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Ms Carlyne Paton
Senior Case Officer
Energy Consents Unit
The Scottish Government
Energy Consents Unit planning reference: ECU00003304
Sent by email: Econsents_Admin@gov.scot

10 January 2023

Dear Ms Paton,

Further comments in response to Revised Draft NPF4: Bunloinn Wind Farm and battery storage proposal

We welcome the opportunity to provide further comments on EnergieKontor's application for the Bunloinn Wind Farm (Energy Consents Unit reference ECU00003304) ('the Proposed Development') following the publication of the Revised Draft National Planning Framework 4 ('Revised Draft NPF4'). We understand that NPF4 is still to be approved by the Scottish Parliament before it can be formally adopted, however we are grateful for the opportunity to respond at this stage.

We previously submitted an objection to the Proposed Development dated 13 October 2022 in which we raised concerns regarding the adverse impact on the wild land qualities of the WLA.18 Kinlochhourn – Knoydart – Morar and WLA.24 Central Highlands. We also believed that the Proposed Development would be an exception to the existing pattern of wild farm development in the area. The John Muir Trust supports the Scottish Government's bold and ambitious net zero by 2045 target and understands the role that renewables, including onshore wind, have in meeting this target. However, our concerns over the impact of this development remain.

Specific points in response to Revised Draft NPF4

The policies referred to below are within the Revised Draft NPF4.

Biodiversity

We welcome the recognition given to the importance of restoring and enhancing biodiversity in Policy 3. The John Muir Trust believes that society is enriched when nature has the freedom to repair itself. When given the freedom, nature can create solutions to protect biodiversity and reverse its rapid decline, whilst also benefiting people and communities. On this basis, we welcome the condition outlined in Policy 3(b) that national developments will only be supported where it can be

demonstrated that the proposal will *'conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention'*.

We believe that the Proposed Development fails to comply with Policy 3(b)(iv) which requires national developments to provide *'significant biodiversity enhancements... in addition to any proposed mitigation'*.

The Proposed Development outlines seven measures in the Outline Habitat Management Plan ('OHMP') intended to improve biodiversity within the wider site (page 7, OHMP). However, only two of these measures are commitments to directly enhance biodiversity, namely the re-wetting of bogs and the creation of riparian woodland. The lack of clarity on the extent of both measures is cause for concern.

The Non-technical Summary highlights the biodiversity net gain that is associated with the peatland restoration (section 8.6, page 17) however also states that *'the primary aim of avoidance has been maintained so that limited mitigation is required'* (section 8.5, page 16). As there is no detail on the extent of peatland restoration proposed and the potential need for up to 71,214.05m³ of peat to be excavated (page 6, OHMP), it is not clear on what basis it can be concluded that there will be biodiversity net gain associated with the peatland restoration. The extent of riparian woodland to be created is also not specified, in fact it is only stated that this measure will be *'explored'* (page 7, OHMP).

Other measures in the OHMP include an intention to discuss support for the monitoring and management of common scoter and golden eagle with the RSPB and the Highland Raptor Study Group and an analysis of deer numbers to inform deer management. However, given that no commitment is made, either to the form or the extent of this support, it cannot be known whether this will contribute to a net gain in biodiversity. The remaining measures in the OHMP are mitigations to reduce the adverse impact of the development.

We believe that there is insufficient information to determine that the Proposed Development will go beyond mitigation to provide significant biodiversity enhancements as required by Policy 3(b)(iv). We would be grateful for clarity on how EnergieKontor intend to demonstrate (with evidence) compliance with Policy 3 as it is not addressed in their Planning Statement Addendum to the Revised Draft NPF4 published in December 2022 and no reference is made to nature networks in the OHMP.

Energy

Policy 11(e) requires that project design and mitigation addresses significant landscape and visual impacts (Policy 11(e)(ii)) and cumulative impacts (Policy 11(e)(xiii)). Although it is recognised that visual impacts are to be expected from some forms of development (Policy 11(e)(ii)), careful consideration should be given to whether the project design and mitigation has addressed the significant visual impacts on the landscape.

The Proposed Development represents a departure from the existing pattern of development in the area, as was recognised in the application for the nearby Tomchrasky Wind Farm ('Tomchrasky') (Energy Consents Unit reference ECU00004663). The Assessment of Cumulative Effects (Appendix 5-5) for the Tomchrasky application states that *'[a]ll but one of the cumulative wind farms are set alongside existing schemes'*, the Proposed Development being the one exception (section 1.1, page

4). The assessment noted that the Proposed Development would create a *'new turbine group'* in the area (section 3.2, page 12).

We believe that the siting of the Proposed Development outwith the existing pattern of development is a failure in design and mitigation and has led to predicted significant landscape and cumulative impacts. These impacts have been assessed as *'significant'* at section 6.23 (page 8) of the Landscape Visual Impact Assessment, which states *'[a]ll of the viewpoints (1, 2, 3, 4, 6, 7, 8, 9 and 10) include cumulative visibility of other existing wind farm development and the proposed development would have a significant and cumulative (additional and combined) effect on these viewpoints'*. We are also concerned about the possibility that the Proposed Development will represent the beginning of an encroachment of development further west into an area of exceptional beauty, demonstrated by its proximity to three National Scenic Areas (Glen Affric, Kintail and Knoydart).

In conclusion, we believe that the Proposed Development has failed to evidence that it will enhance biodiversity and therefore does not satisfy Policy 3. We also believe that careful consideration needs to be given to whether Policy 11(e)(ii) and (xiii) have been discharged. Considering these pending questions, we believe that Policy 4(a) has not satisfied and our objection to the Proposed Development remains.

Yours sincerely,

The John Muir Trust