

Ashton M (Mark)

From: Redacted
Sent: 26 November 2019 12:21
To: Ashton M (Mark)
Cc: Econsents Admin; Esme Clelland
Subject: Kirkan Wind Farm Additional Information Consultation

Dear Sir/Madam

Thank you for consulting us on the additional information provided for the proposed Kirkan Wind Farm. Please refer to our previous comments in our letter dated 7 June 2019, which remain relevant. We welcome the additional information provided on peat assessments and the renewable energy policy position and context.

The planning statement and Supplementary Environmental Information report predict a c.10% reduction in peat extraction volumes following changes to track layout and design. However, a substantial amount of peat extraction will still be required should this development proceed. We note the policy position set out in the planning statement, including the declaration of a 'climate emergency' by the First Minister and the Highland Council. It is also important to recognise the crucial part that peat plays in carbon storage, therefore it is vital that peat extraction and related carbon emissions are minimised in development as far as possible, as set out in paragraph 205 of Scottish Planning Policy. Where peat loss and disturbance is proposed, sufficient compensation and offsetting, such as effective peatland restoration, must be provided.

In terms of national policy positions and context, we would also highlight the IPBES report on biodiversity released in May 2019 and the State of Nature 2019 report from October 2019, both of which give a stark review of the state of biodiversity to date and emphasise the crisis that many species face. In September 2019, the Scottish Government published its 2019-2020 Programme for Government, which recognised the way that both biodiversity and climate change crisis are interrelated, stating "*We recognise the importance of biodiversity and the complexities and challenges that tackling its loss presents. Biodiversity loss and the climate emergency are intimately bound together: nature plays a key role in defining and regulating our climate and climate is key in shaping the state of nature*". The current biodiversity crisis and the government's position must also be material considerations in the determination of this application.

Kind regards, Alison

Alison Phillip

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