

MEDIA BRIEFING

Issued by:

The Association for the Protection of Rural Scotland, the Mountaineering Council of Scotland, the Munro Society, the National Trust for Scotland, Ramblers Scotland and the Scottish Wild Land Group.

1. Introduction

The organisations listed above have jointly submitted an open letter highlighting concerns over the Scottish Government's approach to assessing planning applications for major wind farm developments.

The concerns focus on two particular developments where the Scottish Government has been perceived to disregard the submissions made by its own advisors and statutory consultees Scottish Natural Heritage (SNH).

The organisations call for the Scottish Government to take proper cognisance of their own advisors where serious ecological issues are raised, and to ensure that all such evidence is transparently scrutinised and assessed, by such means as Public Local Inquiries.

The full text of the letter can be found at **APPENDIX I**.

2. The Cases in Question

The two wind farm developments where the Scottish Government's handling of planning applications has triggered the organisations' concerns are:

(i) **Stronelairst Wind Farm, Garrogie Estate, Monadhliath Mountains, Highland Region**

The Scottish Government approved Scottish and Southern Energy's plans to construct an industrial-scale wind farm in the middle of one of the country's most important, wild landscapes. At 35 square kilometres it will cover the same area as the city of Inverness and bounds a Special Area of Conservation, as well as the Cairngorms National Park.

The decision was taken in the face of opposition from the government's own advisory body, Scottish Natural Heritage; from the Cairngorm National Park Authority; and from three out of the four local councillors in Strathspey and Badenoch. Written objections to the development from the public outnumbered supporting letters by a margin of almost 15 to 1. SNH had proposed to include Stronelairst in its register of Wild Land Areas, which would have afforded the location a measure of protection from this type of development, but consent prior to release of the map meant the area did not qualify.

67 turbines, up to 135 metres tall, will be visible from across huge swathes of wild land, including the peaks of many of Scotland's iconic Munro mountains.

The environmental benefits of the wind farm are questionable given that it will be constructed using thousands of tonnes of steel and concrete placed upon peat deposits which act as a natural 'sink' for stored carbon. Each turbine requires a quantity of concrete for its foundations that would be sufficient to fill an Olympic-sized swimming pool.

Blanket bog is only found in a few parts of the world with cool and wet conditions. Bog mosses and other plants build over centuries to create a layer of carbon rich peat which can be up to 8 metres deep.

The peat lands collectively host a wide variety of vegetation and surface pool systems which in turn sustain an astonishing assortment of wildlife, including deservedly iconic moorland breeding birds such as the golden eagle and red grouse, in addition to golden plover and greenshank.

The sphagnum moss which drives peat formation holds significant amounts of water and releases it only slowly. This means it is held for long periods in the uplands before it finally filters down towards the lowlands, so providing a degree of natural regulation which helps prevent flooding.

Organic matter barely decomposes in cool, watery conditions, which means that the carbon stored in the generations of plants and animals that make up the peat is essentially locked away permanently. It represents innumerable tonnes of carbon that would otherwise be released into the atmosphere, potentially stoking global warming still further.

A wind farm of this size, in such a wild area, may set a precedent which may be exploited by developers, threatening more of the landscape and its ecosystems. We have already seen indications from SSE that they hope to establish infrastructure (not mentioned in the original planning application) – such as pylons, roadways and a huge substation – that would cause yet more damage to the site and its surroundings.

(ii) Inch Cape, Neart na Gaoithe, Seagreen Alpha and Bravo Marine Wind Farm Projects, Firths of Forth and Tay

In 2009 a number of sites were released within Scottish Territorial Waters (i.e. up to 12 nautical miles from the shore). In the Forth and Tay area these included the Inch Cape and Neart na Gaoithe offshore wind proposals. In 2010 a third round of leasing included large sites located beyond the Scottish Territorial Waters with the relevant site in the Forth and Tay area being Seagreen's Alpha and Bravo sites.

In October 2014 developments were consented for 335 turbines following an “Appropriate Assessment” carried out by Marine Scotland.

In this instance, the assessment considered the impact of the proposed turbines on a number of internationally important seabird colonies in the region, including Fowlsheugh, Isle of May and St Abbs National Nature Reserves, the Bass Rock and other islands in the Firth of Forth. The assessment determined that each year the proposed wind farms are predicted to kill 1169 Gannets, 424 Kittiwakes and 1251 Puffins.

The assessment also shows that over 25 years this rate of attrition will reduce the breeding populations of these three species in the nearby Forth Islands by 21%, 24% and 25% respectively. Not surprisingly, the Scottish Government's nature conservation advisor, SNH, drew attention to this.

The Scottish government maintains that “strict conditions” imposed on developers will mean any impacts on seabirds and wildlife will be closely monitored and mitigated. But SNH responded when asked that it was unable to guarantee that the region's breeding seabirds would not be adversely affected by the proposed offshore wind projects:

“Regarding the cumulative effects on breeding seabirds, our position as stated in our advice to Marine Scotland (jointly provided with the Joint Nature Conservation Committee) was that we could not conclude with reasonable certainty that there would be no adverse impact arising from the Forth and Tay wind farms on the site integrity of Forth Islands or Fowlsheugh SPAs.”

SNH admitted that coming up with a “workable solution” that permitted viable development while keeping to European SPA conservation objectives had been challenging for these projects due to “a lack of established, tried and tested methods” in setting impact thresholds.

Marine Scotland and the Scottish Government have somehow arrived at the conclusion that the predicted rate of slaughter was acceptable, despite the fact that it will contravene European conservation measures. Once again, it appears that the Scottish Government decided to disregard the informed opinion of its own advisors and thus far there has been no fair and transparent scrutiny of the issues raised.

3. Attributable Quotations

EMBARGOED UNTIL MONDAY, 9 FEBRUARY 2015

- John Milne, Co-ordinator, Scottish Wild Land Group:

“Industrial developments, such as these huge windfarms, have no place in our wildest landscapes.

“Stronelaireg, with its turbines, roads, tracks, power stations and other transmission infrastructure will fundamentally alter the character of the entire Monadhliath Mountain range.

“Scotland is renowned for its beautiful mountain landscapes, which are part of our national identity and underpin our tourist industry. Scottish Government decision-making too often ignores expert opinion and prioritises claimed economic gain over the need to protect nature and our environment. Research shows that Scots want our wild land protected for everyone’s benefit *”

ENDS

- Terry Levinthal, Director of Conservation and Projects, The National Trust for Scotland:

“We at the National Trust for Scotland are not opposed to renewable energy developments by any means – but we think they should be located appropriately and be proportionate in scale.

“We count on the Scottish Government to have in place a fair and transparent process that ensures proposed developments are properly scrutinised and that important ecological factors are considered fully. Unfortunately, the evidence from Stronelaireg and the Forth and Tay wind energy projects suggests that even the expert opinions of the Government’s own advisors can be brushed aside if they are inconvenient.

“For our faith in the Scottish Government’s decision-making to be restored, it must commit to taking heed of SNH and other statutory consultees’ advice and reviewing their submitted evidence in the public realm.”

ENDS

* See <http://www.jmt.org/news.asp?s=2&cat=Campaigning&nid=JMT-N10918>

5. Contacts for Further Information/Interview Requests

- The Association for the Protection of Rural Scotland
Contact John Mayhew on 0131 225 7012 and by e-mail at info@ruralscotland.org
- Mountaineering Council of Scotland
Contact David Gibson, Chief Officer on 07845-919150 / 01738-493942, e-mail: david@mcofs.org.uk
- The Munro Society
Contact Peter Willimott by e-mail at peterwillimott@valleyfield.fsbusiness.co.uk
- The National Trust for Scotland
Contact Jim Whyteside on 0844 493 2425/ 07889 456779/ Sarah Cuthbert-Kerr on 0844 493 2483/ 07713 786277.
- Ramblers Scotland
Contact Helen Todd, Campaigns & Policy Manager on 01577 861222, e-mail: Helen.todd@ramblers.org.uk
- The Scottish Wild Land Group
Contact John Milne, Co-ordinator on 07933 312811

APPENDIX I

EMBARGOED UNTIL MONDAY, 9 FEBRUARY 2015

Monday, 9 February

FOR PUBLICATION

Sir,

Few people dispute the necessity of first reducing our energy use, and then substituting the use of fossil fuels with renewable energy alternatives, to help address the challenge of climate change. However, as we have seen, there is public disquiet about proliferation of energy developments in Scotland's wild land areas.

It is vital that any decisions on the location of these developments rely on the fair and impartial assessment of all pertinent information and points of view. The people of Scotland depend on their Government to ensure this happens. Unfortunately, we do not believe that the Scottish Government is doing this in a consistent manner with wind farm developments.

In the face of evidence and objections from many different organisations, communities and individuals, the Scottish Government has approved proposals to site colossal wind farms inland, at Stronelaig in the Monadhliath Mountains, and offshore, straddling the Firths of the Forth and Tay. In both cases the Scottish Government chose to ignore the views of its own expert advisors from Scottish Natural Heritage (SNH). Their advice made it absolutely clear that the impact from these turbines will be very significant, and that the locations were problematic as a result. It seems iniquitous to us that, having put in place a planning system which invites the expert views of statutory consultees, the Scottish Government too frequently ignores them if they prove inconvenient. At the very least, evidence of this calibre from SNH should trigger Public Inquiries.

We therefore call on the Scottish Government to commit to taking cognisance of its own advisors. Rather than force objectors to challenge these decisions in the courts at great expense, the Scottish Government should first ensure they have been exposed to the proper and democratic scrutiny that their scale and potential impact warrants.

John Mayhew, Director, the Association for the Protection of Rural Scotland

Brian Linington, President, Mountaineering Council of Scotland

Peter Willimott, President, the Munro Society

Sir Kenneth Calman, Chairman, the National Trust for Scotland

David Thomson, Convener, Ramblers Scotland

John Milne, Co-ordinator, Scottish Wild Land Group