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The Flow Country Partnership

The Links,

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24 July 2026

To Sarah,

Response to the Draft Flow Country Sustainable Tourism Strategy 2026–2036

Scottish Renewables (SR) 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 375 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable 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.

SR welcomes the opportunity to comment on the draft Sustainable Tourism Strategy prepared by Blue Sail on behalf of the Flow Country Partnership. We agree with the fundamental proposition of the Strategy: that tourism can interact with, and benefit from, the WHS designation, in a way that it currently does with onshore wind, which delivers meaningful benefit to communities in Caithness and Sutherland.

This response should be read together with our letter of 25 June 2026 on the Post-Inscription Management Plan update and its accompanying SEA. The concerns we raised there

particularly regarding the introduction of "experiential" and "functional" setting concepts, the treatment of lighting, and the failure to weigh the opportunity cost of foregoing renewable energy generation in areas now being designed (approximately a further 27% beyond European and Designated sites) against the WHS's stated climate ambitions remain relevant to the way in which this Strategy is finalised and implemented.

1. Recognising the Full Range of Land Uses in and Around the Flow Country

The Strategy is well constructed as a document about tourism, but it presents the Flow Country largely as if tourism, conservation and community activity were the only significant land uses in and around the designation. In reality, the wider Caithness and Sutherland landscape is host to a diverse and mutually reinforcing mix of activities including crofting, farming, forestry, fisheries, aquaculture, defence, and, importantly, onshore wind and other renewable energy generation, grid and balancing infrastructure that is essential for a prosperous Scotland. Each of these makes a substantial contribution to the prosperity of the north Highlands and, in turn, to the very visitor economy the Strategy seeks to support.

The Strategy itself acknowledges "more recent stories of energy generation, farming diversification and community celebration" as part of the cultural narrative of the area. This is welcome, and we would encourage the Partnership to build on this acknowledgement rather than treat energy as invisible or incidental. The tourism sector, energy sector and rural communities in Caithness and Sutherland are already interdependent: renewables provide year-round, high-value employment; underpin the retention of working-age population in rural settlements; fund significant community benefit programmes; and generate the infrastructure (roads, digital connectivity and upgraded harbours) on which the visitor economy requires to be successful. Notably, the Strategy already identifies renewables-related community benefit funding including network's Community Benefit Fund and wind farm Renewables Sustainable Development Funds as key funding streams for its own delivery.

SR's core ask is therefore that the final Strategy explicitly recognises the co-existence of these land uses and does not, whether by omission or by inference, position onshore wind and other energy development as incompatible with the future of tourism in the Flow Country. This is a question of both accuracy and consistency: it would be untenable for the Partnership to depend on renewables community benefit funding to deliver its tourism programme while simultaneously casting renewables development as antithetical to the destination's character.

2. Tourism and Onshore Wind Co-exist

There is now a substantial and consistent body of Scottish evidence showing that onshore wind and tourism co-exist successfully in Scotland. The Strategy would be strengthened by explicit reference to that evidence, both to give members and communities confidence in the Partnership's approach and to guard against the emergence of a false trade-off between energy and tourism in the years ahead.

Key findings include:

- BiGGAR Economics (2021), Wind Farms & Tourism Trends in Scotland: Evidence from 44 Wind Farms. Between 2009 and 2019 the number of onshore wind turbines in Scotland grew from 1,082 to 3,772 and installed capacity rose from 1.8 GW to 8.0 GW. Over the same period, employment in tourism-related sectors in Scotland grew by 20%, with the strong growth in predominantly rural local authority areas including Highland. The study found no meaningful relationship between the rate of wind farm deployment and tourism employment at local authority level, and in the majority of the 44 case studies, tourism employment in the surrounding study area defined using data zones within 15 km of the wind farm outperformed the wider local authority. For example, Stronelaig Wind Farm in Highland saw tourism employment grow by 43% locally between 2015 and 2019, compared with 21% across Highland as a whole.
- The Moffat Centre, Glasgow Caledonian University (2008) concluded that overall, there is no evidence to suggest a serious negative impact of wind farms on tourism and noted that hostility to wind farms tends to lessen over time as they become an accepted, and in some cases valued, feature of the landscape.
- The ClimateXChange (2012) Scottish visitor surveys have generally found that, for a large majority of respondents, the presence of wind farms would not affect their decision about where to visit or stay.
- The Scottish Government's National Planning Framework 4 (NPF4) energy policy places renewables at the heart of a prospering Scotland by signalling renewables is a nationally important policy priority.
- Wind farms as tourism assets in their own right acting as a connector to wider routes that have been opened up and also as destinations where tourists actively visit.

Taken together, this evidence base rebuts the assumption that visibility of onshore wind development undermines the market segments the Strategy seeks to attract. Indeed, the "Natural Advocates", "Curious Travellers" and "International Explorers" identified in the

Strategy are precisely the audiences most receptive to sustainability, climate and stewardship narratives in which Scotland's leadership on renewables is a differentiator, not a detractor.

3. Peatland Restoration Delivered Through Wind Farm Developments

A critical omission in the current draft is any recognition of the very significant contribution that onshore wind developers are already making to the restoration of Scotland's degraded peatlands including in the Highlands and, in some cases, directly adjacent to the Flow Country WHS itself. Given that peat is central to the OUV of the WHS and to the marketing narrative of the Strategy, this contribution deserves explicit acknowledgement.

Wider examples include:

- Dunmaglass and Farr (SSE Renewables / Greencoat UK Wind). Both sites, south of Inverness, have delivered large-scale reprofiling, drain blocking and peat dam works, and have been used as case studies in Scottish Renewables' own *Wind Power and Peatland* publication which documents how the onshore wind industry is enhancing this internationally important habitat.
- Strathly South (SSE Renewables). The project has supported off-site restoration of degraded peatland within the Lochan Buidhe Mires SSSI and the Caithness and Sutherland Peatlands SAC and SPA habitats designated for the rare and protected species they support. The restoration area was assessed using the IUCN Peatland Code Field Protocol and associated guidance to quantify the potential reduction in carbon emissions arising over a 50-year period following restoration management.
- Whitelee (ScottishPower Renewables). SPR has completed 15 years of peatland restoration works at Whitelee, restoring 1,113 hectares of peat bog (an area the size of Falkirk) with the potential to store the equivalent of 3.6 million tonnes of CO₂. Total investment in peatland restoration by SPR now exceeds £4 million, with a further £1.2m spent on more than 17 years of research into restoration techniques. RSPB Scotland nominated and recognised SPR at the 2016 Nature of Scotland Awards for industry-leading peatland restoration innovation.

At a sector level, SR's own publication *Wind Power and Peatland: Enhancing Unique Habitats* sets out how onshore wind developers are working systematically to restore damaged peatland across Scotland, which is a body of work that is directly relevant to the WHS's own long-term ambitions for peatland recovery. One of SR's members was invited by the IUCN in 2017 to act as lead author on a peatland technical report and, between 2010 and

2019, had implemented 1,500 hectares of peatland restoration from commercial forestry across its projects techniques since adopted by Forestry and Land Scotland, RSPB and NatureScot.

The Strategy highlights "restoration and recovery" as a story to be told to visitors. SR believe that story is more compelling, and more accurate, if it acknowledges that wind farm developers have been and continue to be among the most significant investors in peatland restoration in Scotland.

4. Wider Points on Co-Existence and Positioning

SR would also encourage the Partnership to reflect the following in the final Strategy:

- **Onshore Wind Sector Deal.** The Scottish Government and industry are jointly committed to reaching 20 GW of onshore wind by 2030 through the Onshore Wind Sector Deal. Delivering that ambition will require continued deployment in the north Highlands, including in and around Caithness and Sutherland.
- **Community benefit and shared prosperity.** As the Strategy itself recognises, renewables community benefit funds are a primary source of investment for rural tourism infrastructure in Caithness and Sutherland. Any framing that discourages further renewables investment in the region will, over time, erode the very funding base on which this Strategy relies.
- **Gateway settlements can accommodate energy activity.** The Strategy correctly identifies Thurso, Lairg and Helmsdale as "Gateways" whose role is to "absorb" people and vehicles. These settlements are equally well placed to host renewables supply chain activity, construction workforce accommodation and long-term operational employment reinforcing, not undermining, their tourism function.
- **Cultural heritage of energy generation.** The Strategy's acknowledgement that "more recent stories of energy generation" form part of the area's cultural heritage should be developed, not diluted. From the crofting era through Dounreay to the modern onshore wind industry, energy is a defining thread of Caithness and Sutherland's story and offers strong interpretive content for visitors.
- **Marketing narratives should embrace, not exclude, renewables.** Scotland's global leadership on renewable energy is itself an attractor for the "Purposeful Contributor" and "Natural Advocate" segments the Strategy prioritises. Study tours, research visits and educational programmes centred on peatland restoration delivered through wind

farm developments would be entirely consistent with the Strategy's "Global Significance", "Slow Travel" and "Exploration & Learning" themes.

5. Recommendations

To ensure that the Sustainable Tourism Strategy supports rather than constrains Scotland's parallel obligations on climate, energy security and rural prosperity, SR asks the Partnership to:

1. Include an explicit statement in the final Strategy that the Flow Country WHS designation is not intended to act as a barrier to onshore wind, grid or other renewable energy development in or around the Site, and that tourism and renewables are recognised as compatible and mutually supportive land uses.
2. Reference the established evidence base on tourism and wind co-existence (BiGGAR Economics 2016, 2017, 2021; Moffat Centre 2008; ClimateXChange 2012) in the sections on Challenges & Opportunities, Market Trends and Experience Development.
3. National Planning Framework 4 (NPF4) should be expressly recognised within the strategy as part of the policy context against which development in the area will be considered. NPF4 forms part of the statutory development plan and must be read as a whole, and it identifies both sustainable tourism (Policy 30) and renewable energy (Policy 11) as nationally important policy priorities. As such the strategy should acknowledge that these interests are complementary rather than competing, and that both carry substantial weight in the planning balance.
4. Acknowledge, within the Strategy's narrative on peatland restoration and climate change mitigation, the very substantial contribution already being made by onshore wind developers to peatland restoration across Scotland, including in the vicinity of the WHS.
5. Ensure that the proposed Tourism Group, and any successor governance bodies, include renewables industry representation given the sector's material role in the region's economy and its funding of tourism initiatives.
6. Confirm that neither this Strategy nor the parallel Management Plan will be used to introduce landscape, setting-based or "experiential" planning tests beyond the WHS boundary, consistent with the concerns set out in our 25 June 2026 letter.

SR would welcome the opportunity to meet with the Partnership to discuss these points and to share further evidence and case studies from our members. We remain committed to ensuring that the Flow Country's status as a globally significant peatland is celebrated and that its inscription supports, rather than impedes, the sustainable growth of tourism, renewable energy and rural communities across Caithness and Sutherland.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'W. Black', with a horizontal line drawn underneath the name.

Will Black
Interim Head of Onshore Policy
Scottish Renewables