



Scottish Government Debate:

“Faster and Further to Secure Scotland’s Place as the Green Energy Powerhouse of Europe” Thursday 2 June.

Summary

Climate change is the single biggest threat facing wildlife and people. Renewable energy, in the right places, can help mitigate the impacts of climate change on the natural environment, and will play a key part in our energy supply, our economy, and in moving Scotland towards a sustainable future. RSPB Scotland is working with the renewable energy industry and Scottish Government to help ensure that renewables are delivered in the right locations, avoiding sensitive habitats and species. This not only ensures that the environment is not damaged while we work towards meeting our climate change targets, but reduces risk for developers and their investors. We welcome and support the growth of this important industry, and believe that Scotland’s renewable energy potential can be fully delivered without environmental harm, thus providing a sustainable best-practice model for the development of renewable energy across the world.

The need for correctly sited renewables

RSPB Scotland believes it is crucial that Scotland meets its necessarily strong and ambitious climate change targets. Renewable energy has an essential role to play, and Scotland has considerable opportunities both on land and at sea. In order to do this in a truly sustainably manner, we strongly advocate the use of renewable energy projects that are correctly located in order to prevent damage to important wildlife sites. Our report *Scotland’s Renewable Future*¹ provides examples of best practice by developers, such as those at Black Law and Whitelee and Siadar Bay, Lewis.

Whilst RSPB Scotland is often most visible when objecting to proposed developments, we are strongly in favour of well-designed and appropriately located renewable energy generation. In fact, the RSPB objects to less than 10% of the windfarm proposals that we comment upon (please note that we are not a statutory consultee). RSPB Scotland’s planning and conservation staff work closely with renewable energy developers to provide advice on the suitability of development sites before planning applications are made. We have established good links with renewables developers and industry bodies, such as Scottish Renewables, allowing us to discuss individual proposals and provide guidance on environmental good practice, both onshore and offshore. For instance, good practice principles for wind farms on peatland have been developed by RSPB Scotland, Scottish Renewables and other environmental NGOs in Scotland². Early contact enables us to flag up sensitive sites and steer developers away from areas of potential risk. Such consultation can also help the design of developments early on, so significant environmental harm and delays in the planning process can be avoided. This helps ensure that more developments are delivered in the right places, meeting the urgent need to reduce greenhouse gas emissions and tackle climate change, without damaging our most important places for wildlife.

Marine renewables

RSPB Scotland supports the Government’s ambitions to deliver marine renewables if developed in a sustainable manner: our vision is of a thriving industry that will help reduce the causes of climate change and bring secure long-term jobs while safeguarding biologically diverse, productive seas. Climate-induced reductions in food availability during the breeding season are already causing declines in populations of some seabird species in many areas of Scotland. This further highlights

¹ http://www.rspb.org.uk/Images/ScotRenew_tcm9-184194.pdf

² <http://www.scottishrenewables.com/news/conservation-groups-and-renewable-developers-agree/>

the urgent need to develop low carbon energy, while ensuring that human activities in the marine environment do not undermine the resilience of seabirds especially, but also entire marine ecosystems under increasing stress from climate change. However, inappropriately designed and/or sited developments can cause serious and irreparable harm to marine biodiversity, and could damage the public acceptability of the necessary transition towards renewables. Renewables must be developed in a manner that ensures Scotland's marine environment and resources are protected for future generations.

RSPB Scotland believes such sustainable development is possible thanks to the Marine (Scotland) Act 2010, with its duty to deliver Scotland's first statutory system of marine planning. As well as benefiting industry and regulators, a marine planning system – if carried out properly – can ensure the sustainable use of marine space and resources, while protecting and supporting a healthy, functioning marine ecosystem. Scotland's National Marine Plan, currently being drafted, must ensure that marine renewables are developed in line with the principles of sustainable development, and so in a manner that ensures Scotland's marine environment, and the resources it provides, is protected for future generations. The Plan must give clear guidance to renewables developers and decision makers on where activities will be encouraged, and where they should be avoided to protect sensitive species and habitats. The Plan must ensure that decisions are made in accordance with EU Environmental legislation, and the requirements of Scotland's new Marine Act which include a coherent network of Marine Protected Areas by 2012.

We see the income from marine renewables as a significant opportunity for Scotland to deliver innovative and lasting projects to protect and enhance our environment. Such projects would, in turn, bring social and economic benefits to communities across Scotland. By reinvesting money into projects which have positive environmental outcomes, the Scottish Government could spread the benefits of the new energy revolution widely and equitably across Scotland, and help deliver clean, healthy, safe, productive, biologically diverse seas for future generations.

Case Study: Black Law windfarm, central Scotland

This development is located in an area extensively damaged by mining, afforestation and drainage of wet heathland. In terms of bird interest, it is host to a locally important population of breeding waders. RSPB Scotland worked closely with the developer, ScottishPower Renewables, Scottish Natural Heritage (SNH) and the three local Councils, securing habitat mitigation and enhancement to benefit breeding waders, farmland birds and blanket bog. The resulting Habitat Management Plan covers 1,440 hectares (ha) and is the largest heathland restoration project in the region. Work includes restoration of a former opencast coalmine, removal of a conifer plantation, restoration of a watercourse to benefit otters and water voles, and modifications to the wind farm design to reduce its environmental impact. An Ecological Clerk of Works was appointed to oversee construction, implementation of the Habitat Management Plan, and pre- and post-construction bird monitoring as required by the planning conditions. RSPB Scotland was delighted when Black Law wind farm was awarded the Best Renewable Project in the 2005 Green Energy Awards. There is now a proposal to extend the wind farm, and we hope to continue to work with ScottishPower Renewables to ensure the high standards of the initial development are continued in this and any future projects.

While Black Law is a best practice example of development, poorly located developments must be refused by Scottish Ministers, as the proposal on the Lewis peatlands Special Protection Area (SPA) was in 2008³. If Scotland wants to develop an international reputation as a leader in the sustainable development of renewable energy, the Scottish Government needs to ensure that damaging

³ <http://www.rspb.org.uk/news/details.aspx?id=tcm:9-187928>

proposals such as those at Stacain in Argyll and Waterhead Moor in Ayrshire, which are proposed in internationally important sites for wildlife, are quickly refused.

Power of Scotland Secured

According to research by leading energy consultants, Garrad Hassan, Scotland could phase out all fossil fuel power by 2030 whilst maintaining a secure electricity supply and generating significant revenue from renewable exports, without endangering important environmental interests. It is now widely recognised that renewables could grow to comfortably exceed our electricity demand by 2020. But the summary report, *The Power of Scotland Secured*⁴, also shows that by 2020, renewables could be providing over 100% of Scotland's electricity needs, and 185% by 2030. By combining this level of renewable electricity production with moderate efficiency measures, Scotland could decarbonise at least 50% of our total energy needs by 2030.

The report shows that contrary to popular myth, the variability of renewable power need not threaten the security of supply in Scotland, even in the context of a full phase out of conventional thermal power. In fact, the transmission infrastructure required to keep the lights on at times of low renewables output will be easily justified by the value of exports which it will make possible at times of high output. Moreover, if home heating and transport are electrified, and modest demand management achieved, a 100% renewable grid system in Scotland could make overall household 'triple fuel' bills lower than in conventional scenarios. In terms of thermal generation, in the medium to long term there is no need to rely on coal for our energy security. Although Carbon Capture and Storage (CCS) has potential value in accelerating decarbonisation of the energy sector in the shorter term, new fossil fuel power stations such as the proposal at Hunterston in Ayrshire are not required. This proposal would seriously damage an important wildlife site, increase carbon emissions and have detrimental impacts on the area, and so should be refused⁵. CCS should not be used to justify building new capacity, but should be retrofitted on existing power stations such as Longannet and Peterhead. Globally, demonstrating the commercial and technical viability of retrofit CCS will make the most difference to our emissions. It is also essential that CCS is not used for enhanced oil recovery. Using captured CO₂ to extract more hydrocarbons would be perverse in the context of the climate change threat.

Conclusion

Scotland has huge potential in the growth of the renewables industry. There is more than sufficient renewables capacity to meet our ambitions without having to develop sensitive sites.⁶ Renewable energy generation in Scotland can grow to comfortably exceed our electricity needs, bring in substantial export revenue, and allow for significant electrification of the heat and transport sectors, helping us meet our climate change targets. Along with demand management and energy efficiency, this can bring economic and social benefits to Scotland, and lead us towards a sustainable future.

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RSPB Scotland is part of the Royal Society for the Protection of Birds, the UK-wide charity which speaks out for birds and wildlife, tackling the problems that threaten our environment. Nature is amazing - help us keep it that way.

⁴ http://www.rspb.org.uk/Images/POSS_FinalReport_tcm9-272152.pdf

⁵ http://www.rspb.org.uk/Images/Hunterston_tcm9-255891.pdf

⁶ <http://www.scotland.gov.uk/Resource/Doc/47176/0014633.pdf>