



The National Trust
for Scotland

RENEWABLE ENERGY DEVELOPMENTS POLICY

April 2003

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Approved by NTS Council 4 April 2003

This statement sets out the general policy of The National Trust for Scotland towards renewable energy at a national level and also towards proposals for renewable energy developments which affect its properties, or land over which it holds feudal superiorities or restrictive agreements, or the wider settings of such land. It is intended to provide information to developers concerning the Trust's objectives, and guidance for Trust Regional staff in responding to enquiries regarding development proposals. It was approved by the Trust's governing Council on 4 April 2003.

Background

The National Trust for Scotland is the conservation charity which protects and promotes Scotland's natural and cultural heritage for present and future generations to enjoy. Its statutory purposes, as laid down in its Acts of Parliament, can be paraphrased as:

1. To ensure the permanent conservation, through ownership or other means, of nationally important land, buildings and collections
2. To enable people to visit and enjoy the Trust's properties, to see and experience them in ways which are consistent with their conservation
3. To influence and persuade others by example to share and support the Trust's aims and work

The Trust is Scotland's largest voluntary conservation organisation, with some 254,000 members and 490 permanent staff. It owns or manages 128 properties, including almost 76,000 hectares of countryside. The Trust cares on behalf of the nation for a great diversity of properties, including mountains, coastlines, islands, woodlands, battlefields and historic sites, gardens, castles, mansions and cottages. Those properties where numbers are recorded welcome around 1.7 million visitors each year, and hundreds of thousands more visit its countryside properties unrecorded.

National Policy Context

The Trust is generally in favour of well-designed renewable energy developments in suitable locations. This is because burning fossil fuels (coal, gas, oil or peat) for transport, heating and electricity generation both depletes finite non-renewable resources and makes a major contribution to the emission of greenhouse gases. Greenhouse gas emissions exacerbate natural rates of climate change, which is already having impacts on Scotland's natural and cultural heritage. As a conservation organisation, the Trust therefore accepts that Scotland needs firstly to reduce its overall demand for energy, and secondly to source a greater proportion of the energy which it does use from renewable rather than conventional sources. Renewable energy developments can potentially demonstrate the sustainable use of natural resources without prejudicing socio-economic objectives. The Scottish Executive should take the lead by preparing a national locational strategy for renewable energy developments which ensures that critical natural and cultural assets are protected.

Energy Efficiency and Renewables at Trust Properties

The Trust has introduced energy efficiency measures and renewable energy developments at some of its own properties, and seeks further opportunities to demonstrate best practice in this field and to raise public awareness of the issues involved. For example, the new Visitor Centre at Glencoe in Lochaber has 250mm thick walls with recycled insulation material. It is heated by waste woodchips from local forests, a CO₂-

neutral process which will also provide hot water for the Trust's adjacent caravan site, although its electricity does come from the grid. The Trust pioneered the development of commercial wind power in partnership with the local community on Fair Isle in Shetland; most of the Isle's electricity now comes from two aerogenerators. The Trust is also considering options for a renewables scheme on the Isle of Canna in the Inner Hebrides.

Energy Efficiency

At a national level the main means of reducing fossil fuel consumption should be through energy efficiency measures, particularly in transport and heating which account for roughly 80% of Scotland's energy use, but also in electricity usage. The Scottish Executive should therefore show strong leadership in promoting energy efficiency and in supporting practical measures to reduce demand. The nature and location of renewable developments is a secondary issue. Any renewable development should actually displace fossil fuel consumption, rather than simply providing additional capacity for continually increasing energy demand. However, if demand does continue to rise it is preferable that this should be met from renewable sources.

Energy and Electricity

The majority of Scotland's energy demand is met by burning gas or oil for space heating and petrol or diesel for transport; the generation of electricity, whatever the source, meets only about 20% of the demand. More energy demand should be met locally and directly, including from district heating or combined heat and power plants, rather than by the wasteful long-distance transmission of electricity generated remotely, whether this is by fossil, nuclear, renewable or other means.

Wave, Tidal, Solar and Hydrogen Power

There is a need for greater research into and development of offshore wave and tidal power, biomass and solar technologies, and in the long term into the use of hydrogen power. There is also a need for greater research into the environmental impacts of these technologies, which are currently less well understood than those of the onshore wind or hydro schemes which currently form the focus of most development proposals.

Response To Development Proposals

All forms of energy generation have environmental impacts. Despite its support for renewable generation in principle, the Trust will therefore oppose developments with unacceptable impacts on the natural or cultural heritage in the terrestrial or marine environments, or will seek mitigation measures where it considers that these could improve a proposed development. Given the large numbers of proposals and the limited staff time available to assess them, the Trust will prioritise its involvement in casework to those which directly affect its properties or other interests or their settings, as it already does for all other types of development. The Trust will examine the Environmental Statement normally required for an energy proposal, and will use it to assess the proposal's impact on the heritage assets of its property. The issues which the Trust will consider when determining its response to specific proposals for new developments or for the expansion of existing ones are set out below.

Significance

The Trust prepares for each of its properties a Statement of Significance, setting out concisely which elements of that property are particularly important to Scotland's heritage. The Trust will use these Statements as the principal tool by which it will assess the potential impact of energy proposals upon its properties. This means that the Trust might be more likely to raise concerns about a proposed development adjacent to one of its properties if the significance of that property lies primarily in its landscape or wild land

qualities rather than, for example, its collections or its historical associations. In addition to the Statements of Significance the Trust also maintains tables of the key features of each property, and these too will be checked for any other aspects of the character of a property which might be affected by a proposed development.

Reversibility

All renewables developments should be designed so that they can be removed at the end of their lifespan. This should include all elements of the scheme, including any access tracks, turbine and building foundations and dams. The cost of doing this should be built into the development proposals, and its implementation ensured through the provision of a restoration bond. Only existing roads and tracks should be used wherever possible, and in fragile and remote areas construction should preferably be by helicopter, avoiding the need for new deep and wide access tracks.

Overall Environmental Costings

Each development proposal should be accompanied by a comprehensive assessment of its overall environmental and energy costs and benefits over its entire lifespan, to show conclusively that it actually generates net environmental benefits. For example, this should demonstrate that the CO₂ emissions which it saves substantially outweigh any loss of stores of carbon-rich vegetation and soils which it causes. Blanket bogs in particular, in places such as Lewis, Caithness and the central Highlands, have an internationally significant role as carbon stores.

Biodiversity

An assessment should be made of the development's impact on protected and other habitats and species, including bird roosting, nesting, feeding and migration sites and routes and fish breeding and migration sites and routes.

Visual Impact

The size, scale and design of developments, including associated buildings and power lines, should be assessed in the context of local topography. Particular attention should be given to any cumulative effects related to other renewables or any other developments. There is a distinction between the visibility of developments, which can be demonstrated objectively through computer modelling, and their visual impact, which introduces more subjective opinions. The impact can in some cases be partly reduced by the use of colour.

Landscape

A development's impact on the natural and cultural aspects of the landscape will vary greatly depending upon the character of the local landscape and its ability to accept development. This applies throughout Scotland, but in particular there should be a presumption against any large-scale development in landscapes designated in whole or part for their landscape quality, such as National Parks, National Scenic Areas (NSAs) their settings and green belts.

Wild Land

The Trust believes that Scotland's remote and wild landscapes are one of its finest but most neglected assets. Since its creation in the 1930s the Trust has promoted the cause of wild land conservation, partly through the acquisition and management of some of Scotland's most remote and wild land. The Trust's definition of wild land in Scotland is that it is relatively remote and inaccessible, not noticeably affected by contemporary

human activity, and offers high-quality opportunities to escape from the pressures of everyday living and to find physical and spiritual refreshment. Relative to less industrialised parts of the world, the extent of countryside in the UK unaffected or seemingly unaffected by overt human influence is very limited. Most such areas are in Scotland and are significant at the UK level, but also have some value in European terms. Outwith Scandinavia there are few large areas of wild land in Europe, particularly close to the industrial heartlands of mainland Europe. Hence Scotland's wild land is valued both by its own people and by visitors from elsewhere in the UK and abroad. It is valued both as a distinctive part of Scotland's heritage and identity and for the opportunities it provides for outdoor recreational experiences. Wild land is valued both by those who visit it and by many who have never experienced it first hand but still value its existence. It is an important motivation for many visitors to Scotland, and therefore of considerable socio-economic importance to the tourism industry.

Any kind of physical development has the potential to detract from wild land quality, including the turbines, buildings, dams and pylons which are features of most renewables developments. The construction of new access roads and tracks in particular can seriously diminish the remoteness which is one of the key hallmarks of wild land, by facilitating access on foot and by bike, in addition to their associated visual intrusion and physical damage. The Trust is therefore likely to oppose developments which detract from wild land quality, particularly in Scotland's relatively few large areas of core wild land. Further details are contained in the Trust's Wild Land Policy, which is available on request.

Historic Environment

The impact of any proposed development on the historic environment should be assessed; this includes for example archaeological sites and areas, Listed Buildings, Conservation Areas, historic designed and wider cultural landscapes and their settings.

Involvement of Local Communities

The Trust expects renewables developers to demonstrate exemplary consultation with local communities. The purpose of this is to give opportunities for local views to be expressed on the impacts of the proposed developments and to identify any local benefits which might accrue, such as direct financial payments, planning gain or improvements to local electricity supply.

Further Information

Additional information is available from:

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