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By email to: energystrategy@gov.scot

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Our ref:
Our case ID: 300019314

26 May 2017

Dear Ms Williamson

[Scottish Government – Scottish Energy Strategy and Onshore Wind Policy Statement](#)

Thank you for your consultation which we received on 27 January 2017 about the above and its Environmental Report (ER). We have reviewed these documents in relation to our main area of interest for the historic environment. The first part of this response relates to the Scottish Energy Strategy with part two focusing upon its environmental assessment.

Part 1: Scottish Government – draft Scottish Energy Strategy and draft Onshore Wind Policy Statement

We welcome the overall ambition set out in the Energy Strategy in setting out the choices faced for the future of Scotland's energy system. We welcome the links to the draft Climate Change Plan and the vision set out in the strategy to 2050. Our detailed comments on the draft Scottish Energy Strategy are set out in part 1A of the attached annex. Our response to the consultation on the accompanying Onshore Wind Policy Statement are set out in part 1B of the attached annex.

Part 2: Environmental Report

We consider that the assessment of predicted effects would have benefitted from a more robust approach to both the positive and negative effects of the draft Energy Strategy. There is the potential for positive and negative effects across all sectors identified in the plan and a number of these issues have been raised in our response to the draft strategy in part 1 of the attached annex to this response. Our detailed comments on the part of the Environmental Report relating to the draft Energy Strategy are set out in part 2 of the attached annex.

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



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None of the comments contained in this letter constitute a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of our commitment to capacity building in SEA.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Adele Shaw who can be contacted by phone on 0131 668 8758 or by email on adele.shaw@hes.scot.

Yours sincerely

Historic Environment Scotland

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

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Annex

Part 1: Scottish Energy strategy - The future of Energy in Scotland and Onshore Wind Policy Statement

For ease of reference where we have comments to make, we have followed the headings set out in the draft documents under the relevant headings.

1A. Scottish Energy Strategy

We welcome the Scottish Government's vision as set out in the draft Scottish Energy Strategy and the proposal to implement a new 2030 'all-energy' renewables target of delivering the equivalent of 50% of Scotland's heat, transport and electricity consumption from renewable energy sources. We have the following comments to make on some of the consultation questions included in the draft policy statement.

Meeting our supply needs

What are your views on the actions for Scottish Government set out in Chapter 3 regarding energy supply? In answering, please consider whether the actions are both necessary and sufficient for delivering our vision.

We note and welcome recognition of the role of the land use and marine planning systems in ensuring that a strategic approach is taken to delivering both on and offshore energy developments. We note the actions listed in relation to the role planning has to play in delivering the future energy system, there is significant potential to tie the aims of the Energy Strategy in to those of the review of the Scottish planning system. This could include a revised National Planning Framework, supported by an updated Scottish Planning Policy and potential suite of a national policies shared between the Scottish Government and the Key Agencies.

Whilst we welcome the Scottish Government's commitment to supporting the continued growth of the renewable energy sector and onshore wind technology in particular, we do have concerns about the potential impact of ever larger wind turbines on Scotland's historic environment. Turbines of increasing heights have the potential to have a significant impact by dominating these assets due to their scale and impacting on our ability to understand and appreciate them in their settings. We recommend that the Scottish Government ensures that the planning system retains sufficient flexibility to direct the right development to the right location whilst supporting the ongoing delivery of onshore wind energy developments and of the cross-cutting aims of the historic environment strategy for Scotland, Our Place in Time. In addition, we would be happy to continue to work with the Scottish Government, Heads of Planning Scotland and other statutory consultees including Scottish Natural Heritage and the Scottish Environmental Protection Agency to provide further advice on these issues. We have provided more



detailed comments on the matters in our response to the consultation on the accompanying Onshore Wind Policy Statement below.

Transforming Scotland's energy use

What are your views on the actions for Scottish Government set out in Chapter 4 regarding transforming energy use?

We note the Scottish Government's commitment to the Scottish Energy Efficiency Programme (SEEP). We have provided some high-level comments on this programme as part of our response to the draft Climate Change Plan and will be responding in detail to the consultation on the options for programme and policy for the design and operation of SEEP.

What ideas do you have about what energy efficiency target we should set for Scotland, and how it should be measured? In answering, please consider the EU ambition to implement an energy efficiency target of 30% by 2030 across the EU.

Whilst we note the EU ambition in relation to energy efficiency targets as set out on page 55 of the draft Energy Strategy, we would reiterate the advice provided to the Scottish Government in relation to the draft Climate Change Plan. That is that in seeking to alter the appearance of listed buildings, buildings within Conservation Areas and other types of traditional buildings may harm their special interest. In light of that it is important to seek options for improving energy efficiency without detriment to the historic environment. As noted above, we are providing detailed comments on the consultation on SEEP which accompanies this draft Energy Strategy and we would be happy to provide further advice for our historic environment interests as a detailed policy is developed.

1B. Onshore Wind Policy

We welcome the confirmation of the Scottish Government's position on the deployment of onshore wind in the draft policy statement. We also welcome the reiteration of the Scottish Government's position that this technology will be supported where they are appropriately sited so that the environment, including the historic environment, is protected. We note the consultation questions included in the draft policy statement and have the following comments to offer.

Route to market

What is your view on the appropriate approach for the inclusion of wind farm efficiency as a material consideration in the Section 36 consents guidance?

We welcome the recognition of the role of the planning system in guiding onshore wind developments to appropriate locations. We note the proposals for the including the consideration of wind farm efficiency as a material consideration for wind farms being



determined under section 36 of the Electricity Act. We welcome the statement that applications should continue to be assessed on their own merits. As noted in the consultation document, the Scottish Government should be satisfied that there are no unintended consequences of this action. We would be happy to provide further advice as work in this area progresses.

In this chapter, the Scottish Government has identified three areas of activity where it can offer support to a route to market for onshore wind – do you agree with the issues identified?

We note the summary of issues identified in the Everose Report included in the consultation document and the requests it makes of the Scottish Government in relation to the planning and consenting system. In particular, we note the call for planning guidance on the topic of how larger wind turbines could be accommodated. As noted in our response to the draft Scottish Energy Strategy, above, these turbines have the potential to have a significant impact on heritage assets and their setting. Historic Environment Scotland has guidance in place to assist developers to plan their projects through our [Managing Change in the Historic Environment](#) series. We will also seek opportunities to work with other statutory consultees including Scottish Natural Heritage, the Scottish Environmental Protection Agency and the Forestry Commission Scotland to produce joined up advice and guidance to competent authorities and the renewables sector on issues where our respective statutory interests meet.

Repowering

Do you agree with the Scottish Government's proposed approach to repowering?

We welcome confirmation of the Scottish Government's support for the repowering of existing wind farm sites. However, there would appear to be a disconnect between the position advocated in the draft policy statement that proposals for the repowering of wind farms sites are not to be treated differently from a new application and the Scottish Government's policy position set out in Scottish Planning Policy (SPP) at paragraph 170. SPP states that wind farm sites should be capable of use in perpetuity in planning decisions. It would be helpful if guidance were provided on this issue to ensure that the Scottish Government's policy and position underpinning the approach to repowering is clearly defined.

Developing a strategic approach to new development

Do you agree or disagree with the proposals to pursue option 3, a 'locally co-ordinated approach'? Please provide reasons to support your answer.

Whilst we consider that for our interests the existing system of consenting applications is robust, we agree that a locally co-ordinated approach to new development would be a means of linking planning for energy needs with community planning. There are already



some examples of this work taking place such as the project which Local Energy Scotland (LES) is under taking to support local involvement in planning for renewable energy. We will be working with LES as they develop a pilot project based on the development and implementation of local energy plans for four communities within the Highlands and Islands area. However, given that such work is at a relatively early stage, the links between community or locality planning and energy specific plans and the relevant Local Development Plan should be clarified.

We note references to the Land Use Strategy as a means of seeking to balance competing interests at an early stage. We support and have provided input to the development of the Land Use Strategy. We are broadly supportive of its use as a way of mediating competing interest. However, we consider that the mechanisms involved are likely to require further consideration. For example it will be important to involve communities, both of interest as well as place, in planning for their energy developments.

Part 2: Environmental Report

This response addresses the section of the Strategic Environmental Assessment (SEA) Environmental Report (ER) which relates to the draft Energy Strategy.

I have used the consultation questions set out on page 84 to provide comments on the ER to structure this response.

Accuracy and Scope of Baseline Information

I note the environmental protection objectives for the historic environment as set out in section 9 of the ER on pages 102 – 104. I am content that it forms an accurate account of relevant legislation and policy. However, Historic Environment Scotland has published a range of guidance which will help to ensure that a number of policy areas identified in the draft Energy Strategy can be implemented without detriment to the historic environment. Our Managing Change in the Historic Environment series of guidance notes will be helpful in identifying best practice and understanding the application of policy principles set out in Scottish Planning Policy to assist with the mitigation of impacts at project stage.

Predicted Environmental Effects

We welcome recognition of the potential for actions relating to the new target for generating electricity from renewable sources, particularly the potential for larger onshore wind turbines to have new effects on heritage assets and their setting. We also note that the potential for retrofitting energy efficiency measures to traditional or historic buildings may have an impact on cultural heritage. There is the potential for this to be detrimental if works are not in keeping with their character or special interest although we note that this does not appear to have been considered as potentially negative in the tables on pages 212 and 213.

Assessment findings, monitoring and mitigation proposals



Whilst we welcome the policies and proposals set out in the draft plan, the findings of the assessment would have benefitted from a more nuanced assessment to its potential negative and positive impacts. That said, I welcome recognition in paragraph 6.4.28 that the installation of energy efficiency measures have the potential to have an adverse impact on traditional buildings and their character. These aspects should be drawn out in the final Energy Strategy and opportunities to address these issues should be identified.

Turning to mitigation, I note and agree with the conclusion that many of the effects identified in the draft strategy will be mitigated through existing mechanisms such as appropriate siting and design of projects. On this basis, it will be important for the final strategy to recognise that impacts arising from sectors including electricity on the historic environment will also require to be addressed as part of relevant decision-making processes including Environmental Impact Assessment.

Historic Environment Scotland
26 May 2017