

RSPB Scotland Briefing – February 2005

Summary of RSPB Objection to Lewis Wind Power Application for 234 turbines on the Lewis Peatlands Special Protection Area (SPA)



The RSPB has lodged an objection to an application to build 234 wind turbines on the Lewis Peatlands SPA. This proposal will result in the loss of at least 50 golden eagles, 50 merlin and up to 150 red-throated divers due to collision with turbines during the lifetime of the development – according to the developers' own Environmental Statement. A staggering 4% of the entire GB population of dunlin and 1.5% of the golden plover population will be lost due to displacement. Whooper swan, corncrake and white-tailed eagle will also be affected by the proposal. Construction of roads and turbines could potentially affect up to 6255ha of active blanket bog – an internationally rare habitat. This development will be hugely damaging if it goes ahead - **Please act now. We need your help!**

Please read this briefing or have a look at our website and, if you share our concerns, send an objection before June 2005 to: Lesley Thomson, The Scottish Executive, Consents and Emergency Planning Unit, 2nd Floor, Meridian Court, 5 Cadogan Street, Glasgow G2 6AT
Email: lesley.thomson@scotland.qsi.gov.uk

The RSPB's position on wind power and other renewables

The RSPB views climate change as the most serious long-term threat to wildlife in the UK and globally. If we are to avert serious disruption to natural, social and economic systems, we need to act now to limit the use of fossil fuels that release greenhouse gases into the atmosphere. We therefore support the increased use of wind power, as part of a mix of renewable energy technologies, as long as wind farms are sited, designed and managed so they do not significantly harm birds and other wildlife or their habitats.

The development proposal

The proposal by Amec and British Energy (operating as Lewis Wind Power – LWP) is for a 234 turbine, 702MW wind farm on the Isle of Lewis in the Western Isles of Scotland. The turbines will be 140m high to the tip of the blade and be supported by a large concrete foundation (approximately 22mx22mx1.5m). The development also includes 167km of roads, 9 electrical substations, a control building, 9 wind monitoring masts, 210 pylons supporting 56km of overhead lines, 5 rock quarries, 8 temporary compounds and 4 concrete batching plants. This large-scale industrial complex will take roughly three years to build.

Why has the RSPB objected to this development?

Having considered the Environmental Statement (ES) in detail, we have submitted an objection because we believe this development will have an enormously damaging impact on a number of internationally important sites. In particular: the Lewis Peatlands SPA, the Ness and Barvas (Corncrake) SPA (protected under the EC Birds Directive); the Lewis Peatlands Ramsar site (protected under the Ramsar Convention on Wetlands of International Importance) and the Lewis Peatlands candidate Special Area for Conservation (cSAC) (protected under the EC Habitats Directive).

The impacts on birds

The location of this development in such an internationally important and sensitive location, protected by multiple nature conservation designations, means that the scale of potential impacts is staggering. These include – according to the developers' own figures:

- **50 golden eagles** lost due to collision with turbines and the displacement of one breeding pair during the lifetime of the development;
- **50 merlin** lost due to collision with turbines and the displacement of 5 breeding pairs during the lifetime of the development (20% of the SPA population);

- 20 red-throated divers will be lost due to collision - but due to an error in the spreadsheet calculations in the ES this figure should be between **75-150 red-throated divers killed during the lifetime of the development;**
- a minimum of **314 pairs of dunlin** will be lost to the population due to habitat loss, modification or displacement (4% of the entire GB and Ireland population and 3% of the entire temperate population of *schinzii* dunlin). We believe the true figure is **more likely to be in the region of 640 pairs;**
- a minimum of **350 pairs of golden plover** will be lost to the population due to habitat loss, modification or displacement (1.5% of the entire GB and Ireland population). We believe the true figure is more likely to be in the region of **700 pairs if a worst-case scenario is considered** (33% of the SPA population or 3% of the entire GB and Ireland population);
- the development also presents a significant collision risk for **migrating corncrakes** (an internationally threatened species) which breed in a number of areas along the coast. This risk has not been quantified by the developer;
- Lewis is also known to be on the migration route of large numbers of **whooper swans**, which are recognised to be at particular risk due their size and lack of manoeuvrability, particularly after an 800km sea-crossing from Iceland (Birdlife Iceland has submitted an objection to the proposal due to these concerns); and
- **Greenland barnacle goose, Greenland white-fronted goose and white-tailed eagles** (sea-eagles) are amongst the other species which are known to use or migrate over this area and for which there is no evaluation of risk.

The impacts on habitats

Much of this proposal is located on peatland habitat, supported by complex hydrological systems which are highly sensitive to alteration. The survey work undertaken for the ES is extensive but, we believe, fundamentally flawed. We have taken expert advice which states that the proposed area which could be affected by the development goes significantly beyond the 50m zone around the turbines and roads identified in the ES, and instead extends up to 250m. Taking into account this buffer, the area of active blanket bog potentially affected is 6255ha, including several hundred hectares within the Lewis Peatlands cSAC (the area of habitat protected under the EC Habitats Directive). Any alteration to the habitat will obviously have an impact on the species it supports.

Are there any mitigation proposals?

The ES has attempted to define 'Primary Bird Areas' in order to ensure a layout which avoids those areas of 'greatest sensitivity'. However, this is impossible for golden plover or dunlin because they occur at such high densities across the entire site. Almost a quarter - 23% - of the proposed turbines remain within these sensitive areas suggesting that their use as a 'constraint' has been limited.

The ES also sets out a series of measures which it anticipates may reduce impacts - including forestry removal and peatland 'restoration'. Many of the proposed measures are either unproven or small scale and will do little to offset the scale and extent of damage the ES states this development will cause.

The process

Because this development will affect a site protected under European law, Scottish Ministers are required to consider a series of legal tests as set down in the Habitats Directive before consent can be issued. From our analysis above it is clear that we believe the proposal **will** have an adverse effect on the integrity a number of sites (Test 1). If Scottish Ministers agree, they must then consider whether there are any alternative solutions to this proposal – including other locations or technologies (Test 2). They must also consider whether there are 'imperative reasons of overriding public interest' which justify allowing such a development (Test 3).

The ES has failed to show that there are no alternative solutions, nor has it shown that there are imperative reasons of overriding public interest.

An international context

If this development goes ahead, it would set a very dangerous precedent for all internationally important sites. They are protected in law for a reason. Further information about the proposal and links to the full Environmental Statement are available on the RSPB website at: www.rspb.org.uk/scotland

For further information, please contact:

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