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The Scottish Executive,
Energy Consents Unit,
2nd Floor,
Meridian Court,
5 Cadogan Street,
Glasgow
G2 6AT

17th July 2009

Dear Sir or Madam,

Viking Energy Partnership Windfarm

The John Muir Trust (JMT) wishes to lodge a **formal objection** to the planning application by Viking Energy to develop a 150 turbine wind farm on mainland Shetland.

The John Muir Trust believes that this scheme should be refused. If the Scottish Executive does not wish to refuse the proposal, it is imperative, for a scheme of this scale, that a Local Public Inquiry be held to examine the issues in more detail.

Grounds for objection

The John Muir Trust opposes this application because of the following grounds:

- The size and scale of this development is not reasonable, in relation to the area of mainland Shetland, and will very significantly impact on that island
- It is not reasonable to consider an application of this size and scale as a single development
- However, if these 150 turbines are to be considered as a single development, for planning purposes, the transmission infrastructure – substations and sub-sea cable- which is necessary to enable this development to be of any use must also be considered in the same process
- There would be major adverse visual and landscape impacts, including cumulative, of the proposed development
- There would be significant adverse ecological impacts
- There would be significant adverse impacts on peat, taking into account carbon release; ecological disturbance and other adverse impacts

- The way in which alternatives were assessed is not reasonable
- Government energy policies do not require this damaging proposal to proceed
- Evidence suggests that there would be significant adverse impacts on tourism, recreation and the Shetland economy

Background

The John Muir Trust is a Scottish based, UK charity whose aim is to conserve and protect wild places with their indigenous animals, plants and soils for the benefit of present and future generations, and to increase awareness and understanding of the value of such places. The John Muir Trust is concerned about the effects of climate change and the implications of global warming for people, the environment and wild land. The John Muir Trust supported the introduction of strong Climate Change Bills, incorporating targets of 80% greenhouse gas (GHG) reductions by 2050 – based on the Intergovernmental Panel on Climate Change conclusions in its 2007 Reports. The John Muir Trust has only submitted objections to nine wind development planning applications in Scotland over the past five years.

It is within that context that the Trust makes this submission.

Size and scale

The Non Technical Summary (NTS) is the part of the ES which is used by most of the public who will be affected and it is totally inadequate. For example, the paragraph on access tracks does not give the amount of new track which will be required – actually 118km – so the public cannot reasonably assess the scale of the development from the NTS. There are numerous other omissions which would be expected in a reasonable NTS. The Applicant should have to provide more detailed information to the public and other parties.

This proposal is described by the developers as a “community” project and the Environmental Statement (E.S.) stresses this aspect and the benefits they claim will result. However, another description might be that this is a huge industrial development – it would be one of the largest in Europe – on what is a small island. As such, it will dominate the vast majority of the island. The application, depending on which of the various boundaries given in the E.S. are used, occupies between 13 and 20% of the Shetland mainland. Due to the shape of that island, it will dominate an even bigger percentage of that mainland and adjacent islands.

Single application

If this application was on the Scottish mainland, there is little doubt that it would have been put forward in several different applications – probably four. The applicant tacitly acknowledges the discontinuity of the proposal by dividing the application into four “quadrants”. It may be that one or more of those, considered separately, would be acceptable, regarding local environmental and social impacts. However, the difficulties of this project have led to such a huge proposal. In landscape and visual impact terms, the question is what number and size of turbines is excessive, in this setting. This question was not considered in this application because of the necessity for about 600 MW to “justify” a subsea cable. The applicant could not consider this to be too much as it is all, or nothing – using the current model.

Transmission infrastructure

Given that these 150 turbines are being put forward together as one application, and that the subsea cable is essential for this to go ahead, the application for the subsea cable and associated infrastructure must be put forward to be considered together with this.

Visual and landscape impacts

It is our view that a development of this scale, with its associated roads and transmission infrastructure, will still have a serious and hugely damaging detrimental impact on the landscape and visual quality of these unique and outstanding islands. Due to the relatively flat topography, there is very little screening and views from all around the Shetland mainland are affected. The ES itself gives figures showing that about one-third of the views from the viewpoints and buildings assessed would have significant adverse effects. Most Environmental Statements are at pains to show there are hardly any significant effects. This one takes a different tack, stating *“In conclusion, the majority of significant effects upon the visual amenity of Shetland would occur within 15km of the periphery of the proposed Viking Wind Farm. These would generally be located in the central and northern mainland and parts of Yell and Whalsay, where views are orientated towards the proposed development.”* The matter-of-fact way in which this is stated does nothing to alter the position that the fact that the significant impacts are mostly within 15km (there being mostly sea beyond that) is incredibly worrying since that is where most of the Shetland mainland is.

The Trust has not had the capacity to calculate the number of significant adverse impacts detailed in this application, at this stage, but it is clear that **this is an unimaginable level of impact and unlike any predicted level the Trust has seen in other applications.**

Ecological impacts

The NTS states that *“Significant negative effects are likely to be caused to the blanket bog and mire communities on the site, and it is partly for this reason that a Habitat Management Plan has been developed which will provide compensatory habitat enhancement elsewhere within the planning application area.”* Habitat Management Plans should not be used as a substitute for selecting a site with due care to avoid important habitats.

The NTS notes that the condition of the blanket bog habitat ranges from good to poor but it should be noted that the figures given for this, figures 10.7 – 10.11 show considerable amounts of intact bog. These figures are inadequate to assess the whole area, as they only show survey work where the developer expects to site infrastructure. Survey results over a wider area should be available. Nevertheless, the results given show that this area has important blanket bog areas.

The statistics given in the NTS make it clear that this is a very important area for several bird species – and, for several of them, the numbers present on the site are nationally and regionally significant.

Adverse effects on peat

There are several aspects to be considered. Peat is a very important store for carbon and inappropriate development could release significant amounts of carbon into the atmosphere – the very issue which has led to the regime which is bringing forward this

development so far from the need for its electricity. The ES itself gives figures of a “carbon payback period” of between 2.3 years and 14.9 years. In fact, there is major uncertainty about how much carbon might be released from such developments and the Trust believes that a precautionary approach should be used. It makes little sense to develop such a major windfarm on deep peat when it could be sited on suitable land on the UK mainland, nearer the consumers its electricity is for.

Another aspect of concern is the risk of peat slides. These could have major impacts on the residents and also would contribute even more to the carbon released into the atmosphere. The ES acknowledges there are considerable concerns about peat slides.

Alternatives to this site

The consideration of alternatives is given in the NTS as if the output from the development is for Shetland – listing various other renewable options and dismissing them as not practical for Shetland. This is not the case – the production is for the population much further south in the UK.

In fact, there are two very different partners in the Applicant, Viking Energy Partnership. The alternatives that Scottish and Southern Energy should have included would be to seek other renewable energy opportunities on the Scottish and UK mainland nearer consumers, and on sites which were not deep peat, for instance.

The alternatives that the local partner, Viking Energy Ltd., could have considered would be smaller, genuinely “community-scale” renewable energy schemes which could contribute to supplying local needs. They could learn from the expertise and innovation in their local Pure project on Unst to utilise intermittent wind energy to produce hydrogen and use it locally for developing local businesses, etc. This is one example of many now emerging around the country of more innovative, more sustainable, decentralised production and use of electricity.

So the evidence is not given that genuine consideration was given to less damaging alternatives.

Energy policies and targets

The Trust does not consider this application is required for the success of government or local authority targets and policies. The Scottish Government figure given in December 2008 for installed and consented renewable energy capacity in Scotland was 5.5GWs out of a total target for 2020 of 8.4GWs. More large schemes have been brought onstream since then. It is untrue to portray this application as essential for either Scottish and UK renewable targets.

Both UK and Scottish Governments have indicated, in their Climate Change Bills, that the highest priority should be given to reducing greenhouse gas emissions. Following on from that, it should be noted that renewable energy targets are a secondary target – they exist primarily to contribute to the top priority target of reducing greenhouse gas emissions.

Government carbon emissions reductions targets can be more efficiently achieved by concentrating on energy conservation and efficiency measures and tackling transport emissions, rather than aiming to vastly exceed current renewables targets, and with much less adverse environmental and social effects. The government’s sustainable

development commitment would require that least damaging actions should be prioritised over other actions, if the essential aim can be achieved.

Tourism

The Trust believes that this application would impact on the tourism industry in the area and also affect government tourism policy targets. In particular, the Trust notes that “*account has been taken of the most recent study which provides information and data on tourists’ responses to wind farms in Scotland (Glasgow Caledonian University, 2008)*”.

The Trust believes that both that Report authors and others have been very selective in quoting from their findings. Some of the less quoted findings of that study, “*The economic impacts of wind farms on Scottish tourism*”. are given below:

- The report states that “*Scottish tourism depends heavily on the country's landscape, with 92% of visitors stating that scenery was important in their choice of Scotland as a holiday destination, the natural environment being important to 89% of visitors (Tourism Attitudes Survey 2005).*” p.2
- “*There is often strong hostility to developments at the planning stage on the grounds of the scenic impact and the perceived knock on effect on tourism. **However developments in the most sensitive locations do not appear to have been given approval so that where negative impacts on tourism might have been a real outcome there is, in practice, little evidence of a negative effect.***” p.4
- This paragraph highlights what is at stake here and now. This would be the first, industrial-scale incursion of a wind power development into Shetland
- Discussing the internet survey part of the study, the Report states that: “*A much higher percentage of respondents indicated that they would not visit an area if a wind farm was constructed (17.8%) than was found in the intercept survey. It should be noted that this result is less robust than the estimate provided by the intercept survey and should therefore be treated with caution, as, unlike the intercept study, respondents were not made aware of what constituted the “local area”. **However, the result is indicative of the level of negative feeling some people have towards wind farms.***” p.8
- “**Willingness To Pay**” “*In 6.9.2 and Table 6.7 and 6.8, on page 166, the amount extra that tourists are willing to pay to have a room with a view which does not have wind turbines in it. The average loss, per room per night, is assessed as £6.90, or 18% (Table 6.8).*”
- *At the national planning level the research..... identifies that from a tourism viewpoint:.....**The loss of value when moving from medium to large developments is not as great as the initial loss. It is the basic intrusion into the landscape that generates the loss.***
- “*Finally this research found that, in general, the public did not recognise that*

*some areas had been protected from development. **Currently those tourists who do find wind turbines an objectionable presence are most likely simply to move to another area in Scotland. To ensure substitution opportunities it is important that areas are retained where turbine development is limited to supplying local needs in small remote communities, and indeed the wilderness nature of these areas publicised.***" P.16

The local Economy

There is a lot in the ES about the opportunities economically this development would bring to the local economy. In reality, a very substantial part of the investment is coming from the local people, through the Trust money which Viking Energy Ltd. hold in trust for them. It is questionable whether it would be considered good financial practice if the Trust were to suggest investing in such a development elsewhere. There are major uncertainties in such projects as is currently demonstrated by many large-scale wind developments which have been given planning permission, such as Griffin windfarm in Perthshire, not proceeding. Moreover, there are very limited opportunities for permanent, local jobs in such schemes. There is an alternative vision which could bring job opportunities and a more sustainable lifestyle to Shetlanders – one of investment in energy conservation and decentralised energy production and use.

The John Muir Trust urges the Scottish Executive to refuse this application.

Yours sincerely

Helen McDade, Head of Policy

The John Muir Trust is the UK's leading wild land conservation organisation.

John Muir Trust: Charitable Company Registered in Scotland

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