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Ms Ruth Findlay
Energy Consents Unit
The Scottish Government
Energy Consents Unit planning reference: ECU00001844
Sent by email: Econsents_Admin@gov.scot

25 January 2023

Dear Ms Findlay,

Further comments in response to NPF4: Energy Isles Wind Farm

We welcome the opportunity to provide further comments on Energy Isles Limited's ('EIL') application for the Energy Isles Wind Farm (Energy Consents Unit reference ECU00001844) ('the Proposed Development') following the approval of NPF4.

We previously submitted an objection to the Proposed Development dated 26 October 2020 in which we raised concerns regarding the adverse impact on wild land and peatland. We maintained our objection (dated 28 October 2021) following the second round of Additional Information provided by EIL.

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. We also support the expansion of community renewables for local benefit and therefore the intention of Energy Isles Limited to retain benefits within Shetland. However, we believe that the Proposed Development would have an unacceptable impact on an area within the top 10% of wildest areas of Scotland, and the essential nature-based solutions it provides to both the climate crisis and biodiversity loss. As such, we must maintain our objection.

Specific points in response to NPF4

The policies referred to below are within the NPF4.

Significant impact on priority peatland habitat

We believe that the siting of the Proposed Development, on a site largely comprising of Class 1 peatland, fails to comply with a number of policies in NPF4.

Policy 5 (c) outlines the only circumstances in which developments on priority peatland habitat will be supported. The only subsections which could apply to the Proposed Development are:

- I. *‘Essential infrastructure and there is a specific locational need and no other suitable site; or*
- II. *The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets’*

We are not aware of any specific locational need for the siting of the Proposed Development and believe there are certainly other more suitable sites, particularly those not comprising priority peatland habitat.

The siting of the Proposed Development also brings into question its contribution to greenhouse gas emission targets.

Rather than *‘optimis[ing] the contribution of the area to greenhouse gas emission reduction targets’*, the Proposed Development would compromise the capacity of the priority peatland habitat to provide an essential ecosystem service as a natural carbon store. Not only would it adversely impact this nature-based solution to climate change and biodiversity loss, but it would turn the peatland into a net emitter of carbon, in that respect this development does not contribute towards our greenhouse gas emission targets and risks, in the long term, undermining these targets. This risk is further compounded by the fact that the proposed peatland restoration intended to off-set carbon emissions resulting from the Proposed Development cannot be counted as contributing to GHG emissions targets.

The siting of the Proposed Development on priority peatland habitats will generate more GHG than it would if it had been sited on mineral soil. Therefore, the Proposed Development has not been sited and designed to minimise lifecycle greenhouse gas emissions as far as possible, as per Policy 2(a). Research undertaken by Smith et al (2013) into the construction of wind farms on undegraded peatlands concluded that *‘when projected changes in emission factors are accounted for [i.e as fossil fuel energy generation is phased out], the potential for [carbon] saving is very much reduced and more peatland sites will show no net [carbon] saving’* (section 5, page 590). This factor was recognised in the recently published Draft Energy Strategy and Just Transition Plan where it was stated that *‘...there is potential for development in an area of deep peat to have a net negative carbon impact’* (page 65). Further the research paper states, *‘[e]ven if constructing wind farms on undegraded peatlands is of value in reducing [carbon] emissions today, it is not likely to be so in the future’* (Smith et al (2013), section 5, page 590). This is particularly pertinent when considering that the Scottish Government currently has an ambition to achieve up to 8-11GW of offshore wind in Scottish waters by 2030 (page 59, Draft Energy Strategy and Just Transition Plan). The lifecycle greenhouse gas emissions associated with the Proposed Development are only set to increase with the additional infrastructure required to connect the development to the grid. As a result, the Proposed Development does not appear to comply with the requirement under Policy 2(b) that development proposals will be *‘sited and designed to adapt to current and future risks from climate change’*.

Policy 1 of NPF4 requires *‘[w]hen considering all development proposals significant weight will be given to the global climate and nature crises’*. We have outlined above why we think the proposal does not comply with Policies 5 and 2 and, as a result, would not support Policy 1.

Peatland restoration targets

The importance of the contribution that healthy peatlands stand to make towards the climate and biodiversity crises is demonstrated by the Scottish Government's commitment to a £250 million ten-year funding package to support peatland restoration, with a target of restoring 250,000 hectares of degraded peatland by 2030. In December 2022, the UK Climate Change Committee ('CCC') reported that Scotland has consistently missed its peatland restoration targets (page 70, Progress in reducing emissions in Scotland, December 2022). Although in 2021 there was a significant increase with 8000ha being restored, this is still far from the 20,000ha target. Particularly considering that the target is significantly less than the CCC's recommendation of 45,000ha annually by 2022 (page 70, Progress in reducing emissions in Scotland, December 2022). The adverse impact of the failure to meet our peatland restoration targets is compounded where developments, such as the Proposed Development, are permitted on the healthy peatlands that already exist. To maximise one of our most effective nature-based solutions for reducing greenhouse gas emissions, we need to both protect healthy peatlands and increase efforts to restore degraded peatlands throughout Scotland. Under Policy 1, the contribution of peatlands to both the climate and biodiversity crises should be given significant weight.

Carbon calculator

It is claimed that the Proposed Development will have a pay-back period of 1.7 years. This assessment has been made using the Scottish Government's carbon calculator. However, since being published in 2008 many have recognised that there are significant issues with the calculator. This includes Professor Jo Smith of the University of Aberdeen who was part of the team which created the calculator who said that *"[t]here's now more information available that could help reduce two uncertainties: the extent of drainage, and the efficacy of restoration of peatlands. Therefore, I'd completely agree with reviewing it."*¹ Clifton Bain, advisor of the IUCN UK Peatland Programme, said: *'[t]here's a risk that impact is being significantly underestimated. I think that's highly possible, because it's based on assumptions, based on outdated data, there's no oversight of how the model is used'*². The commitment by the Scottish Government to provide adequate tools and guidance to inform the assessment of net carbon impacts of development proposals on peatland (Onshore Wind Policy Statement, page 65) appears to suggest a recognition that the Carbon Calculator in its current form does not adequately do this. Without the tools to provide an accurate picture of the emissions being released from constructing wind developments on peat, the pay-back period and the greenhouse gas emission estimates for the Proposed Development should be considered with caution.

Energy

The support for wind farms in Policy 11 cannot be considered in isolation, it must be considered alongside the other relevant policies in NPF4. As outlined in NPF4, *'[i]t is for the decision maker to determine what weight to attach to policies on a case-by-case basis. Where a policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies'* (page 98).

¹ [Climate pollution from wind farms on peat 'underestimated' | Wind Energy News \(wind-watch.org\)](#)

² <https://theferret.scot/wind-farms-peat-climate-pollution/>

Conclusion

Significant weight should be given to the substantial contribution that the peatlands on the site of the Proposed Development already make to the climate and biodiversity crises. Not to mention the health and wellbeing benefits for the people living in Scotland, which Scotland's new planning policy is lawfully obligated to contribute to (NPF4, page 95). For the reasons stated above, we believe that the Proposed Development has an unacceptable impact on the natural environment, and the ecosystem services it provides, and fails to comply with a number of policies including Policy 1, 2, 4(a) and Policy 5.

Yours sincerely,

The John Muir Trust