Scottish Environment LINK

Scottish Environment LINK Concern Paper for the Environmental Advisory Forum For Renewable Energy (EAFRE)

Introduction

Following the first meeting of EAFRE representatives were given the opportunity to submit 'concern papers' to the Scottish Executive outlining those 'bigger picture' issues, above and beyond the need review of NPPG 6, which members felt should be addressed in order to facilitate the role out of renewables.

These issues are not new. In both our energy policy statement and in the evidence we submitted to the parliamentary inquiry into renewable energy in Scotland we highlighted our concerns and sought Executive action.

The key points arising from these papers and based on the experience of our member organisations are listed below:

1. A Scottish Energy Strategy

The Executive should consult on and prepare a **Scottish Energy Strategy**;

- to co-ordinate and drive forward action on demand reduction and energy efficiency,
- to maximise the opportunities for renewable energy and
- to prevent ad hoc development in areas that require protection.

It should encourage a shift away from polluting technologies (coal, oil & gas, nuclear) to a combination of energy efficiency (with targets), reduced consumption (with targets) and renewable energy generation from a wide range of sources and technologies.

The Scottish Energy Strategy should encourage local energy generation and supply. The Strategy should clearly relate to other government strategies which should seek to reduce overall energy consumption, in particular, transport and waste. All Scottish Executive Departments and Agencies should contribute to the Strategy by, at a minimum, ensuring that their own frameworks and plans consider energy issues.

2. Targets

The Scottish Executive has taken a clear lead in endorsing renewables, and has set good targets for electricity from renewable sources - 40% of electricity production to come from renewables by 2020. This is a great start. These need to be complemented by targets for demand reduction and efficiency improvements.

3. Nuclear

The Scottish Executive should continue to resist the construction of any new nuclear capacity in Scotland, instead ensuring national investment in energy efficiency and expansion of appropriate renewable energy generation.

4. Planning and location

Scotland's National Planning Framework should address the implications of an ambitious and wide-ranging energy strategy. The Strategic Environmental Assessment Regulations and forthcoming Bill should be applied to energy policy. We

support the development of combined oil & gas and offshore renewables strategic environment assessments provided the strategic areas chosen are based on the ecosystem approach and look forward to working with the Scottish Executive and DTI to ensure that these are well informed and comprehensive.

We welcome the Executive announcement that SEA of the Scottish coastline will be carried out in order to help investors identify potential offshore sites for wave and tidal power developments. Greater clarity regarding the policy framework for decision-making in the marine environment for all types of renewable energy would also be welcome.

Onshore wind energy schemes are currently meeting virtually all of Scotland's renewables targets, which other technologies can increasingly contribute to in the future. The scale of onshore wind development needs to be planned for now. LINK members endorse the need for a national, locational framework and the crucial role which national guidance will play. The locational work carried out by Scottish Natural Heritage[1] is a welcome start but there is further work urgently required by other parts of Government. Meanwhile, sites where current carbon-storage capacity would be compromised by development should be avoided.

5. Protecting the wild land resource

Scotland has a much treasured and finite resource of wild land and seascape. Wildness in Scotland's countryside, islands and seascape is a quality that is valued by Scots and by people from all over the world, not only in the remotest parts of Scotland but also in more managed countryside, and it is a key resource of Scotland's tourist industry. The quality of wildness is particularly vulnerable to some forms of energy generation, such as wind turbines on high ridges, hydro schemes in remote areas, and offshore wind turbines or other marine technologies close to the shore. A Scottish Energy Strategy must protect wild land qualities in Scotland's countryside as well as the small declining reserve of remote wild land and sea passages.

6. National Grid (Transmission, Distribution and Connection)

The Executive should consider and consult widely on the needs and implications of an upgrade of the Scottish electricity grid. The current approach to transmission upgrades is entirely demand led and the subject of considerable conflict. SEA could be utilised to establish a robust and transparent approach to transmission and distribution.

Separate consideration of developments and grid connections should also be ended, enabling decision-makers to evaluate the total impacts of one proposal rather than evaluating them separately.

7. Baseline Data

To meet energy objectives, to plan appropriately and for regular comprehensive monitoring, Scotland will need accurate data on energy production and consumption.

8. Research and Development

An ambitious Scottish Energy Strategy will need commitment of substantial monies for research into new and developing technologies, and into potential implications of their application in Scotland. This programme should be imaginative and wide-ranging, including options such as geothermal imports, tidal flow, wave, offshore

[1] SNH *Strategic locational guidance for onshore wind farms in respect of the natural heritage,* 2002

wind, biofuels, solar, and should include innovative transport, heating and energy saving technologies.

Effective monitoring and research is required in order to fully understand the impacts of individual developments and improve decision-making.

9. Stakeholders

Development of the strategy will need full and genuine consultation with all stakeholders. Stakeholders, including communities, should be consulted about all plans, policies and schemes. There should be maximum community ownership of, and community benefit from, any schemes.

We welcome the creation of EAFRE but are concerned that this Forum has no formal relationship with the Forum for Renewable Energy Development in Scotland (FREDS). These remit of these forums clearly overlap and a formal relationship must be established.

10. The Economy

The Enterprise Network should be required to develop policies and plans to realise the employment potential of the Scottish Energy Strategy.

11. The Scotland Act

It will be important to Scotland in the future to be able to adapt and develop its Energy Strategy to meet its needs and responsibilities. With energy issues divided between Westminster and Holyrood, it is important that these two administrations work together to the same aims, determined by the Scottish Energy Strategy. If it proves necessary to improve delivery, lead responsibility for one issue or another could be transferred.

12. Peat

Under the EU Habitats directive the Scottish Executive has a legal obligation towards the protection of peatland habitats which extends beyond those areas which have been designated as N2K sites. Whilst there is clear forestry policy to protect such habitat from tree planting, there is no equivalent policy in relation to devleopment planning and in particular renewable energy developments.

13. Biomass

In order to deliver a sustainable biomass energy policy, which delivers carbon savings, the planning of biomas developments should be coordinated with forestry policy. This should be done to ensure appropriate location and type of processing facilities to minimise haulage distances and road improvements as well as to facilitate local fuel provision for district heating systems.

Anne McCall, January 2004
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