

SUBMISSION FROM SCOTTISH NATURAL HERITAGE

Our role

We are a non departmental public body that provides advice on nature and landscapes. All forms of energy generation have some effect on our nature and landscapes. Our role is to provide advice which minimises these effects and which guides development to the right locations.

Whilst much of this inquiry will focus on areas out with our remit and expertise, we do have views on both supply and demand issues which we would like to submit to the inquiry.

Our role in energy is set out in [Energy and the natural heritage](#). The evidence submitted below is based on the principles set out in that statement.

Climate change

We strongly support the Scottish Government commitment to the transition to a low carbon economy and the ambitions set out in National Planning Framework 3 (NPF3). We view climate change as the most serious threat to our natural heritage and we are taking action to address this¹.

Switching to renewable energy sources is a key means of tackling climate change, as well as providing social and economic benefits. However, the transition to a low carbon economy, and the deployment of renewable energy should not come at any cost². NPF3 recognises the importance of the natural heritage to our economy, sense of identity and quality of life³ and that a balance needs to be struck between the move towards a low carbon economy and the need to protect the natural heritage.

The main way to reduce the effects of our energy use on the natural heritage is to ensure that generating stations which provide energy **supply** are in the right locations, and that **demand** is reduced. In our evidence below we suggest ways in which this can be best achieved. We also briefly refer to transmission.

Energy Supply

The main ways to reduce the effects of energy supply on the natural heritage are likely to be through a combination of the following:

- generating electricity close to demand, which reduces the need for new transmission infrastructure, although this needs to be balanced with the effects on communities and natural heritage issues;
- reducing carbon emissions associated with generation by switching to renewable energy and low carbon technologies. This includes the need to

¹ See [Climate Change and Nature](#) for more detail

² See [National Planning Framework 3](#), para 1.1 and 3.12 and our position statement on [Renewable energy and the natural heritage](#).

³ See [National Planning Framework 3](#), para 4.4

carefully assess the carbon implications of new developments, especially those which are built on peatland;

- adopting a plan led approach to the location of new generation capacity, as set out in [Scottish Planning Policy](#). We will publish further guidance on 'Spatial Planning for onshore wind – natural heritage considerations' in June to support this, and we are engaged in the development of marine sectoral plans for offshore renewables;
- adopting a diverse mix of technologies on and offshore as this will reduce the cumulative impact on important species, habitats and landscapes;
- applying high standards of assessment and design to new developments to ensure that impacts are minimised and mitigated where possible. We have published a wide range of award winning [guidance on renewable energy developments](#) to help to achieve this. We work closely with the renewable energy industry to develop new standards in the design, assessment and construction of renewable energy technologies.

Public sector leadership

We manage our own properties in a way that helps to deliver public sector leadership in the adoption of renewable energy technologies. We have [31 renewable energy systems](#) installed on the SNH estate, including wind, hydro, solar (PV and thermal) and heat pump technologies. These save around 540 tonnes of CO² emissions per annum.

Energy Demand

The most effective way to reduce the impacts of energy generation on the natural heritage is to reduce energy demand. This involves improving energy efficiency and finding lower energy ways of living and working.

We have a role to play by encouraging the development of green infrastructure which builds resilient, low carbon communities; supporting active travel and reducing our own energy usage. We look to others to help reduce energy demand in the workplace, industry, transport and domestic sectors.

To reduce energy demand we:

- encourage lower carbon transport through better place making and the provision of green infrastructure, providing benefits to health and communities. The Central Scotland Green Network, a National Development in NPF3, is a good example;
- encourage modal shift in transport and the use of alternative fuels, where these can be produced from sustainable sources, as encouraged by section 5 in NPF3;
- encourage the use of less electricity through the use of more efficient products in our homes and businesses, as encouraged by the Scottish Government's [Conserve and Save](#) energy efficiency action plan.
- will use less heat in our buildings through greater efficiency and significantly better levels of insulation.
- consume less energy intensive products

Public sector leadership

The transition to a low carbon economy requires strong public sector leadership. We have made significant commitments and investments to deliver this leadership. Our [Greening Strategy](#), [Low Carbon Vision](#) and [Carbon Management Plan](#) set out the key actions we are taking to do this.

Our [Annual Climate Change Duties report \(2013-14\)](#) demonstrates the progress we have made, delivering a 38.2% reduction in carbon emissions since 2000. These savings have mainly been delivered through the installation of renewable energy technologies; a reduction in energy use; changes to work based travel and reductions in the waste we produce.

Transmission

We cannot comment on the market implications of the need for improvements to the electricity transmission network as this is not our area of expertise. However, in terms of the effects on the natural heritage, we offer the following observations:

- overhead lines can have significant visual impacts, opportunities for undergrounding should be explored where impacts would otherwise be severe;
- early engagement and robust community consultation in the early stages of new transmission proposals can help to reduce time in the planning process.