

Highland Renewable Energy Strategy

Response of the Community Woodlands Association

The Community Woodlands Association welcomes the production of a Highland Renewable Energy Strategy, and is pleased to have the opportunity to comment on the draft for consultation.

General Comments

Highland has a significant role to play in mitigating climate change: as the draft strategy notes, the region has abundant renewable resources from a number of sources: hydro, biomass, wind, tidal and wave, but also has significantly higher than average energy consumption. A clear strategic vision for the region, addressing the whole range of energy use, supply and efficiency issues, and demonstrating wherever possible, positive benefits to local communities, is therefore essential.

We are however, concerned that the balance of this consultation document (and the accompanying Renewable Energy Resource Assessment) is to present onshore wind as the key technology underpinning the production of renewable energy in the Highlands, and represents not a Renewable Energy Strategy, merely an Onshore Windfarm Location Strategy. Whilst such a strategy is undoubtedly required, given the present glut of potential applications for onshore windfarms, unfortunately, this document is inadequate even for this task.

Specific Comments

1. There is insufficient consideration given to measures to reduce energy demand, either by increased efficiency, or by reducing transmission losses through the adoption of CHP.
2. The consideration of biomass in the Strategic Renewable Energy Resource Assessment is derisory – after 50 pages of wind and wave, biomass from crops and woodfuel is covered in a few lines, with no explanation of the parameters used. We consider these underestimate the potential for crop biomass.
3. Notwithstanding this, it is clear from Table 4.1.1 “Levels of Energy Production” that biomass could make a significant contribution to the region’s renewable energy production, and through adoption of CHP, an even greater contribution to reducing CO2 emissions.
4. We would also argue that renewable energy production from woodfuel presents greater opportunities for community ownership, development and employment.

5. The selection of preferred development areas identified in the HRES bears little relation to that in Strategic Renewable Energy Resource Assessment- in the latter, nearly 50% of the potential under a highly constrained scenario was in Ardnamurchan and Morvern – yet this is not one of the 10 preferred areas, and is only identified as “secondary”
6. The Draft Renewable Energy Planning Guidelines state: “if the project is classed as major or national, then the proposed minimum distance for separation will be 1km, and there will be a presumption against development where this cannot be achieved” (p50), and also propose a minimum 1x turbine height safety distance from roads and railways (p51). These seem eminently sensible restrictions, which have been completely ignored in selecting the preferred, primary and secondary development areas. We note, for example, that in Caithness, the villages of Lybster and Clyth are identified as “preferred” development areas, much of Thurso and Scrabster Harbour as “primary” development areas, and John O Groats and Wick Airport as “secondary” development areas.
7. A significant proportion of those grid squares identified as preferred, primary or secondary, which are not inhabited or bisected by roads are currently woodland. The Draft Planning Guidelines state: “Schemes which require cutting down of native woodlands will require compensatory new tree planting” (p49) We do not consider this to be adequate protection for our native woodlands. Whilst commercial plantations may not be as sensitive, it still seems rather ironic to be clearing one source of renewable energy to make way for another.