

Submission to the Local Government, Planning and Housing Committee: Building huge windfarms on peatlands isn't going to help Scotland fulfil its net zero targets, protecting and restoring peatlands will.

February 2024

The challenge

A globally rare habitat and natural carbon store, peatlands occupy just 3% of the world's surface. Scotland's uniquely placed to protect this global carbon and biodiversity resource with a land area that is 25-35%¹ peatland. However, siting wind farms on peatland is compromising this carbon store - "Just one hectare of peatland can contain 5,000 tonnes of carbon that starts to be released into the atmosphere when wind turbines are installed."² Meeting Scotland's climate change targets requires planning decisions that protect its natural carbon stores alongside boosting renewable energy production.

What's happening under NPF4 Policy 5

NPF4 Policy 5 is intended to protect peatlands. This isn't happening because developers are not providing a carbon audit for the development and decision makers aren't able to determine whether developing the area for renewable energy 'optimises the contribution of the area to greenhouse gas emissions reductions targets' as required by NPF4 Policy 5c) ii).

Why this is a problem

The pace at which we are destroying peatland in Scotland under planning policy outstrips the pace we are restoring peatland under the Peatland Action Fund and Peatland Code. 218 out of the 456 wind farms that have already been built in Scotland are on peat.³ Of a further future 73 sites, 61% are peatland.⁴ Continuing to construct wind farms on peat is going to have an increasingly high environmental and carbon cost as the National Grid decarbonises.

Renewable energy development on peatland - examples under NPF4

1. Glen Ullinish II wind farm, Skye, in planning. All turbines on Class 1 peat (peat that has been mapped as nationally important - includes carbon-rich soils, deep peat and priority peatland habitat). 613,000 cubic metres of peat to be excavated. 12.3 year payback period.
2. Energy Isles wind farm, Shetland, consented in November 2023. 26 out of 29 turbines on Class 1 peat. Permanent loss of 17.5 ha, temporary loss of 21.6 ha of peatland. 55ha target offsite restoration target.
3. Cloiche wind farm, Monadhliath Mountains. 29 turbines consented in November 2023 on a site that NatureScot described in their additional information response as 'extensive areas of nationally important montane blanket bog which would be lost due to the proposed development'.

¹ James Hutton maps commissioned by the Scottish Government

² <https://www.abdn.ac.uk/stories/peatland-windfarms/index.html>. The exact emissions would depend on the depth of the soil and the condition of the peat.

³ 'Renewable Future', research by Yujuan He. Data used was updated to January 2023.

⁴ 'Renewable Future', research by Yujuan He. Data used was updated to January 2023.

4. Glen Lednock wind farm, Highland Perthshire. 12 turbines proposed on Class 1 peatland.

What we are asking of the Committee

We ask the Local Government, Housing and Planning Committee to review the implementation of NPF4, particularly Policy 5, and recommend changes to wording and new guidance to support Policy 5's intention and the NPF4's overarching objective to reduce carbon emissions from land use change and development.

We suggest the following revision to NPF4 Policy 5 is considered (revision in italics):

'c) Development proposals on peatland, carbon-rich soils and priority peatland habitat will only be supported for:

- i. Essential infrastructure and there is a specific locational need and no other suitable site;
- ii. The generation of energy from *small-scale* renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets;
- iii. Small-scale development directly linked to a rural business, farm or croft; ...'

We also ask Committee members to consider our suggested actions listed below.

Additional actions

- National Peatland Plan updated. To bring all the national peatland policies together into a plan for protecting and restoring peatlands, and ensure policies are complementary.
- New guidance for the interpretation and application of Policy 5 wording on what evidence is needed to meet the Policy 5 requirement that there is a 'specific locational need and no other suitable site'. This guidance should direct renewable energy developments away from peatland.
- Require renewable energy developers to submit full carbon audits for development and demonstrate how they satisfy NPF4 Policy 5c) ii).
- Ensure compliance with NatureScot guidance which requires ambitious offsite and onsite peatland restoration and re-states the mitigation hierarchy which should be applied by developers when designing development.
- Urgently revise the carbon calculator – to ensure accurate estimates of carbon emissions resulting from onshore wind development on peatland can inform Planning Authorities about whether a development optimises the site's contribution to greenhouse gas reduction.