

## PETITION PE1564 - Save Loch Ness and the Great Glen

### Introduction

Scottish Renewables has developed this briefing in response to the Public Petitions Committee request for information in relation to the consideration of the Save Loch Ness and the Great Glen petition.

Renewable energy is playing a crucial role in the Scottish and UK Government's efforts to tackle climate change and build a thriving industry in Scotland. Onshore wind makes the largest contribution of any renewables technology in Scotland, supporting 5,400 jobs and securing investment of over £700m last year<sup>1</sup>. Onshore wind is also the cheapest form of low carbon electricity generation that can be deployed at scale and continues to make growing contribution to the Government's overall objectives of reducing carbon, keeping bills down for consumers and increasing energy security.

### Background to the Great Glen

The Great Glen is a diverse working landscape with a range of activities and businesses operating within it, including:

- **Tourism**, including hotels, restaurants, shops, attractions and the landscape within which all those activities take place;
- **Agriculture**, including pasture for sheep and cattle as well as some arable use;
- **Forestry**, both broadleaf woodland with extensive areas of commercial forestry;
- **Energy**, including Foyers and Glendoe Hydro Schemes and infrastructure associated with these;
- **Transportation**, including one of Scotland main arterial road routes (The A82) and boats using the Caledonian Canal.

The landscape of the Great Glen is dynamic and constantly changing. It is a working landscape which provides sustainable economic opportunity for its residents.

### Protecting Scotland's landscapes

Scotland is world renowned for its landscape qualities, but also increasingly for its renewable energy industry and the industry recognises the need to strike a balance between the development of the sector and providing appropriate protection to Scotland's most valued landscapes.

Scottish Renewables believes it is for the Scottish Government and/or its agencies to determine which areas in Scotland are designated as National Scenic Areas or National Parks.

Roughly one fifth of Scotland's land mass is already designated as one or both, and these impose restrictions to protect our most valued landscapes<sup>2</sup>.

Scottish Renewables supported the Scottish Government's decision to rule out all onshore wind farm developments in our existing National Parks and National Scenic Areas. There are currently 40 NSAs in Scotland, all of which were designated following a survey by the Countryside Commission for Scotland in 1980. A review of the areas was also published by SNH in 1999 and it is SNH's stated priority for measures to be put in place to safeguard and enhance existing NSAs before identifying further new areas<sup>3</sup>. Any new designations should be based on clear and objective criteria and a comprehensive assessment and scoring process, and consultation with all relevant stakeholders.

### Climate Change and Decarbonisation

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<sup>1</sup> Department for Business Innovation and Skills (2015), The size and performance of the UK low carbon economy <https://www.gov.uk/government/publications/low-carbon-economy-size-and-performance>

<sup>2</sup> SNH Briefing on Wild Land: <http://snh.presscentre.com/Briefings/Wild-Land-a6.aspx>

<sup>3</sup> SNH (2000) Policy Summary: National Scenic Areas <http://www.snh.gov.uk/docs/A327497.pdf>

SNH has stated that: “Climate change is the single biggest threat to Scotland's nature and so to our lifestyles, economy and culture”<sup>4</sup>. Decarbonising our energy sector is central to reducing our carbon emissions and tackling climate change, and therefore to protecting our landscapes over the long term.

The contribution of onshore wind to helping tackle climate change and, therefore, helping to protect Scotland's natural environment should not be underestimated. In 2013, more than 11.9 million tonnes of CO2 emissions were displaced by renewable electricity generation in Scotland-equivalent to over a fifth of Scotland's total emissions<sup>5</sup>.

### **Scottish Planning Policy**

In all other areas outside of National Scenic Areas and National Parks, including those around Loch Ness and the Great Glen, the Scottish Planning System ensures that robust and adequate protection exists to balance the protection of landscapes and the need to decarbonise our energy system.

Any wind farm application must assess the potential impacts on natural heritage and the environment on a detailed case-by case basis, with the relevant authority determining if the application is suitable. Further, developments are steered to the right locations using spatial frameworks as well as a range of development management considerations.

### **Local Development Plan and Special Landscape Area**

Paragraph 196 of SPP states that international, national and locally designated areas and sites should be identified and afforded the appropriate level of protection in Development Plans. In accordance this, the Highland Council have already developed a proposed Local Development Plan (LDP) for the Inner Moray Firth. The plan was developed with various public consultations followed by the production of a Main Issues report which was then independently scrutinised by a Scottish Government appointed Reporter.

The plan proposes a number of Special Landscape Areas (SLA) including Loch Ness and the Great Glen. SLAs are identified as regionally viable landscapes, and are intended to protect and enhance unique and important landscape qualities and to encourage the enjoyment of these areas. The potential effects of developments on the area (including wind farms) is considered for proposals situated both within and outwith the designated SLA to ensure that qualities and amenity of the SLA are protected.

Once adopted, the LDP will sit alongside the Highland-wide LDP and new supplementary guidance for onshore wind which together will be used to determine planning applications for developments that may come forward in the Inner Moray Firth area, including Loch Ness and the Great Glen. Overall, full consideration has been given to natural resources and specifically landscape designations around Loch Ness and the Great Glen and appropriate levels of policy protection that should be afforded to them.

### **Tourism**

An Energy, Economy and Tourism Committee report confirmed that planning guidelines are in place to protect potential impacts on tourism and that there is no evidence to suggest the development of renewable projects has had any negative impact on tourism.

The Committee found that:

*“Whilst care always needs to be taken in terms of the planning process and decisions on the siting of individual projects in areas popular with tourists and in our more rural and remote rural areas, no witness has provided the Committee with robust, empirical evidence, as opposed to anecdotal comment and opinion, that tourism is being negatively affected by the development of renewable projects.”<sup>6</sup>*

### **Economic impact of proposal**

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<sup>4</sup> <http://www.snh.gov.uk/climate-change/>

<sup>5</sup> <http://www.scottishrenewables.com/news/scots-renewable-energy-displaces-million-tonnes-co/>

<sup>6</sup> <http://www.scottish.parliament.uk/parliamentarybusiness/CurrentCommittees/57013.aspx#tourism>

Designating the area as a National Scenic Area or World Heritage Site would have a significant impact on all types of development not just onshore wind but also other renewable and non-renewable technologies – we do not believe this petition considers the wider impacts of the proposal.

The UK Government has already indicated that it will close the Renewables Obligation for onshore wind one year earlier than planned. This decision has put around £3 billion of investment into Scotland and the 5,400 jobs that rely on the sector at risk.

The introduction of further top-down restrictions on onshore wind developments in Scotland could mean losing out on even more good quality developments which can benefit the local and national economy and environment. For instance, latest figures on the Community Benefit given by onshore wind project to local communities have shown that this is now at around £9 million a year.<sup>7</sup>

## **Conclusion**

It is only through a case by case approach that local authorities and the Scottish Government can consent the right developments in the right places. Scottish Renewables believe the tools are already in place to allow planning authorities do this and is not convinced of the case for the designation of all or some of Loch Ness and the Great Glen to be designated a National Scenic Area.

Summary of our key points:

- National planning policy has recently been refreshed and there is a clear approach set out for Planning Authorities to follow in terms of the preparation of Spatial Frameworks for onshore wind energy and wider development management in terms of planning policies.
- SPP is clear that statutory Development Plans have a clear role in identifying and affording an appropriate level of protection to designations including those for landscape resources.
- The Highland Council is well advance in having in place an up to date Development Plan which has been through extensive public consultation and public examination. It has identified an appropriate level of protection by means of a Special Landscape Area designation for Loch Ness and Great Glen.
- The Highland Council is supplementing its Development Plan position with detailed Supplementary Guidance, following the approach set out in SPP, which will provide further development management checks and balances to ensure that only appropriate development in the right places secures consent.

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<sup>7</sup> <http://www.scottishrenewables.com/news/wind-farm-community-cash-hits-88m-year-record-high/>