-considered.
18. The Trust's view is that a proper assessment of the impact on wild land has not been done. In our opinion, that is one reason why the SEI4 conclusions underplay such impacts.
19. Accepting the constraints, at the current time, because the SEI4 has used SNH's search areas as a guide, there are still considerable concerns. No new viewpoints have been selected to assess this new application "in the round". Looking at the uneven dispersal of the viewpoints, there is only one, Beinn Mhor, in the search area which overlaps with the Application site. However, even the limited information given shows that both of the SNH search area for wild land and the previously suggested LUC search area extend further northwards into and nearer the site than the NSA. Since the PLI exploration was focused on the NSA, the wild land impact was not fully explored and it is essential that further information regarding this impact, including a further series of wireline and photomontage visualisations be made available. The John Muir Trust regards the current assessment of the scheme's impact on wild land to be badly flawed by this omission.

20. In SEI4, in para 6.174, it states that *“the visibility” of the turbines “from the summits of Beinn Mhor, Caiteseal and Uisinis is likely to erode the intensity of wild land character experienced on the northern edge of the smaller search area. ....However, the majority of the area will not be affected and impacts on the remainder of this search area is judged to be negligible (not significant).”* The Trust fundamentally disagrees with this use of the phrase *“the majority of the area”* to justify calling the impact negligible. 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 negligible – 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 SEI4, and that this Application, alongside the neighbouring Pairc scheme, would amount to a significant impact and reduction of wild land in the search area.

### Beinn Mhor, An Cliseam and Calanais

21. The only viewpoint within this search area which is used in the SEI4 assessment, Viewpoint 8: Beinn Mhor, which is assessed as just outside the NSA boundary, is assessed as suffering major impacts. All 39 turbines will be visible and are less than five kilometres away.
22. An Cliseam, the highest point in the Outer Hebrides and within the NSA, will give a view of 20 turbines. Although this is about fifteen kilometres away, the turbines are exceptionally high so will have greater impact than those assessed in the PLI.
23. Up to fifteen turbines will be visible from Calanais standing stones, identified in the SEI4 as *“one of the UK’s most outstanding prehistoric archaeological sites and a highly popular tourist attraction”*.

### National Scenic Area

24. Although in this version of the Application, unlike the Application considered at PLI, there are no turbines actually in the National Scenic Area, this does not mean it has removed all significant impacts on the National Scenic Area. The assessment of Beinn Mhor (on the boundary) and An Cliseam just two examples which show that significant impacts remain in the NSA. Moreover, the landscape which this current Application is sited in would, in many mainland contexts, be considered strong candidates for a landscape designation itself. However, in the stunning context of the Western Isles, it falls outwith the boundary of the National Scenic Area. Nevertheless, 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, as set out on para 16, NPPG14.

### Cumulative effect

25. The assessment of the cumulative effects of Pairc and Muaitheabhal is completely inadequate and misleading. Although the Zone of Theoretical Visibility (ZTV) for Muaitheabhal itself (Figure 6.2) shows numbers of turbines which might be visible from individual points on the map, the Cumulative ZTV (Figure 2.2) has used a colour coding which shows *“the potential number of windfarms visible”*. It is hard to think of a professional reason why this figure does not show the number of turbines visible. Arnish Moor (three turbines, 76m high) and Pairc (26 turbines, 145metres high), for instance, cannot be

considered as equal impacts. This assessment needs to be re-done stating the number of turbines. Even then, it is difficult to allow for the varying, and increasing, heights.

## Peat

26. 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 18km 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. Given the importance of peatlands, both ecologically and as carbon stores, JMT believes that wind power developments should be preferentially sited away from deep peat and blanket bog sites, and directed towards less sensitive habitats.

## Government targets

27. There are already a large number of renewable energy proposals under consideration throughout Scotland and the Scottish Government are confident of exceeding their 2020 target. There is therefore no over-riding national importance which would justify the impact that this scheme would have on the landscape and peatland habitats.

## Economic benefit

28. In the SEI the Applicants’ estimates of the likely effects on permanent employment in the Western Isles are greatly exaggerated. These have been analysed in a report by Professor Bain (See Appendix 1 enclosed). While the construction of the Muaitheabhal and other windfarms would produce a short-term boom in construction employment, the long-term impact would amount to only some 15 permanent jobs connected with the operation of the windfarm and the natural and cultural regeneration plan, with a further 10 full-time equivalents due to that activity. The effects on employment of the Applicants’ annual contributions to the MCWT and WIDT will depend on the revenue generated by the windfarm and on the ways in which the trusts deploy their funds, but a realistic estimate is that an average of around a further 25 jobs would be generated. The Community windfarm is unlikely to be a significant source of funding for either trust. It will come into being only if the MCWT is able to raise outside equity capital on terms which leave it with a substantial interest in the profits – not a plausible scenario. Even if it does come into being the share of profits retained by the MCWT is not likely to be sufficient to generate more than a handful of jobs, most of which would arise in the later years of the project. Overall the project could be expected to account for about 50 permanent jobs in the Western Isles, i.e. less than ½% of total employment in the region.

[Appendix 1: Report on effects on employment by Professor Andrew Bain.](#)