

Flow Country Partnership and Steering Committee
The Highland Council
Glenurquhart Road
Inverness
IV3 5NX

14 June 2024

Dear Flow Country Partnership and Steering Committee Members,

Response to IUCN Recommendation

I am writing on behalf of Scottish Renewables in response to the IUCN Recommendation of The Flow Country for inscription as a World Heritage Site (WHS) based on criteria IX. We are pleased to be engaged in the conversation about this important site and a member of the steering group.

However, we are deeply concerned with the recommendations coming from IUCN to expand protections for the proposed site and to not approve the development of onshore wind within the boundaries of the proposed site. These recommendations do not reflect NPF4 2023 or the intent of designating a WHS based on Outstanding Universal Value (OUV).

Scottish Renewables notes that the IUCN have found that legal and planning protections already in place in Scotland are adequate to protect and achieve the positive management of the OUV of the candidate WHS. In their report they note that the most pressing threat to this site is climate change. There is no evidence that wind farms will necessarily impact adversely on the OUV. IUCN's recommendations seem to push an agenda rather than science or the World Heritage Committee's own approach to OUV.

How NPF4 Supports Both Onshore Wind Development and Biodiversity

The two twin themes of NPF4 are the climate and nature crises. Key goals and purposes of NPF4 policies are to prioritise the protection of biodiversity and to support the development of renewable energy projects, emphatically including onshore wind projects, in line with Scotland's ambition of achieving 20GW of operational onshore wind energy by 2030. Policy 11 supports the development of onshore wind in all areas, except in National Parks and National Scenic Areas. It does not advise against the development of onshore wind in World Heritage Sites designated for OUV.

NPF4 Policy 7(l) advises that:

“Development proposals affecting a World Heritage Site or its setting will only be supported where their Outstanding Universal Value is protected and preserved.”

Therefore, NPF4 gives no support for an approach that attempts to prevent *any* development of onshore wind within a WHS. Rather, NPF4 policies 3, 5, and 11 emphasise the need for a case-by-case approach to all onshore wind development both within and outside any area designated for its nature conservation value. Scottish Renewables would therefore expect planning decision makers to follow NPF4 and its intent of addressing both climate change and the nature crisis. Since the IUCN has found that legal and planning protections already

in place in Scotland are adequate to protect and achieve the positive management of the OUV of the candidate WHS, Scottish Renewables requests the IUCN amend recommendation 5 so that it reads as set out in the conclusion of this letter.

Development Outside the Boundary of the Proposed Site

The IUCN recommendation is based on criteria IX: The outstanding importance of The Flow Country lies in its extent and continuity, the diversity of mire and vegetation types, and the on-going processes of bog formation which it exhibits.

This criterion is not based on landscape or visual impact, as the habitat is not impacted by visual setting. The draft 'Management Plan for the Proposed Flow Country World Heritage Site' explicitly states:

"In the context of the setting, the proposed OUV of The Flow Country is focused on ecosystem processes (criterion ix), and biodiversity (criterion x), and not natural beauty (criterion vi). This means that there is no explicit link between OUV and important views, visual relationships or natural beauty. This is not to rule out any importance attributed to views in terms of appreciation of OUV, but technically there is only a very marginal link to OUV, as set out below."

It is therefore inappropriate for draft recommendation 5 to refer to development outside of the boundary of the proposed WHS.

A Missed Opportunity to Collaborate to Protect Peatlands

It is disappointing that the IUCN has entirely failed to recognise the existing strong synergy between the enhancement of features such as those addressed in criteria ix and onshore wind development.

Onshore wind developers are and have for years been strong and effective promoters of biodiversity enhancement and restoration. Existing wind farms should be considered part of the existing landscape of the proposed WHS, and new applications should be considered as NPF4 intended—both inside the proposed WHS boundary and surrounding it.

Creating barriers to wind farms would also create barriers to the significant opportunities to secure peatland enhancement as part of new onshore wind proposals, within and around the WHS. It is important that sustainable development intended to address the climate crisis recognised and addressed in NPF4 be supported by the proposed WHS.

The Scottish Government's Onshore Wind Policy Statement (OWPS) 2022 supports the continued development of onshore wind by clearly stating, '**onshore wind development has a strong track record of delivering both peatland and other biodiversity benefits**'. In fact, Scottish Renewables has published a report of case studies where onshore wind developments have benefitted peatland restoration: ['Wind Power and Peatland: Enhancing Unique Habitats'](#). There can continue to be positive synergies between onshore wind and peatland interests in catchments with a pathway to The Flow Country as we have seen with other developments.

This approach is particularly underpinned by paragraph 3.3.8 of the OWPS:

"Overall, the onshore wind sector in Scotland has made remarkable advances over the past decade in mitigation and restoration solutions for peatland, with environmental agencies and

the renewables sector working together to update the good practice guidance for the construction of wind farms in 2019. In addition, Scottish Renewables have considered this issue and published their Wind Power and Peatland: Enhancing Unique Habitats which aims to promote best practice across the sector.”

Paragraph 3.5.7 of the OWPS also says:

“Evidence shows that significant positive effects for biodiversity from wind farm developments can be achieved and examples of best practice of onshore wind developers enhancing biodiversity on their sites is available at Annex 1. We expect all developers to draw from these best practice examples and demonstrate a clear commitment to protecting and restoring habitats.”

Efforts to limit development of onshore wind in and around the proposed WHS underscore a worrying lack of understanding of how onshore wind developments support biodiversity and the goals of protecting OUV.

Conclusion

Scottish Renewables recommends that the Partnership requests that IUCN amend draft recommendation 5 to reflect expectations set by NPF4 and state:

5. Requests the State Party to ensure that any proposed developments within the property that may impact on its Outstanding Universal Value (OUV) are assessed for their potential impacts, in line with the Guidance and Toolkit for Impact Assessments in a World Heritage Context, prior to making any decision that would be difficult to reverse.

Scottish Renewables looks forward to working with The Flow Country Partnership and the steering committee to appropriately respond to the IUCN recommendations. As it stands, Scottish Renewables, as a member of the steering committee, cannot support the IUCN recommendation and would be public about our concerns.

Should this site be inscribed, it is important that the intention set out in NPF4 to address both biodiversity and the climate crisis be honoured by not limiting the development of onshore wind within and around the proposed WHS boundary.

Sincerely,



Megan Amundson
Senior Policy Manager | Onshore Wind & Consenting
Scottish Renewables