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Debbie Flaherty
Manager
Energy Consents Unit
Energy Consents Unit planning reference: ECU00004758
Sent by email: Debbie.Flaherty@gov.scot

16 May 2023

Dear Madam,

Objection: Creag Riabhach Wind Farm s36C Variation

The John Muir Trust (the 'Trust') recognises the benefits of maximising the potential of existing wind farms to reduce the development of new areas to meet our energy targets. However, the decision to extend the operational period of developments or repower sites, should be made on a case-by-case basis and take into consideration the capacity of land as a finite resource to deliver for Scotland now and in the future. The Trust has significant concerns that the application to extend the operational period of the Creag Riabhach Wind Farm (the 'Proposed Variation') is not justified and therefore **objects**.

1. There is no explanation on why the Proposed Variation is being sought so soon after the development was commissioned in February 2023. By requesting permission for the Proposed Variation now, rather than at the end of the consented period, the Applicant is unnecessarily asking Scottish Ministers to predict Scotland's land use priorities in 2063.
2. Scotland's energy landscape is rapidly changing. Offshore wind energy technology has a much higher capacity factor and individual turbine capacity (resulting from taller turbines) than onshore wind energy. The significance of onshore wind energy will decrease in the coming years as offshore energy develops and makes a more substantial contribution to meeting our net zero target. Yet the Proposed Variation assumes that the contribution of the Creag Riabhach Wind Farm to meeting our net zero targets will hold the same weight in 40 years.
3. It is surprising that the Applicants were not aware of the longevity of the technology they were proposing at the time of the original application. Developers must do all they can to reduce iterative applications, they are a drain on the already limited resources of planning authorities and hinder a comprehensive assessment of the impacts of a development at the initial planning stage.

4. The extension of the operational period of any turbines within the Foinaven - Ben Hee Wild Land Area should be considered within the new policy context which provides greater protection to peatlands under Policy 5 of NPF4.

For the reasons stated above, the Proposed Variation is not justified and we believe should be refused.

Yours sincerely,

The John Muir Trust