

**INTERNATIONAL MIRE
CONSERVATION GROUP**

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Consents and Emergency Planning Unit
Scottish Executive
Meridian Court
5 Cadogan Street
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Greifswald, February 2, 2007

Dear Sir/Madam,

**Lewis Wind Power : Application for 181 wind turbines, Isle of Lewis
Addendum (2006) to the Environmental Statement**

The International Mire Conservation Group (IMCG) is an international network of peatland specialists encompassing a wide spectrum of expertise and interests, from research scientists to consultants, government agency specialists to peatland site managers. The network currently has over 400 contacts in almost 60 countries.

The IMCG has become aware of the proposal to build a large wind farm (initially, 234 x 3MW turbines but now reduced to 181 x 3.6MW turbines) within the northern part of the Isle of Lewis, Outer Hebrides. Through the early post-war work of Hugo Oswald (1949) in company with Arthur Tansley and Harry Godwin, this area has long been known to be one of the great expanses of blanket peat, both in Britain and indeed within the broader context of Western Europe. Subsequent accounts by Ratcliffe (1977), Goode & Lindsay (1979), Hulme & Blyth (1984) and Hulme (1985) have emphasised the distinctive character of these Lewis peatlands, particularly when compared with that other great blanket peat landscape, the Flow Country of Caithness and Sutherland, which the IMCG was fortunate enough to visit for an extended period in 1986.

The proposal to build a windfarm, with all its attendant infrastructure, across some 140 km of the blanket bog landscape of Lewis, represents a major threat to this internationally important, and internationally recognised, part of Europe's natural heritage. The IMCG has had sight of the Environmental Statement prepared by the developer, and has been greatly alarmed by the naïve approach adopted in relation to a range of peatland issues. It does not follow accepted practice for assessment of peatland habitats, it adopts a number of highly-questionable positions on various ecological issues, and appears to favour a minimalist view of impact evaluation rather than genuinely seeking to identify the realistic scale and extent of combined potential impacts.

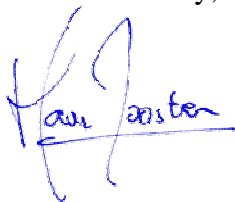
To give some specific examples:

- The classification systems involved, for example for the hydrological typology and for the identification of 'active blanket bog' are not based on accepted systems. The 'hydrological zones' are a poor substitute for the standard typologies, and the definition of 'active blanket bog' adopted here is likely to be rejected as deeply flawed by the various authorities responsible for administration and implementation of the EU Habitats Directive.
- The developer states that 'floating roads' will be used across 70% of the site because the peat is so deep, and floating roads have little impact on the hydrology of the bog. This is incorrect because any linear structure such as this will cut across the natural flow of water through the bog surface.
- Besides, such roads will sink into the peat if they are not supported by solid pilings, and if they sink they will increasingly cause widespread diversion of surface and sub-surface water flow.
- Even if, in places, drainage is provided beneath such roads, this will locally concentrate flows and so potentially stimulate erosion downslope.
- The developer seems to be suggesting that an estimate of likely drainage impacts over the 25-year life of the windfarm can be derived from a single study lasting no more than a year and measuring only a limited range of factors. Given the developer's own repeated admissions that the science and ground conditions are uncertain, this position appears untenable as a genuine attempt to identify the possible extent of impacts through the life of the windfarm and beyond.

In sum, the scheme is ill-advised in terms of its location, ill-conceived in its approach to impact assessment for peatlands, and ill-prepared both in terms of the information gathered and in the evaluations made on the basis of that information

The IMCG therefore urges the Scottish Executive in the strongest possible terms to refuse this application.

Yours faithfully,



Dr. Hans Joosten, IMCG Secr.-Gen.

References

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