

Email to:
Joe Perry, Climate Change Coordinator, Highland Council
joe.perry@highland.gov.uk
Steven Andrews, Project Coordinator, Flow Country WHS
steven.andrews@highland.gov.uk

26 July 2022

Dear Mr Perry, and Mr Andrews,

Response to: The Flow Country Partnership consultation on the proposed Flow Country World Heritage Site and boundary – May 09, 2022

Scottish Renewables is the voice of Scotland's renewable energy industry. Our vision is for Scotland to lead the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. We represent over 300 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable energy technologies, in Scotland, the UK, Europe and around the world, ranging from energy suppliers, operators and manufacturers to small developers, installers, and community groups, as well as companies throughout the supply chain. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can provide solutions to help sustainably heat and power Scotland's homes and businesses.

Scottish Renewables (SR) welcomes the opportunity to provide our view, supported by case studies, to The Flow Country Partnership's consultation on the proposed Flow Country World Heritage Site (WHS) and boundary.

The renewable energy sector recognises the dual challenges of the nature and climate crises, and the need for urgent, strategic-scale action and proportionate statutory protection to address them. Renewable energy developments can deliver for nature, including via peatland restoration, and therefore have the potential to tackle both the nature and climate crises in tandem. The sector welcomes proportionate and robust statutory protections and acknowledges the potential benefits that WHS status could bring to the Northern Highlands, such as tourism.

In responding to this consultation, we would like to draw your attention to the following key points:

- The Flow Country is located in or bordering an area of Scotland that will remain strategically important for renewable energy developments for the foreseeable future. Northern Highlands will have a crucial role to play in pursuit of Scotland's legally binding target of reaching net-zero by 2045 and the binding interim targets for 2030 and 2040.
- To maximise the overall progress towards net-zero it is critical that designation as a WHS avoids introducing any new and not objectively justified barriers that would materially impede the deployment of renewable energy developments within or in the vicinity of the proposed WHS.

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- By introducing additional planning barriers to the deployment of Scotland’s most affordable renewables technology (onshore wind), the proposed WHS and boundary would directly conflict with the overarching ambitions and directives of Scottish Planning Policy as stated in the forthcoming National Planning Framework 4 (NPF4).
- Concrete evidence demonstrates that onshore windfarms provide substantial benefits to biodiversity through enhancement works, secured within consents. Therefore, they can co-exist within and in proximity to the proposed WHS and boundary. Well-planned onshore wind development positively contributes to both the twin key challenges of draft NPF4: the Climate Emergency and the Nature Crisis. We recommend that The Flow Country Partnership should therefore be supportive of appropriately sited renewable energy developments.
- Our members highlight that designation as a WHS by UNESCO brings no additional statutory controls, but protection is afforded through the planning system and the site-specific management plan. The majority of the proposed Flow Country Site and boundary is located within existing overlapping statutory designated sites, including SSSIs, SPAs, SACs and Ramsar sites. These designations provide an appropriate level of statutory protection for the blanket bog. Therefore, WHS designation is in environmental protection terms more of an accolade than a necessary layer of protection. It may though bring economic benefits to the Highlands through tourism, and this is welcome.
- Our members highlight that WHS status for this bid is not founded on landscape quality and WHS status should not be considered a landscape designation – that goes beyond the nature of the bid itself and the rationale for its inclusion as a WHS. If designation is conferred and policy is introduced at a National or Local level which seeks landscape protection of the peatbog, then that policy has gone too far, beyond the reasons for designation and not something our members can support. In the final stages of conferring WHS status on the Flow Country, it must be clearly recognised that landscape value is not one of the reasons for that status.
- SR members highlight that existing environmental designations are sufficient for the protection of the blanket bog system and argue any tightening of development restrictions is not necessary and will only reduce Scotland’s ability to meet the legally required net-zero targets. It is our recommendation that the World Heritage Site and boundary be contained in areas already designated.
- We, therefore, oppose the expansion of the boundary from the 2019 ‘Technical Evaluation’ document. The updated boundary, shown in the 2022 consultation package, represents a significantly expanded area covering currently undesignated land. SR members strongly recommend that these additional areas should not be included without substantial and transparent justification. Crucially, the protections afforded to the eventual WHS boundary must be proportionate and should reflect the comments provided herein in relation to environmental and landscape protection.
- There is a strong focus on the fact that *“people have shaped The Flow Country for thousands of years and the peatlands provide important ecosystem services for local communities”*. However, this only appears to consider more romanticised influences such as farming, angling, peat cutting and alike, excluding modern industries, such as onshore wind, from the recent past which now help shape The Flow Country and its surrounding area for future generations to come.

It is trusted that the concerns and matters raised in our response will be taken into account when considering the proposed WHS site and boundary, as well as in due course in relation to the management strategy.

Scottish Renewables would be keen to engage further with this agenda and would be happy to discuss our response in more detail.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Richardson', with a long horizontal flourish extending to the right.

Mark Richardson
Senior Policy Manager | Onshore Wind & Consenting
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Scottish Renewables

RESPONSE TO CONSULTATION

Response to the Order of the Consultation

It is understood that the current consultation relates to the proposed World Heritage Site (WHS) and boundary. The Flow Country proposals' website contains an interactive consultation on the boundary and states *"the proposed site boundary is a key element of the Flow Country World Heritage project. Here you can leave comments on any sections you have concerns over, or areas you would like to see included"*.

However, the related management plan for the proposed WHS area is not yet being consulted upon. The sequence of considering the appropriateness or otherwise of the boundary first, and then going on to examine the content of a management approach/plan (which will presumably deal with various land use matters) is the wrong sequence of consideration. Our members agree it would be more logical to consider the land use activities which are present, and which are expected to continue within the area, then to address a boundary that would be appropriate recognising that land use distribution and activity.

The Purpose and Scope of the WHS

In responding to this consultation, it is essential that the purpose of a World Heritage Site is reflected in any proposals.

UNESCO defines World Heritage as:

"Heritage is our legacy from the past, what we live with today, and what we pass on to future generations. Our cultural and natural heritage are both irreplaceable sources of life and inspiration".¹

With regards to The Flow Country, NatureScot highlights the following:

"The Flow Country of Caithness and Sutherland owes its unique character to the accumulation of the largest expanse of blanket bogs in Europe that give the area its wild and apparently timeless solitude. In fact, the scenery is far from pristine, as much of the moorland was once wooded, as shown by the fossilised stumps of pine trees that are common in the peat. Much of this ancient forest cover was reduced by the activities of Mesolithic man who cleared the forests for agriculture and fuel. These clearances, together with a cooler and damper climate 6,000 years ago, led to the widespread development of the peat mosses".

NatureScot further highlights:

"In the more rural areas, traditional whisky distilleries are still a prominent feature of the landscape. The industry is dependent on the pure water that percolates from the rocks and flows into the clear Highland burns. Newer industrial developments, such as wind farms, are now springing up. These take advantage of the windy climate to produce more energy than was gained by burning the peat from the moors on which many of the turbines are constructed. The influence of nearby offshore energy production from North Sea oil and gas is also evident, from the former rig building yards at Ardersier and Nigg to the presence of oil rigs moored in the Cromarty Firth. All of these facets of modern and ancient development have produced the fascinating tapestry of cultural and natural landscapes of Caithness and Moray that are as varied as the rocks on which they are built".²

¹ UNESCO World Heritage website, <https://whc.unesco.org/pg.cfm?cid=160>

² Clive Auton, Jon Merritt, Kathryn Goodenough, Moray and Caithness – A Landscape Fashioned by Geology, <https://www.nature.scot/sites/default/files/2017-06/Publication%202011%20-%20Landscape%20Fashioned%20by%20Geology%20-%20Moray%20and%20Caithness.pdf>

In contrast, the Partnership website says little about the modern human heritage of The Flow Country and emphasises humans living alongside the peatbog rather than being integral to the shaping of the landscape:

“The Flow Country is a vast expanse of blanket bog in the North of Scotland. Blanket bog is a rare type of peatland which forms only in cool places with plenty of rain and covers the landscape like a blanket.

Peatlands are for people as well as wildlife. It’s hard to grow crops on the wet bog itself, but in the wide, shallow valleys that cut through it – called straths in Scotland – people have lived and farmed for thousands of years.

Today, The Flow Country is being managed to encourage community and economic development, as well as benefit the peatland environment. You’ll find thriving communities along the straths and around the edges of the rolling moorland, and fascinating stories of how people live and work alongside the peatbog”.³

SR members question why the current consultation is almost silent on the cultural land uses set out by NatureScot, including the renewable energy sector, and what this cultural heritage contributes to (and can further contribute) in terms of national interest in this part of the Highlands.

Further, SR members highlight the previous consultation was not silent with regard to onshore wind development. The information boards that were used in the 2019 public consultation exercise stated:

“World Heritage Site is not a ‘no go’ for wind farm development. However the developer will be expected to demonstrate that any significant effects on the qualities (i.e. the outstanding universal value) of the World Heritage Site can be substantially overcome by siting, design or other mitigation. World Heritage Site designation would be part of the mix of issues / designations that would be considered when determining an application”.

SR members highlight that the creation of the WHS appears to be founded on the principle of promoting eco-tourism and will appeal to certain tourist demographic. Caithness and Sutherland already face tourism infrastructure provision challenges due to the considerable success of the North Coast 500 tourist route which has resulted in the increased demand for accommodation providers and hostels, however, it appears to yield few benefits for those in the farming and traditional land management sector.

Response to Proposed Flow Country World Heritage Site and Boundary

Caithness and Sutherland are part of the Highland region which is of strategic importance for renewable energy development. The activity of the sector in this area is comprised of operational wind farms, consented not yet constructed and Section 36 Electricity Act applications that are already in the planning system, as well as others, due to be submitted in due course (e.g., at Scoping and Feasibility stage).

SR members are concerned that, in the absence of proportionate and robust policies, the proposed WHS and boundary will impose a further barrier to onshore wind deployment and renewable energy development in Caithness and Sutherland. This could limit land management practices, future economic growth, and job creation that support a Just Transition, making it harder for Scotland to address the climate emergency and meet its legally binding net-zero targets.

³ The Flow Country website, <https://www.theflowcountry.org.uk/>

The blanket bog is already extensively protected by a matrix of Sites of Special Scientific Interest (SSSI), European Special Areas of Conservation (SACs), Special Protection Areas (SPAs), National Nature Reserves (NNRs) and wider Ramsar designations across the Flow Country, alongside landscape designations of National Scenic Areas (NSAs) and Wild Land Areas (WLAs).

Our members highlight the existing designations are sufficient for the protection of the blanket bog system and argue any tightening of development restrictions will only reduce Scotland's ability to meet our ambitious net-zero targets.

Our members particularly oppose the expansion of the boundary from the 2019 'Technical Evaluation' document. The updated boundary, shown in the 2022 consultation package, represents a significantly expanded area covering currently undesignated land and undermines the robustness of this proposal. If the aim is to create a landscape-scale boundary, we argue it would be beneficial to include all areas of blanket bog (regardless of forestry or wind energy) or stick with the most highly valued areas of blanket bog (as indicated by existing designations). What is being proposed is neither one nor the other.

SR members strongly recommend that these additional areas should not be included without substantial and transparent justification. Crucially, the protections afforded to the eventual WHS boundary must be proportionate and should reflect the comments provided herein in relation to environmental and landscape protection. Further, there should be no 'buffer zones'.

The Technical Evaluation, 2019, p.25 (g) stated the following in relation to the proposed boundary:

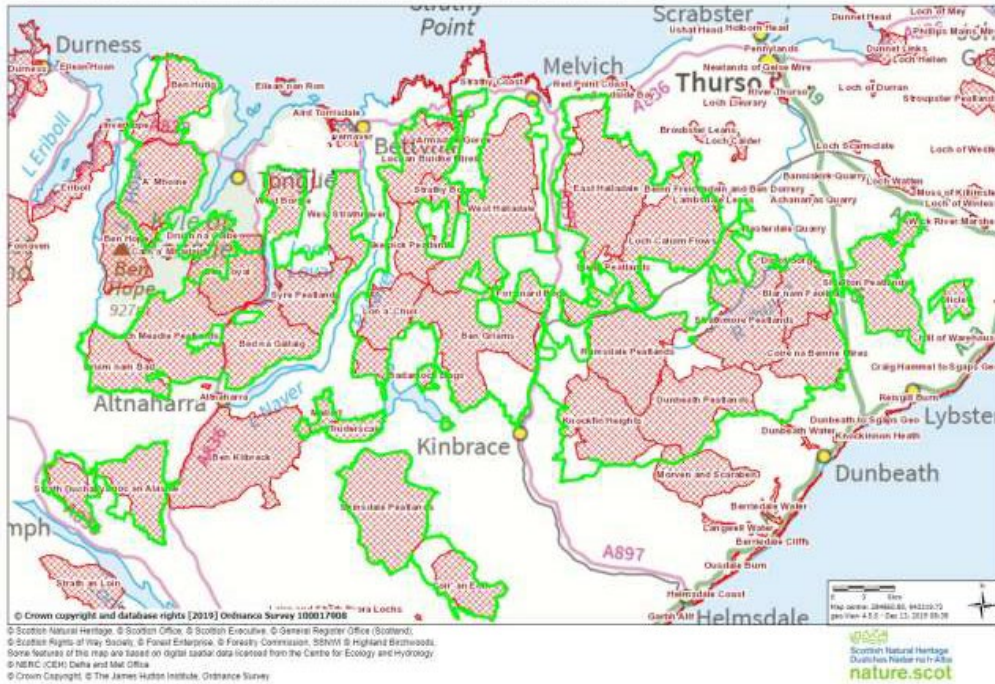
Wind farms and other major developments: *It can be expected that the proposed Site will continue to be an area around which there may be some major developments. This could include a range of types and scales, such as wind turbines, energy infrastructure and even a potential satellite launching station. Planning policy will not and should not prevent proposals from being brought forward and they would be considered on their merits. However, policy for WHSs will be able to give a clear steer as to how proposals that would have the potential to affect a WHS, or its setting, will be subject to robust assessment and the OUV protected and preserved; particularly as there is an expectation in national policy that the site of a wind farm needs to be suitable for such use in perpetuity*

For wind farms, Scottish Planning Policy (SPP) (2014) sets out that World Heritage Sites are:

'...areas of significant protection, where wind farms may be appropriate in some circumstances'. Further consideration will then be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation'. There are no wind farms within any of the proposed Site's designated areas. In the wider peatland area several wind farms are already installed, and others are planned. They are therefore acknowledged as a pre-existing type of feature of the wider setting of The Flow Country.

The Technical Evaluation, 2019, p.20 continues with *Figure 4 – Proposed boundary (green line) with existing designated sites (red hatching):*

Figure 4. Proposed Flow Country WHS Boundary and Existing Designated Sites



This differs to the proposed WHS and boundary in the current Flow Country Partnership consultation, 2022, SR members have created the geo-referenced map below to highlight this divergence overlain with:

- Currently proposed 2022 World Heritage Site – Pink
- SSSI, SPA, SAC – Black
- National Nature Reserve – Grey
- National Scenic Area – Transparent Grey
- Wild Land Areas – Diagonal hatching in light brown



Our members robustly disagree with the significant increase in the proposed WHS and boundary since the Technical Evaluation, 2019, and strongly recommend the 2022 proposed area is reviewed. As stated above, **we strongly recommend that these additional areas should not be included without substantial and transparent justification. Therefore, it is our recommendation that the WHS and boundary be contained in areas already designated.**

Scottish Planning Policy

We welcome The Scottish Government's commitment in the forthcoming National Planning Framework 4 (NPF4) that *"To achieve a net zero, nature-positive Scotland, we must rebalance our planning system so that climate change and nature recovery are the primary guiding principles for all our plans and all our decisions."* Further, NPF4 clearly states regarding the 2045 net-zero target that *"it is likely that the onshore wind sector will play the greatest role in the coming years"* (pg. 90). By introducing additional planning barriers to the deployment of Scotland's most affordable renewables technology (onshore wind), the proposed WHS and boundary would directly conflict with the overarching ambitions and directives of the Scottish Planning Policy.

The extent of the WHS and boundary as currently proposed would not only impact upon onshore wind developments that are currently in the planning system or consented but would unduly restrict the potential for repowering of wind energy development. Repowering of existing operational sites will involve larger footprints of development given the larger scale and wider spacing requirements of efficient modern turbines.

It is imperative that the WHS (should it be successful) would not impose restrictions on such repowering proposals within the Caithness and Sutherland area. Combined the net-zero targets and an additional 12GW by 2030 of onshore wind (expected to be confirmed in the updated Onshore Wind Policy Statement 2022) are acutely challenging. Significant contributions will be required of already installed capacity being repowered.

Although NPF4 is currently in draft form, it is expected to be submitted in its final draft form to the Scottish Parliament this Autumn⁴ and will come into force before the end of 2022. It is imperative therefore that the approach to the WHS and boundary, as well as the subsequent land use management policy, consider the NPF4 policy approach. The proposed WHS and boundary consultation material is entirely silent on the current changing national planning policy position.

Tourism

As stated above, the creation of the WHS appears to be founded on the principle of promoting eco-tourism and will appeal to certain tourist demographic.

The report *Onshore Wind and Tourism in Scotland*⁵ published by BiGGAR Economics in November 2021 contains an analysis of 44 wind farm case studies in Scotland and finds no evidence of a link between wind farm development and trends in tourism employment. The researchers noted that the total number of turbines across Scotland increased from 1,082 in 2009 to 3,772 in 2019, during which period employment in tourism-related sectors in Scotland also grew by 20%.

Specific wind farms have also become tourist attractions, providing access to green spaces and nature for walking, cycling and education, as has been demonstrated at Whitelee⁶ and is being explored in the Hagshaw Hill cluster project. Further, the development of larger clusters of wind

⁴ The Scottish Government, [Chief Planner's Letter](#), 01 July 2022.

⁵ BiGGAR Economics, 2021, <https://biggareconomics.co.uk/onshore-wind-and-tourism-in-scotland>

⁶ 10 Years of Whitelee Windfarm, 2019, https://bvgassociates.com/wp-content/uploads/2019/06/BVGA_SPR-Whitelee_10_year_anniversary-r1.pdf

farms supports a more holistic approach to land use and nature recovery as is demonstrated by Hagshaw Hill. It will also enable the development of 'carbon parks' where renewable energy generation, carbon sequestration and access to nature are combined in ways that create quality, green jobs and support a Just Transition.

We robustly argue that onshore wind can be a positive contributor to a WHS. Scotland has established a global reputation as a leader in climate change action and renewable energy. Our net-zero landscape will include more and taller turbines in addition to restored peatland, forested hills, and active wetlands. All of this should be viewed as a positive sign of a progressive nation proactively addressing the climate and biodiversity emergencies in an integrated way and our national initiatives to promote Scotland as a desirable tourist destination should reflect this.

Conclusions and Recommendations

In summary, given the extent of existing environmental designations across the Flow Country and the absence of proportionate protection policies that avoid introducing additional barriers the creation of a WHS would only serve to unnecessarily restrict opportunities for anyone with a practical or productive interest in the land. We question what are the benefits to the wider area and community? And if looking at land management, what are the benefits beyond promoting tourism?

World Heritage in the Flow Country is much more than the already highly protected blanket bog. If the proposed Flow Country World Heritage Site and boundary become an addition to creeping designations across Scotland that purely serves to alter the balance between 'natural' and 'human influenced' then it will do us all a disservice. **SR members strongly recommend that the draft rationale must be revised, and the proposed World Heritage Site and boundary must concisely include all the elements, human and natural, which make up this unique area of Scotland.**

In conclusion, our key recommendations are:

- The boundary of a WHS should be restricted to existing designations namely the SACs, SPAs, SSSIs and additional land beyond those designations should not be included. There should be no 'buffer zones'.
- The sequence of considering the appropriateness or otherwise of the boundary first, and then going on to examine the content of a management approach/plan is the wrong sequence of consideration and should be revised.
- There should be explicit recognition of land-use activities which are present, and which are expected to continue, and then to address a boundary that would be appropriate recognising that land use distribution and activity.
- It must be acknowledged that Onshore wind development is a key land use sector in Caithness and Sutherland and will have a crucial role to play in pursuit of Scotland's legally binding target of reaching net-zero by 2045 and the binding interim targets for 2030 and 2040 – as set out in draft NPF4 and in the Onshore Wind Policy Statement Refresh 2021.
- It must be explicitly recognised that appropriately sited wind farm development on the edges of the designated areas (primarily the Natura network) provides an opportunity (and significant funding at a time of considerable public sector funding constraints) to implement habitat management and peat restoration by working with landowners to reverse, mitigate and manage the effects of detrimental land management activities.

Examples: Benefits achieved by the renewables industry through enhancement works

Case Study 1: Coriolis Energy – Improvements to Peatland, Causeymire Windfarm⁷

Key research has been conducted between 2004–2019 by Dr Tom Dargie of Boreas Ecology at the operational Causeymire Wind Farm. Causeymire Wind Farm is not within the proposed site boundary for the proposed World Heritage site and boundary which further strengthens the argument that there is prejudgement when mapping these boundaries that onshore wind farms are not congruous with the WHS when scientific evidence contradicts this view.

The Executive Summary notes substantial improvements to the peatland environment over the 15-year monitoring period including:

- The Sphagnum cover on bog habitat at Causeymire Windfarm is now likely higher than that cover on many other parts of the Flow Country. It has developed the following site enhancements measures and is the outstanding result of good site management.
- It is possible that the Sphagnum increase is related to windfarm microclimate change downwind from turbines, but this is not yet conclusive. Early monitoring in 2004, 2005, 2006, 2007 and 2009 show that Sphagnum increase began immediately following windfarm construction, continuing at a near-exponential rate within bog habitat.
- Using the 2019 monitoring area of 946 hectares and average per cent Sphagnum cover, the extent has significantly increased from an initial 2004 baseline figure of 11% (115 ha), rising to 48% (452 ha) in 2019. The 337 ha of recent Sphagnum establishment is concentrated in a drained and undrained blanket bog which now has covers of 55% and 74% respectively.
- The RSPB monitoring method shows large improvements in the extent of several indicators of good bog condition and breeding bird habitat, particularly increased cover for Heather and Bog-moss Sphagnum. There is considerable overlap in the locations of the increases, suggesting they have occurred together over much of the bog within, around and distant from the windfarm. The increase in Sphagnum is particularly large on both drained and undrained blanket bogs.
- As a measure of improved condition, monitoring for the same area as Macaulay's work shows the following sequence over time: 14.7% (2004) → 29.4% (2009) → 35.8% (2014) → 32.5% (2019). A high Sphagnum cover suggests much more active bog and fen habitats (i.e. increased rates of peat formation).

Case Study 2: Scottish Power Renewables – Biodiversity Initiatives

- Scottish Power Renewables (SPR) has delivered a wide range of biodiversity initiatives at its sites, including the restoration of degraded peatland habitat, creation of native woodlands and species monitoring. SPR currently manages approximately 8,500 hectares of peatland habitat and has spent £2.5 million on peatland restoration and research over the last decade, including investigating the impact of constructing infrastructure on peatland habitats, thus demonstrating the positive impacts of renewable energy developments for peatlands.

END

⁷ Dr Tom Dargie, Concluding Report – Habitat Enhancement and Monitoring (2004 – 2019), Causeymire Wind Farm, Caithness, <https://www.ventientenergy.com/wp-content/themes/ventient/docs/BoreasCauseymireHabitatMonitoring2019.pdf>