As the IUCN UK Peatland Programme has a specific focus on the sustainable management and usage of peatlands this answer therefore is specifically addressing question 3 of the consultation:

Do you have comments or amendments on any aspects of the new guidance for onshore wind?

We have answered via email to fully reference and expand our answer. This response is not confidential.

We recognise that there is an important role for renewable energy projects both in the production of clean energy and in the creation of green jobs. Reducing greenhouse gas emissions and limiting global temperature increases will alleviate some of the stressors on the UK's natural environments. As a programme we recognise that there will be a place for the construction of wind and solar projects onshore. However, we are concerned about the the National Policy Statements (NPS) (particularly those within EN-3, although we discuss some points from EN-1 too) under consultation here as they relate to peatlands on several fronts.

While EN-1 does mention blanket bog and lowland fen as irreplaceable habitat within section 5.4.16 both - along with a number of others - are included under the heading of '*Ancient woodland, ancient trees, veteran trees and other irreplaceable habitats'* this is suggestive that other irreplaceable habitats are lower priority than those named in the heading. Moreover, the NPS (EN-3) do not mention 'irreplaceable habitat' [1] per the government guidelines for biodiversity net gain (BNG) at all, despite multiple mentions of 'peatland'. We highlight the following sections as needing alteration to reflect the important and irreplaceable nature of these habitats.

Section 2.3.6:
"*Secretary of State will take as the starting point that the relevant tests in Sections 5.4 and 5.10 of EN-1 have been met, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the urgent need for this type of infrastructure."*

It is of concern that the stronger language used in the irreplaceable habitat guidance (see following paragraph) is absent in 2.3.6, and we would like to see this amended to place greater emphasis on the need to avoid construction on these sites. It is our opinion that there is also greater clarity needed around what classes as 'urgent need', and detail of how that standard will be met. Additionally, we are concerned that the wording 'significant adverse effects', implies a degree of tolerance for detrimental effects. However, this is not the objective of ORNECS or HRA both of which seek to apply precautionary principles to protect the designated features of a site from any adverse effects.

Within the NPS 'peatlands' are also notably not disaggregated in the text of EN-3 to cover 'blanket bog' or 'lowland fen' both of which are classified as irreplaceable habitat. The irreplaceable habitat guidelines state that:
"You will only get planning permission for development that results in loss of irreplaceable habitat in exceptional circumstances."[1]

The NPS EN-3 however, includes a number of points around 'peatland habitats'. We feel that the use of 'peatland' obscures that many of these proposed sites are likely to be on one of the two

[1] Irreplaceable habitat - GOV.UK

irreplaceable habitat types; 'blanket bog' or 'lowland fen'. These terms should be used to provide clarity and align with the guidance. However, if the intention is to protect *all* peatland types, we support this, however, the irreplaceable habitat guidance should then be updated to reflect this.

The following sections considering the specific impacts of onshore windfarm construction also do not discuss peatlands in the context of being irreplaceable habitats:

2.12.74 *Onshore wind farm sites within England may be proposed on peatland. Peat soils are rich in carbon and disturbance can lead to climate impacts. Peatlands are sensitive habitats that are important for many species of flora and fauna. In some instances, soil disturbance may lead to change in the local hydrological regime which can affect biodiversity and the water environment. Applicants should therefore seek and rule out other locations before siting developments on peatland.*

2.12.75 *Where developments are proposed on peatlands, applicants should conduct a detailed peat survey.*

2.12.76 *New guidance is available from NatureScot on a good practice approach to development on peatlands. Where the survey has identified the presence of peat, applicants should demonstrate adherence to these principles in development design. For example, infrastructure should be sited on areas of shallower peat, and soil disturbance should be minimised.*

We feel that some of the language used in the above sections needs to be strengthened and there are some additional concerns linked to the usage of other guidance, which we address by point.

- Section 2.12.74 States that soil disturbance '*may lead to change'*. It is well evidenced in the literature however, that there are a wide range of impacts on the ecological, hydrological and physical properties of peat soils associated with development and infrastructure[2,3]. These impacts could be better discussed and detailed in the text and language should reflect the 'knowns'.
- Section 2.12.75 Language employed here could read as a survey being optional, while we do not think that this is the intention here reading EN-1, we feel that it should be clarified to 'must conduct' or similar.
- Section 2.12.76 This section refers to the NatureScot guidance, however, that guidance also refers to use of the carbon calculator which an independent report recently commissioned by the Scottish Government (Jan 2025) highlighted areas of concern with the calculator[4]. Therefore, it is appropriate that these concerns are addressed before this tool is applied across England's peatlands.
  The suggestion in the last sentence of 2.12.76 that developing on shallower peats is preferable is also not supported by the literature[5,6]. 30-40 cm of peat depth represents upwards of 300 years of accumulation of peat. On SAC designated sites there is a

[2] iucn-uk-peatlandprogramme.org/sites/default/files/2025-03/Tracks and roads on peatlands - March 2025.pdf
[3] Peatland and Development March 2023 - FINAL.pdf
[4] Carbon Calculator for wind farms on Scottish peatlands: an evidence assessment | ClimateXChange
[5] Use of Peat Depth Criteria - Accounting for the Lost Peatlands_1.pdf
[6] Avoid constructing wind farms on peat | Nature

requirement that 'functionally linked land' from non-designated areas also be included in habitat regulation assessments, this would include some of these habitats. The ideal sites would generally be situated on mineral soils.

We would also highlight a further section which pertains to solar arrays rather than onshore wind. However, the threat is similar as there is a possibility that this could be an attractive option for lowland sites in the future which could include fen areas.
Section 2.10.26: *"This should include consideration of mitigation against impacts to peat soils where these are present."*

The use of 'consideration of mitigation' does not imply a presumption against development on lowland fens in line with the irreplaceable habitat guidelines. Additionally in line with the use of 'peatlands' here we also recognise that lowland raised bogs may be at risk from such development.

<u>The following section considers the lifespan of a windfarm:</u>

2.12.34 *Applicants should consider the design life of wind turbines when determining the period for which consent is required. Modern onshore wind turbines are now considered to have a significantly longer design life than the expected 25 years of early generation models. Therefore, it is expected that applicants may seek consent for at least 35 years, although applicants may seek consent without a time-period or for differing time-periods of operation.*

35 years may seem relatively long, however, in peatland terms, where development and significant accumulation occurs over millennial timeframes, it is a brief period. A huge amount of peat loss will have occurred in the construction of a windfarm constructed on peat, with the creation of cableways, cut and fill roads (while floating roads are preferred, conditions are often unsuitable) and the turbines themselves. Correspondingly, in 35 years we might expect approximately 3.5 cm of peat to accumulate on a site. This demonstrates that huge losses cannot be recovered even over the operational life of a windfarm, if sites are then recommissioned there will be further losses. These represent a loss of ecohydrological function and alongside, impacts to the carbon store, on water quality and natural flood management functions. In our response to the NPPF consultation, we highlighted the issue with taking a short-term approach. There is enormous pressure to act decisively on climate change mitigation measures, and we support this. However, as we transition to greater green energy provisioning, losses created by constructing on peatlands will likely offset the initial gains, this is supported by the evidence[7]. Whilst helping with the Government's Clean Power 2030 Action Plan, this would be counter to the UK's legally binding 2050 Net Zero goal. Long-term this has the potential to create another problem which will need to be fixed. Therefore, we urge that the NPS make a stronger presumption against the construction of renewable energy sites across peatlands and more strongly recognise their irreplaceable nature in order to avoid future rectification.

[7] Avoid constructing wind farms on peat | Nature