



Electricity transmission charging: assessment of options for change

The RSPB welcomes this opportunity to comment on Ofgem's proposals for changes to electricity transmission charging. This response sets out our overall position on renewable energy, in particular the need to ensure that growth in the sector is truly sustainable, and highlights our key concerns regarding the proposals in Project TransmiT.

We have focussed our response on Questions 1 and 2 (Chapter 4) and Question 1 (Chapter 5) in the consultation paper.

Summary

We broadly welcome the aims of TransmiT in trying to facilitate a timely move to a low carbon energy sector. However, where changes to transmission charging are likely to make development more attractive it is imperative that precautions are in place to ensure that the most important places for wildlife are protected throughout the transition to a low-carbon economy. **Before changes are made to the charging system these remote and ecologically sensitive regions must be identified and an assessment made of the level of investment in renewable energy that can be made without negative ecological impacts.** This assessment must be accompanied by spatial guidance for developers and planning authorities. We would be happy to discuss our concerns in detail.

The RSPB and the energy sector

Climate change is already affecting birds and wildlife in the UK and globally, and it threatens to drive future biodiversity loss unless urgent action is taken to reduce emissions and keep the world within 'safe' levels of climate change. One study published in *Nature* indicates that climate change could cause up to 35% of species to be committed to extinction by 2050¹, and a recent paper from the Centre for Ecology and Conservation at The University of Exeter has shown that the documented impacts on species attributable to climate change are following the predicted effects, supporting the assertion that human-induced climate change is a major threat to global biodiversity². The RSPB therefore strongly supports the UK's greenhouse gas reduction targets and recognises the critical role that renewable energy will play in delivering them as part of a wider package that prioritises energy savings.

The huge amount of new infrastructure needed to decarbonise our energy supply can, however, have a detrimental impact on wildlife in the UK if poorly located and/or designed. For example, schemes such as the Severn Barrage would have devastating impacts on wildlife. Similarly, badly sited wind farms can be devastating for wild bird populations. We believe that we can, and must, decarbonise energy without harming species and our most important places for wildlife.

The RSPB is unusual amongst UK NGOs because we engage with individual applications for renewable and other energy infrastructure across the UK, advising developers how they can minimise the impact of their developments, as well as working with Westminster and devolved Governments to develop legislation and policy. This gives us an almost unique perspective into the implications of new policy for development on the ground.

¹Thomas et al. (2004) *Extinction risk from climate change* Nature 427 pp.145-148

² Ilya M. D. Maclean¹ and Robert J. Wilson (2011) *Recent ecological responses to climate change support predictions of high extinction risk* Proceedings of the National Academy of Sciences of the United States of America

Consultation Questions

Chapter: Four

Question 1: *Do respondents consider that we have appropriately identified and where possible quantified the impacts of the Project TransmiT options?*

No.

Question 2: *Do respondents consider that there are additional impacts which we should take into account in the decision making process and, if so, what are these?*

Under both options for change there is a predicted geographic shift of onshore wind to northern Scotland. The potential for impacts on biodiversity and, in particular, on designated sites must be considered as part of the wider sustainability assessment. We expand on this in the answer to Question 1 (chapter Five) below.

Question 3: *Do respondents consider that we have appropriately identified the potential interactions of the Project TransmiT options?*

No comment.

Question 4: *Do respondents consider that we have appropriately identified the likely impacts and consequences of these interactions?*

No comment.

Chapter: Five

Question 1: *Do respondents consider that we have appropriately identified and taken into account the key sustainability issues?*

We wish to draw attention to the following statement from Ofgem:

Beyond the climate change agenda, the gas and electricity industries affect the environment through other emissions and their impacts on our countryside and communities. We are committed to working with all stakeholders to ensure that we take these wider considerations into account in all of our decisions³.

Whilst it is welcome that TransmiT considers the impacts of all scenarios on meeting the UK's targets for renewable generation – and indeed that all charging approaches set out would appear to meet the 2020 renewable energy target – it is worrying that the definition of sustainability in this consultation appears restricted to assessing whether or not the options in TransmiT will contribute to meeting this target. The consultation fails to address wider issues of sustainability, such as the potential impact of the TransmiT options on biodiversity. This must be addressed.

Under both options - Improved ICRP and Socialisation - there is a predicted geographic shift in the location of onshore wind towards northern Scotland. This overlaps with some of the UK's most sensitive wildlife sites, many which are found in the north and west Highlands of Scotland⁴.

³ <http://www.ofgem.gov.uk/Sustainability/Pages/Sustain.aspx>

⁴ See the 'Bird sensitivity map' at <http://www.rspb.org.uk/ourwork/policy/windfarms/locationguidance/scottish.aspx> The map indicates that there is a greater incidence of bird sensitivities in north-west Scotland. Particularly sensitive areas occur in the Highlands, Western Isles and Northern Isles.

Whilst some level of development may be accommodated even on the most sensitive of sites, the current lack of strategic approach to renewables across the UK means that some of our most valuable natural heritage sites are already under pressure from badly sited or inappropriately sized renewable energy developments. Information available on site sensitivity has not proven sufficient to deter some developers from bringing forward proposals for development in these areas, such as, for example, the proposal to build the Lewis Wind Farm on a European designated site⁵. This places a burden not only on environmental bodies by necessitating objections to the most damaging developments, but also on Government and local authorities which have a responsibility to protect biodiversity throughout the transition to low-carbon energy generation. This burden could be significantly reduced through better national strategic planning for renewables which would guide developers to areas of least sensitivity.

We are concerned that the pressures outlined above could be exacerbated by the options proposed in TransmiT due to the current lack of national strategic planning for renewables. Appropriate safeguards must therefore be put in place to ensure that additional incentives to develop in more remote locations such as the north and west of Scotland do not conflict with protection of the UK's most valuable natural heritage sites. Before changes are made to the charging system these remote and ecologically sensitive regions must be identified and an assessment made of the level of investment that can be made without negative ecological impacts. This assessment must be accompanied by spatial guidance for developers and planning authorities. We would be happy to discuss this in further detail.

***Question 2:** Do you think there may be long term and strategic benefits associated with the development of HVDC technology, in particular the treatment of converter station costs for links that parallel the AC network, which Project TransmiT modelling has not fully considered because of the timeframe of the modelling (i.e. 2030) and the limited nature of the bootstrap options?*

No comment.

***Question 3:** Do you have any supporting evidence for a different treatment of the converter station costs for the planned bootstrap HVDC options?*

No comment.

For further information please contact:

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See also the 'Strategic location guidance for onshore windfarms: Map 5 – Zones of natural heritage sensitivity at http://www.snh.gov.uk/policy-and-guidance/policy-documents/document/?category_code=Policy&topic_id=1122

⁵ <http://www.rspb.org.uk/supporting/campaigns/lewis/>