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Energy Consents Unit  
The Scottish Government  
Energy Consents Unit planning reference: ECU00004829  
Sent by email: [Econsents\\_Admin@gov.scot](mailto:Econsents_Admin@gov.scot)

11 September 2023

Dear Sir/Madam,

### **Objection: Glen Ullinish II Wind Farm**

It is with regret that we note our objection to the section 36 application submitted by Muirhall Energy Ltd seeking approval and deemed planning permission for the construction and operation of the 47 turbine Glen Ullinish II Wind Farm (Energy Consents Unit reference ECU00004829).

We are a conservation charity that supports the Scottish Government's net zero emissions target. We also support the continued protection of Scotland's wild land as a finite national asset that contributes to the health and wellbeing of present and future generations. We are objecting to this application principally because of its significant adverse impact on wild land and nationally important peatland.

#### **Adverse impact on wild land qualities**

1. The site of the Proposed Development has many indicators of wildness; it is surrounded by areas within the top 10% of wildest places in Scotland<sup>1</sup>; is in close proximity to a number of areas protected for nature (including the Cullins SPA, Sligachan SSSI, Sligachan Peatland SAC, Talisker SSSI, Inner Hebrides and the Minches SAC) and many rare and protected bird species have been recorded in baseline surveys of the site.
2. The site is within a wider landscape of craggy and rugged coastline which includes Oronsay Island, Harloch Island and Bharcasaig Bay all of which were chosen as people's favourite wild places in the John Muir Trust's recent survey of Wild Places in the UK<sup>2</sup>. The lack of manmade structures and a sense of remoteness were cited as being some of the key features that made

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<sup>1</sup> Analysis and cartography provided for the John Muir Trust by Wildland Research Institute (WRI), University of Leeds

<sup>2</sup> <https://www.johnmuirtrust.org/whats-new/news/1350-building-the-uks-first-register-of-wild-places>

these places special. The figures in Volume 5 show that the Proposed Development would have a significant impact on the wild coastline close to the site.

### Significant peatland impact

2. The John Muir Trust considers peatlands to be wild places and welcomed the increased protection for this important habitat and natural carbon storage solution in Policy 5 of the National Planning Framework 4 ('NPF4'). Onshore wind presents a particular threat to peatland hydrology, habitat biodiversity, and carbon storage.
3. The peatland at the site of the Proposed Development is high quality Class 1 peatland which is well covered with Calluna and cotton grass. One concerned member of the public has conducted basic peat probing on the site measuring a depth of 3m and still met no resistance. This is nationally important peatland which is likely to be of high conservation value.
4. The total volume of peat to be excavated for the Proposed Development is estimated to be 613,417m<sup>3</sup>. As part of our work, we monitor onshore wind farm developments proposed on peatland, carbon-rich soils or priority peatland habitat. The Proposed Development would have a much more significant peatland impact than any of the other developments we have noted<sup>3</sup>.
5. The majority of the peat that will be excavated (356,994m<sup>3</sup>) is high quality, carbon rich, unmodified peat<sup>4</sup> and Table 11 of the Outline Peat Management Plan shows that 78,710m<sup>3</sup> (22%) of this peat will not be reused. The Summary of Significant Effects states that the significant impact of the Proposed Development on areas of unmodified peat both <1m and >1m will be Moderate and Major respectively, and that the *'significance of effect is unchanged with the implementation of the recommended mitigation measures'*<sup>5</sup>.
6. By siting the Proposed Development almost entirely on Class 1 peatland there appears to be a lack of any meaningful attempt to avoid disturbance of undeveloped peat in compliance with the mitigation hierarchy as per Policy 5 of the NPF4. It seems some effort has been made to minimise the peatland impacts through the design and layout of the Proposed Development to avoid areas of deep peat, however we would expect to see some attempt at avoidance in recognition of the intention of Policy 5(a) of NPF4.
7. Reliance on the reuse of excavated peat to mitigate the impact of the Proposed Development assumes that peat can be easily reused without any significant impact on quality; this assumption is contrary to expert opinion. The IUCN's recent briefing on Peatlands and Development states that *'the assumption that [peat] can be easily reinstated ignores the complexity of peatland structure and function.... Peat structure is an important element of how (for bogs in particular) hydrology is regulated, and any disruption permanently degrades this regulation. The result of this is that it is unlikely to maintain saturation without further consideration to its hydrology and this therefore runs the risk of carbon loss through oxidation and erosion'*<sup>6</sup>.
8. We welcome the suggestion that there will be peatland restoration at the site however the Outline Peat Management Plan fails to make any specific commitment to the extent of peatland

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<sup>3</sup> Quantans Hill Wind Farm (ECU ref. ECU00003399) with 21 turbines is estimated to require 38,936m<sup>3</sup> of peat excavation (Appendix 8.3: Peat Management Plan) and Loch Liath Wind Farm (ECU ref. ECU00002182) with 13 turbines is estimated to require 38,512m<sup>3</sup> of peat excavation (Appendix 7.3: Outline Peat Management Plan)

<sup>4</sup> Section 8.2, Outline Peat Management Plan

<sup>5</sup> Section 15.17, Volume 1, Chapter 15, Summary of Significant Effects

<sup>6</sup> <https://www.iucn-uk-peatlandprogramme.org/resources/briefings>

restoration that will be undertaken. The quantity of peatland restoration required must be reflective of the significant impact the Proposed Development would have on high quality peatland.

### **Carbon impact**

9. Siting the Proposed Development on high quality peatland is estimated to be responsible for over 50% of the overall CO<sub>2</sub>e losses expected from the construction and operation of the Proposed Development<sup>7</sup>. The carbon impact of siting the development on peatland diminishes the development's contribution to reducing GHG emissions. The same onshore wind farm sited on mineral soil would have a much smaller carbon impact, shorter payback period and would therefore make a bigger contribution to decarbonising the electricity grid.
10. Further, as acknowledged in the Carbon Balance Assessment, the contribution of the Proposed Development to reducing CO<sub>2</sub>e emissions will become less significant as the electricity mix in the grid changes and energy from renewable energy sources increases. This is starkly demonstrated in Section 14.10<sup>8</sup> which states that when the expected electricity grid mix for the lifetime of the Proposed Development is used (rather than the current grid mix) the payback period for the Proposed Development increases from 1.6 years to 12.3 years. There is no guidance on what is considered an acceptable payback period, but 12.3 years would be a substantially higher than any other onshore wind development we are aware of.
11. Academics have warned that wind farms constructed on peat will have a minimal net carbon benefit beyond 2040.<sup>9</sup> As the proportion of renewable energy in the UK energy mix continues to increase, there will be a point in the future when onshore wind on peat will displace other forms of renewable energy rather than fossil fuels. This development's predicted 40-year operational lifetime means it would still be operational at a time when the predicted net carbon benefits of wind farms on peat become negligible.

### **Energy targets**

12. The recently published Onshore Wind Policy Statement established a goal of 20GW of installed onshore wind capacity in Scotland by 2030. As of July 2024, Scotland has approximately 24 GW of onshore wind capacity which is operational, and in the pipeline<sup>10</sup>. It is acknowledged that not all of this will become operational, but we are certainly close enough to meeting the 2030 onshore wind target that we do not need to accept development on unsuitable sites.

In conclusion, we believe that we are close enough to meeting our onshore wind capacity targets that we don't need to tolerate the unacceptable impact the Proposed Development would have on

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<sup>7</sup> 358,000 tonnes of CO<sub>2</sub>e of a total estimated 580,041 tonnes of CO<sub>2</sub>e would be from ecological carbon losses. Section 14.1.3, Appendix 14.3 Carbon Balance Assessment

<sup>8</sup> Appendix 14.3 Carbon Balance Assessment

<sup>9</sup> Wind farms on undegraded peatlands are unlikely to reduce future carbon emissions, Jo Smith n, Dali Rani Nayak, Pete Smith, Energy Policy, 2014

<sup>10</sup> <https://www.gov.uk/government/publications/renewable-energy-planning-database-monthly-extract>. Including development status: under construction, planning application submitted, planning application granted, operational, finished, appeal lodged, appeal granted and revised.

an area with many indicators of wildness and which is high-quality peatland. On this basis we believe that this development should be refused.

Yours sincerely,

The John Muir Trust