

Energy & Wild Land Policy

Adopted by Trustees on 8th September, 2013

The John Muir Trust will apply this Policy when responding to strategic policy issues.

This Policy will be applied with reference to the John Muir Trust's Wild Land Policy (2010) and the Trust's Built Development Policy (2013).

INTRODUCTION

The Trust's object is to conserve and protect wild places with their indigenous animals, plants and soils for the benefit of present and future generations.

Inappropriate developments on wild land, including energy developments and associated infrastructure, are a major threat to the UK's remaining wild land.

There is no figure for how the landscape has changed at a UK level in recent years but data from a government agency, Scottish Natural Heritage (SNH), indicate an alarming trend, showing a rapid decline in the amount of land unaffected visually by built development.¹ SNH identify that the most significant cause of the decline over recent years is wind farms - a consequence of their proliferation, prominence, extensive visibility and siting in rural locations where there is little or no previous development. Wind turbines could be seen from about 20% of Scotland in 2008 but, in 2010, 35.6% of Scotland was visually affected.

The adverse impact of energy developments on the landscape and ecological health of the UK's last wild land is to such an extent that many core areas of wild land are at imminent risk of disappearing². This means it is vital that decisions on energy are evidence-based and that they use a holistic approach - encompassing social and environmental, as well as economic, factors considering local, national and international levels.

Wild land gives us clean air, water and food. It is home to valuable and spectacular wildlife, sustains local economies and it is where we can go to recharge our batteries. Crucially - in its natural, healthy state - wild land helps to offset the impacts of climate change, for example by minimising flooding and retaining carbon in healthy peat bogs and so reducing greenhouse gas (GHG) emissions. In weighing up competing costs and benefits, it should, however, also be recognised that wild land has an intrinsic value over and above its economic use to people.

The Trust takes a view on strategic energy policy because it is currently a major driver of the deterioration in the quality and extent of wild land in the UK. Current planning policy and designated areas legislation is not effective in protecting it.

¹ Scottish Natural Heritage Natural Heritage Indicator N3, May 2013 <http://www.snh.gov.uk/publications-data-and-research/our-changing-environment/scotlands-indicators/natural-heritage-indicators/>

² SNH advice letter (18.09.12) on Stronelairg wind farm: "If the Stronelairg proposal were to be consented, this SAWL" (Search Area for Wild Land) "would be eroded to the degree that it would not continue to merit recognition nor be valued as one of the wildest areas of Scotland".

SCOPE OF POLICY

Energy is a complex policy area. The Trust's policy is primarily concerned with devolved and reserved UK policy, but it also has relevance to European and international policy. Although the Trust's focus is on wild land (see Wild Land Policy) there is currently no agreed UK definition of "wild land". This policy therefore applies to all areas characterised by high natural scenic and wildlife value where there is minimal evidence of modern human development.

Energy is currently a very active area of public policy and the Trust will keep this statement under review as new technologies, evidence and legislation emerge.

JOHN MUIR TRUST POSITION

Climate change, energy policy and greenhouse gas emissions reduction

The Trust is committed to policy principles that support the current targets of the UK Government and devolved governments for GHG emissions reduction, as these are the primary public policy tools directed at climate change mitigation.

Climate change is adversely affecting biodiversity and society and it is essential that effective measures are put in place to protect nature and people, through both climate mitigation and adaptation.

Measures to impact climate change through GHG emissions reduction need to deliver measurable, cost-effective outcomes.

Land based, natural solutions have a significant role to play in climate change mitigation and adaptation, notably the conservation and restoration of peatlands and native woodlands. The Trust has a presumption against the siting of energy developments on these habitats or other habitats of high wildlife and carbon value. For more detail on exceptions, see the Trust's Built Development Policy.

Prioritisation of energy technologies

The Trust supports the use of the "Energy Hierarchy" decision-making process.³ This methodology helps to identify the most economical, efficient and environmental approach to energy provision. It classifies and prioritises energy options, to assist progress towards a more sustainable energy system. The highest priorities include the prevention of unnecessary energy usage through eliminating energy waste and improving energy efficiency. The sustainable production of energy resources is the next priority. Depletive and waste-producing energy generation options are the lowest priority.

Energy Developments & Wild Land

The Trust does not support the construction of industrial-scale wind energy developments on wild land or developments that would impact adversely on wild land.

Industrial-scale built developments, including renewable energy schemes, are best located on brownfield sites reasonably close to areas of population demand. For exceptions to this principle, see the Trust's Built Development Policy.

In areas near wild land, the John Muir Trust is in favour of the development of sensitively-sited, community-scale renewable energy schemes which demonstrate that renewable energy may be produced without significantly

³ Institute of Mechanical Engineers <http://www.imeche.org/knowledge/policy/energy/policy/the-energy-hierarchy>

affecting wild land and are reasonably adjacent to existing settlements. “Community-scale”, in this context, generally means energy production equivalent to the approximate needs of the local community.

It is not appropriate for a scheme proposed on core wild land of national importance, or one which will impinge significantly on wild land, to proceed simply because it would bring a financial benefit to the local community. In other words, a scheme which is an industrial-scale proposal on a sensitive landscape is not made acceptable by there being a significant community financial interest in the development. The Trust supports the development of renewable energy systems where they can be shown to deliver - in return for the cost to the consumer and the public purse - measurable, cost-effective policy outcomes without major adverse environmental impacts.

PRINCIPLES WHICH THE TRUST ADVOCATES FOR STRATEGIC ENERGY POLICY

Energy policies at the UK and devolved government level are major drivers of adverse impacts on wild land and our landscapes more generally. This Trust Policy covers energy production, use and transmission. The John Muir Trust advocates that the following principles should be applied to UK and devolved energy policies:

- The Energy Hierarchy approach to decision making should be used, whereby energy conservation is prioritised.
- Energy related policies should follow Sustainable Development principles, using the definition agreed by UK governments⁴. Accordingly, energy production methods should be sustainable - environmentally, economically and socially (the three “pillars of sustainability”).
- The EU Strategic Environmental Assessment (SEA) Directive has been implemented through-out the UK. Public bodies and some private companies operating in a public character are required to undertake an SEA in order to assess, consult on and monitor the likely impacts on the environment of their plans, programmes and strategies. The SEA is a key component of sustainable development and should provide the public with opportunities to participate in decision-making. An adequate use of the SEA is a critical part of ensuring that a national energy strategy is properly assessed. The planned expansion of the UK transmission network is one area where this is essential.
- Energy policy should encourage demand-led energy production rather than a system which leads to excessive supply.
- In order to minimise ‘future uncertainty’ risk, over reliance on one particular technology alone should be avoided. Also, technologies should be used that are appropriate to the local circumstance. Public subsidies should be directed more towards energy conservation measures as they are currently far more cost-effective than subsidising increased renewable energy generation.
- UK and devolved **National Energy Commissions (NECs)** should be set up -

NECs would be composed of appropriate engineering, economic and other relevant experts, independent of commercial and other vested interests. The Commissions would examine the technical, economic, social and environmental aspects of current UK and devolved energy policy, and apply the Total Systems Cost approach when considering the viability of new energy production and transmission schemes. A **Total Systems** approach to cost/benefit analysis for energy installations would take account of all the costs involved in generating energy and getting it delivered to the consumer, including costs for extra transmission lines; substations; systems balancing; and impacts on carbon sequestering soil.

⁴ <http://sd.defra.gov.uk/what/principles/>

- The NECs would provide advice to governments on strategic energy issues eg: energy requirements; conservation and demand management measures; the costs and benefits of different energy mixes, including renewable as well as non-renewable generation. They would ensure that the heat and transport sectors were considered alongside the domestic electricity sector when looking at energy needs and GHG emissions reduction, in order to achieve holistic decision-making. They would also be responsible for monitoring final government decisions – such as on the siting of major energy infrastructure –to ensure decisions took into account direct and indirect social and environmental impacts, from a national as well as a local perspective.
- Current energy policies are leading the UK and devolved nations into a European-linked system. The evidence that this will provide the most secure and efficient energy system appears to be limited and there are potentially significant risks from the UK's current over-reliance on a centralised approach and a predominance of one technology. There should be a much greater emphasis on a decentralised approach, using local supply to satisfy local energy requirements, wherever possible. Increasing centralisation carries the risk of major "Security of Supply" failure.
- A "community-based" approach to energy conservation and production can deliver multiple benefits and should be promoted, particularly in and around sensitive landscape or natural heritage areas. Such an approach entails considering the energy needs of a defined geographical community and how they might best be provided. A decentralised assessment of the energy profile of an area should be used in order to devise an energy solution appropriate to that community. The community's energy needs should be looked at in the round, including energy conservation. This would not be based on maximising financial return through dependence on a subsidy regime (which carries the risk that this regime may change). Where possible, the Trust will work with communities in wild land areas to help determine local energy opportunities, within these principles.
- Research and Development funding should be prioritised towards projects which have the potential to bring forward more efficient energy saving or energy production technologies which can be utilised effectively throughout the world, such as the next generation of more efficient, renewable energy technologies.
- There needs to be an awareness in government policy decision-making that satisfying UK energy demand does not need to compromise our valuable areas of wild land.

HOW THIS POLICY WILL BE APPLIED

The John Muir Trust will apply this Policy when responding to strategic policy issues.

It will be applied in conjunction with the Trust's Wild Land Policy (2010) and Built Development Policy (2013).

Decisions on individual planning applications will be taken with primary reference to the Trust's Built Development Policy, but also taking into account this Energy and Wild Land Policy and the Wild Land Policy.