

Response by the SLA to the Scottish Governments Consultation Draft Energy Strategy and Just Transition Plan: 9.05.2023

Chapter 1 – Introduction and Vision

1. What are your views on the vision set out for 2030 and 2045? Are there any changes you think should be made?

The European Landscape Convention (to which Scotland is a signatory through the UK) recognises that changes in the world economy are in many cases accelerating the transformation of landscapes. Forces for change are leading to competition for land, intensification of land use for renewable energy, agriculture, housing, commerce, woodlands, and coastal areas for aquaculture, transport infrastructure, and creating impacts on cultural landscapes.

- Scotland's Landscape Alliance (SLA) would like to see a more robust whole system approach in this strategy. There is a need to link society and the economy with environmental services, functions, and land uses, with an aim of generating mutually reinforcing feedback loops that lead to socially preferred outcomes. Ensuring a reduction in energy demand alongside a healthy climate, landscape and nature friendly energy system should be first priority.
- SLA believe there also should be a focus on reducing carbon emissions by (for example) providing appropriate locations in urban areas for renewable energy and heat generation technologies within public assets (parks /NHS estate/ University estates); decarbonising land management techniques; minimising the erosion of peat and other carbon rich soils; facilitating active travel; reducing the distances people need to travel for work and leisure; ameliorating micro climates in urban areas (and thereby reducing heating and cooling costs).
- Investing in landscape and landscape-led design solutions will help Scotland meet its renewable energy and climate targets whilst maintaining its reputation for quality food and drink and as a visitor destination driven by its landscape
- The SLA welcomes the reference in the vision to 'environmental ambitions', but note that it does not expressly reference 'nature'. As we currently are in a biodiversity loss and climate change crisis, we feel it's vital to address both in the strategy. Nature-based solutions for climate mitigation are acknowledged already by the Scottish Government to assist in climate change but without reference in the strategy to NBS it is likely that energy will take precedence over nature.
- Decisions on development, land use or land management should not result in net loss of landscape quality or biodiversity. In fact change can be used to enhance landscape quality, offset adverse impacts and deliver biodiversity net gain.

Chapter 2 – Preparing for a Just Energy Transition

2. What more can be done to deliver benefits from the transition to net zero for households and businesses across Scotland?

The SLA believe that putting communities at the heart of decision making processes is vital. Ensuring targets are set for new renewable energy projects to a meaningful level of local ownership. Adapting to a changing climate by building resilience and supporting production in a way that enhances our biodiversity and maximises the health, cultural and economic benefits for local communities.

Hagshaw Energy Cluster Development Framework is an example of good methodology and outcome

3. How can we ensure our approach to supporting community energy is inclusive and that the benefits flow to communities across Scotland?

Explore the practical actions that will secure diverse landscapes that represent the communities who live and work within them and which support a rich biodiversity while supporting climate resilient land use. Use key tools to pilot practical application within specific communities:-

- Land Use Strategy for Scotland;
- The Regional Land Use Pilot projects and Frameworks to highlight the practical ways to deliver an integrated approach to multi-functional land use and to enhance biodiversity and maximises the health, cultural and economic benefits for local communities.
- The 4th National Planning Framework
- Place into landscape – putting communities at the heart of the decision making process on land use decisions through practical application of The Place Principle

Ensuring guidance and targets set for wholly owned community energy developments as a minimum or a meaningful level of local ownership.

4. What barriers, if any, do you/your organisation experience in accessing finance to deliver net zero compatible investments?

5. What barriers, if any, can you foresee that would prevent you/your business/organisation from making the changes set out in this Strategy?

6. Where do you see the greatest market and supply chain opportunities from the energy transition, both domestically and on an international scale, and how can the Scottish Government best support these?

The development of skills in nature-based solutions which will be a critical part of tackling the climate and biodiversity crises and of reaching net-zero by 2045. There is a large opportunity locally and internationally in developing these skills as well as playing an important role if acknowledged more fully in the Strategy Nature-based solutions will influence the type, quantity and siting of many renewable energy developments both on land and in the marine environment and will be a key consideration when deciding land/sea use priorities.

Investment in skills and jobs associated with decommissioning and recycling content for new onshore and offshore wind turbines will ensure Scotland benefits from what will become a large-scale activity in Scotland and in so doing it will also reduce the carbon impact of this industry and help to safeguard materials for future use.

7. What more can be done to support the development of sustainable, high quality and local jobs opportunities across the breadth of Scotland as part of the energy transition?

Ensure experts within local authorities and National Park authorities are retained and invest in staff training to support better decision-making about communities and land use conflicts. Ensure funding, equitable pay and conditions to help retain committed land-based workers, rangers and community facilitators who manage and connect communities with landscape impacted by change.

Promote and support programmes that recognise, accredit and reward good practice in respect of design, delivery, management and use of landscape.

Include funding mechanisms that increase partnership working and community-led innovation in relation to rural landscapes impacted by land use change and help deliver quality outcomes.

Establish and utilise revenue budgets to properly resource the management of public landscape assets to address environmental challenges, deliver health and wellbeing services and resources to the community and individuals, and contribute to equitable inclusive growth.

Develop appropriate place/landscape-based policies, controls, incentives and support schemes to drive the delivery of a multifunctional approach to landscape by landowners and/or developers to meet climate change, biodiversity net gain, net zero carbon targets and help resolve land use conflicts

8. What further advice or support is required to help individuals of all ages and, in particular, individuals who are currently under-represented in the industry enter into or progress in green energy jobs?

Starting young - Emphasis on understanding the benefits and the careers available in green energy jobs including landscape, nature and biodiversity should be part of school and relevant higher education curricula.

Immediate investment in skills, upskilling for all ages into jobs associated with decommissioning and recycling content for new onshore and offshore wind turbines

Chapter 3 – Energy supply

The SLA are concerned that the strategy does not address the landscape or seascape impacts of renewable energy developments or how they should be mitigated.

Scotland's landscape provides the physical foundation for our lives and the places where we live, work, learn and play. Access to high quality landscape influences our health, wellbeing and livelihoods. Landscape plays a vital role in tackling the global issues of climate change and biodiversity loss that are already having a major impact on all our lives. Scotland's landscape is essential to our nation's economic success both directly, in terms of the natural capital which underpins many industries, and indirectly through its impact on quality of life which attracts people to live in, work in and visit Scotland. They are a key part of Scotland's rich, diverse and inspiring heritage and are of fundamental importance to Scotland's environment, society and economy. Land/seascape must be a key consideration in the expansion of all forms of renewable energy, no matter the technology, but particularly so wind energy, both on and offshore.

9. Should the Scottish Government set an increased ambition for offshore wind deployment in Scotland by 2030? If so, what level should the ambition be set at? Please explain your views.

There are no specific questions relating to onshore wind but with the deployment of onshore wind energy being so critical to delivery of the strategy and there being such enormous ambition for this sector we would also like the following comments to be applied to onshore wind development also.

To enable a meaningful response to this question the SLA believe there needs to be a Scottish Government analysis of what is required now, what will be needed in 2030 and 2045 based on both reducing energy demand and increasing energy efficiency whilst balancing environmental limits so that it is controlled rather than driven by the markets.

The SLA supports all forms of renewable energy generation to enable the rapid decarbonisation of energy production in Scotland, where it is the right technology, of the right scale, in the right location. We welcome the commitment to planning and environmental assessment and the need to address the nature crises as greater volumes of onshore wind energy are deployed, but believe this should be much more prominent in the Strategy. The SLA have called for in our High Level Statement 'Landscape an Place for Success' a statutory national plan and policy for Landscape, Land Use and Infrastructure to consider and design appropriately for large scale change to deliver on Scottish Government priorities for climate change, and loss of biodiversity.

We still advocate for this with such a large expansion of both on and offshore wind energy developments proposed and the infrastructure that will be required to support it, it is critical that this is guided by appropriate policy so that such developments are driven by what is feasible and desirable within existing environmental legislation and limits, rather than being left to the market to decide.

The Strategy lacks any reference to enhancing and protecting habitats, both in the marine environment and on land, that provide nature-based solutions to climate mitigation and adaptation.

Developments should not be located where they are projected to have significant negative impacts on Scotland's natural and cultural heritage, in particular elements designated for their national and international significance e.g. Special Protection Areas, Special Areas of Conservation, Marine Protected Areas, National Scenic Areas and Special Landscape Areas).

Cumulative impact on landscape/seascape; wildlife disturbance and environmental impact must be key considerations.

Where mitigation and compensation measures are proposed they must produce net positive, additional outcomes that adequately compensate for the impacts.

Peat, seabeds and specific marine ecosystems are important for their abilities to sequester and store carbon. It is important that these properties are recognised and accounted for when deciding on the overall ambition and location of new offshore wind developments or any renewable energy developments in peat or marine environment.

10. Should the Scottish Government set an ambition for offshore wind deployment in Scotland by 2045? If so, what level should the ambition be set at? Please explain your views.

Please see answer to Q9 in relation to analysis on energy demand and efficiency and land use conflicts, impacts on communities, landscape and biodiversity and net positive, additional outcomes that adequately compensate for any impacts.

11. Should the Scottish Government set an ambition for marine energy and, if so, what would be an appropriate ambition? Please explain your views.

Please see answer to Q9 in relation to analysis on energy demand and efficiency and land use conflicts, impacts on communities, landscape and biodiversity and net positive, additional outcomes that adequately compensate for any impacts.

12. What should be the priority actions for the Scottish Government and its agencies to build on the achievements to date of Scotland's wave and tidal energy sector?

Further support to ensure a balanced approach to renewables across Scotland with targets not only focussed on wind renewables

13. Do you agree the Scottish Government should set an ambition for solar deployment in Scotland? If so, what form should the ambition take, and what level should it be set at? Please explain your views.

Please see answer to Q9 in relation to analysis on energy demand and efficiency and land use conflicts, impacts on communities, landscape and biodiversity and net positive, additional outcomes that adequately compensate for any impacts.

14. In line with the growth ambitions set out in this Strategy, how can all the renewable energy sectors above maximise the economic and social benefits flowing to local communities?

Ensuring guidance and targets set for wholly owned community energy developments as a minimum or a meaningful level of local ownership. Community benefit should be standard as part of any consenting process.

15. Our ambition for at least 5 GW of hydrogen production by 2030 and 25 GW by 2045 in Scotland demonstrates the potential for this market. Given the rapid evolution of this sector, what steps should be taken to maximise delivery of this ambition?

16. What further government action is needed to drive the pace of renewable hydrogen development in Scotland?

Funding of further research into this sector

17. Do you think there are any actions required from Scottish Government to support or steer the appropriate development of bioenergy?

A statutory national plan and policy for Landscape, Land Use and Infrastructure to consider and design appropriately for large scale change to deliver on Scottish Government priorities for climate change, and loss of biodiversity.

The SLA believe that the use of land for bioenergy will have land use implications impacting on Scotland's agriculture and food security as well as limiting opportunities to allow for nature-based solutions to climate change and halt or reverse biodiversity loss.

18. What are the key areas for consideration that the Scottish Government should take into account in the development of a Bioenergy Action Plan?

Impacts on land use for agriculture/ food production/ nature-based solutions to climate change.

19. How can we identify and sustainably secure the materials required to build the necessary infrastructure to deliver the energy strategy?

Circular economy approach to procurement and development.

Investment in skills and jobs associated with decommissioning and recycling content for new onshore and offshore wind turbines

North Sea Oil and Gas

20. Should a rigorous Climate Compatibility Checkpoint (CCC) test be used as part of the process to determine whether or not to allow new oil and gas production? P98

No new exploration of oil and gas.

21. If you do think a CCC test should be applied to new production, should that test be applied both to exploration and to fields already consented but not yet in production, as proposed in the strategy?

No new exploration of oil and gas.

22. If you do not think a CCC test should be applied to new production, is this because your view is that:

- Further production should be allowed without any restrictions from a CCC test;
- No further production should be allowed [please set out why];
- Other reasons [please provide views].

23. If there is to be a rigorous CCC test, what criteria would you use within such a test? In particular [but please also write in any further proposed criteria or wider considerations]

- In the context of understanding the impact of oil and gas production in the specifically on the goals of the Paris Agreement, should a CCC test reflect –

A) the emissions impact from the production side of oil and gas activity only;

B) the emissions impact associated with both the production and consumption aspects of oil and gas activity (i.e. also cover the global emissions associated with the use of oil and gas, even if the fossil fuel is produced in the Scottish North Sea but exported so that use occurs in another country) – as proposed in the Strategy;

C) some other position [please describe].

- Should a CCC test take account of energy security of the rest of the UK or European partners as well as Scotland? If so, what factors would you include in the assessment, for example should this include the cost of alternative energy supplies?
- Should a CCC test assess the proposed project's innovation and decarbonisation plans to encourage a reduction in emissions from the extraction and production of oil and gas?
- In carrying out a CCC test , should oil be assessed separately to gas?

24. As part of decisions on any new production, do you think that an assessment should be made on whether a project demonstrates clear economic and social benefit to Scotland? If so, how should economic and social benefit be determined?

No - the Scottish Government has declared twin crises of biodiversity loss and climate change.

25. Should there be a presumption against new exploration for oil and gas? (*estimated to be only 20% of future production – 80% expected to come from existing sanctioned fields – Ernst and Young analysis North Sea Transition Authority*)

Yes - the Scottish Government has declared twin crises of biodiversity loss and climate change.

26. If you do think there should be a presumption against new exploration, are there any exceptional circumstances under which you consider that exploration could be permitted?

No

Chapter 4 Energy demand

Heat in Buildings

27. What further government action is needed to drive energy efficiency and zero emissions heat deployment across Scotland?

Investment in a multi-skilled green workforce

Creating further green incentives to encourage the drive for energy efficiency and zero emissions whilst enhancing biodiversity, community partnership working and multifunctionality in our landscapes.

Energy for transport

28. What changes to the energy system, if any, will be required to decarbonise transport?

Make active travel and public transport an easier, safer, more reliable and more cost-effective alternative to the private car. Alignment to NPF4 and the planning focus on 20 minute neighbourhoods and other place based emphasis that reduce the need for travel, especially by private car will all be key to achieving the target of reducing private car miles.

Support more urban based food growing initiatives to reduce food miles.

29. If further investment in the energy system is required to make the changes needed to support decarbonising the transport system in Scotland, how should this be paid for?

30. What can the Scottish Government do to increase the sustainable domestic production and use of low carbon fuels across all modes of transport?

31. What changes, if any, do you think should be made to the current regulations and processes to help make it easier for organisations to install charging Infrastructure and hydrogen/low carbon fuel refuelling infrastructure?

32. What action can the Scottish Government take to ensure that the transition to a net zero transport system supports those least able to pay?

Create incentives for communities such as extending free bus travel to other categories of traveller could be used to encourage greater use of the bus network rather than private car travel. Work with transport operators to increase appeal amongst older age groups and future car owners. Targeted action in disadvantaged communities to raise awareness of the global & local benefits of active travel.

33. What role, if any, is there for communities and community energy in contributing to the delivery of the transport transition to net zero and, what action can the Scottish Government take to support this activity?

Community partnership transport and energy hubs

34. Electric vehicle batteries typically still have around 80% of their capacity when they need replacing and can be used for other applications, for example they can be used as a clean alternative to diesel generators. What, if anything, could be done to increase the reuse of these batteries in the energy system?

Energy for agriculture

35. What are the key actions you would like to see the Scottish Government take in the next 5 years to support the agricultural sector to decarbonise energy use?

Develop a more multifunctional approach to the land that works for climate mitigation, nature and biodiversity as well as a whole system approach to food production

Support more urban based growing initiatives and greater access to land to new growers to enable reduced carbon footprint by reduced food miles and waste; less dairy and meat land take, sustainably produced reducing reliance on chemicals.

Assist the farming community to move away from its dependency on pesticides and fertilizers which will reduce green house gases and improve biodiversity

Energy for Industry

36. What are the key actions you would like to see the Scottish Government take in the next 5 years to support the development of CCUS in Scotland?

37. How can the Scottish Government and industry best work together to remove emissions from industry in Scotland?

Incentives to encourage every business/industry leader in Scotland to commit to utilise land holdings to support energy infrastructure and heat networks to store energy from ground and water heat sources well as investing in nature based solutions to mitigate the impacts of climate change.

38. What are the opportunities and challenges to CCUS deployment in Scotland?

39. Given Scotland's key CCUS resources, Scotland has the potential to work towards being at the centre of a European hub for the importation and storage of CO₂ from Europe. What are your views on this?

The SLA believes that CCUS requires further research. Working towards Scotland becoming a European hub for CCUS has the same risks as Scotland becoming a monoculture for offsetting carbon emissions as is currently happening with corporate buying up of land in Scotland purely to offset activities elsewhere around the globe and in doing this it removes the Community interest.

Chapter 5: Creating the conditions for a net zero energy system

40. What additional action could the Scottish Government or UK Government take to support security of supply in a net zero energy system?

41. What other actions should the Scottish Government (or others) undertake to ensure our energy system is resilient to the impacts of climate change?

As Scotland is also in a biodiversity loss and climate change crisis we need to tackle both together. Encouraging the delivery of nature based solutions and multifunctional, productive landscape and greenspace at scale to tackle climate & nature emergencies and deliver resilient and equitable results for all communities (environmental, social and economic benefits eg food, afforestation, economy, energy creation) and to build into a local sustainable supply.

Embed energy creation, storage and infrastructure in public spaces into local authority duties and into the planning system for private land.

<https://www.greenspacescotland.org.uk/Pages/Category/energy>

Demonstrate a positive vision of a Zero-Carbon Scotland by the use of success stories to incentivise communities. Collaborate at all scales and using a place based approach eg Climate Action Towns - Work with Key Agencies Group. Projects incremental to create the vision - funded / delivered by multiple groups.

Funding Mechanisms: Share evidence on success of different and new funding models: Living Labs, buy outs, public sector loans, wealth funds, Investment Bank. Align investment & budgets: Council land a community asset & can free up development.