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Ms Carlyne Paton
Senior Case Officer
Energy Consents Unit
The Scottish Government
Energy Consents Unit planning reference: ECU00004552
Sent by email: Carolyne.Paton@gov.scot

19 July 2023

Dear Ms Paton,

Objection: Repowering and Extension of Ben Aketil Wind Farm

It is with regret that we note our objection to the application submitted by Renantis UK Limited seeking approval and deemed planning permission to repower and extend the existing Ben Aketil Wind Farm (Energy Consents Unit reference ECU00004552) (the 'Proposed Development').

We are a charity dedicated to the conservation, protection and restoration of the UK's wild places. We support the Scottish Government's net zero emissions target and the principle of repowering onshore wind farms as a means of achieving our net-zero targets without the further destruction of wild places. We are objecting to the Proposed Development principally because of its adverse impact on nationally important peatland.

1. It is estimated that 117,582m³ of peat would need to be excavated for the Proposed Development¹; this is almost three times more than other larger onshore wind farms proposed on peatland².
2. The Non-Technical Summary relies on the reuse of the excavated peat to conclude that '*no significant impacts on... peat would arise as a result of the Proposed Development*'³. However, the suggestion that peat can be reused without any impact is contrary to the IUCN's recent briefing on Peatlands and Development: '*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*

¹ Chapter 9: Appendix 9.2 - Outline Peat Management Plan

² Quantans Hill Wind Farm (ECU ref. ECU00003399) with 21 turbines is estimated to require 38,936m³ of peat excavation (Appendix 8.3: Peat Management Plan) and Loch Liath Wind Farm (ECU ref. ECU00002182) with 13 turbines is estimated to require 38,512m³ of peat excavation (Appendix 7.3: Outline Peat Management Plan)

³ Non-Technical Summary

*maintain saturation without further consideration to its hydrology and this therefore runs the risk of carbon loss through oxidation and erosion.'*⁴

3. The Proposed Development does not comply with the mitigation hierarchy outlined in Policy 5(a) of the National Planning Framework 4 ('NPF4'). Policy 5(a)(i) states that development proposals will only be supported if they are designed and constructed '*[i]n accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land*'. No meaningful attempt to mitigate the impact of the development through siting or design is apparent in the Proposed Development. All the turbines and new access tracks are sited on undeveloped Class 1 peatland with the exception of a very short section of track passing through Mineral Soil⁵. The new Southern access track (which is estimated to require 16,111m³ of peat excavation⁶) is proposed through Class 1 peatland with no justification in the Design and Access Statement for why this is needed in addition to the existing Northern access track.
4. The Outline Habitat Management Plan indicates that habitat improvement measures (such as ditch-blocking) will be considered. However, without specific commitments we do not believe this is sufficient to meet the biodiversity enhancement requirements in Policy 3 of NPF4.

The Scottish Government's Onshore Wind Policy Statement explains that repowering should prompt consideration of '*the ongoing suitability of the site for further wind farm development*'⁷. Due to the significant impact to high quality peatland, we do not believe the site of the Proposed Development is suitable for further development. We therefore object to the Proposed Development.

Yours sincerely,

The John Muir Trust

⁴ <https://www.iucn-uk-peatlandprogramme.org/resources/briefings>

⁵ Chapter 9: Figure 9.2: Soils, peat and carbon mapping

⁶ Chapter 9: Appendix 9.2 - Outline Peat Management Plan

⁷ <https://www.gov.scot/publications/onshore-wind-policy-statement-2022/>