



nature's voice

Grant McEachran
Ofgem
107 West Regent St
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RSPB SCOTLAND

20th March 2012

Dear Mr McEachran

RIIO-T1: Initial Proposals for SP Transmission Ltd and Scottish Hydro Electric Transmission Ltd

We welcome the opportunity to respond to the above consultation.

RSPB Scotland has been engaged in the development of SHETL's business plan '*Keeping the lights on and supporting growth*' and as such we restrict our comments to SHETL's activities. We broadly support the key objectives for the next decade as set out in SHETL's January 2012 update, particularly the delivery of a green energy supply for Scotland in line with ambitions to minimise the environmental impact of SHETL's activities.

RSPB and the energy sector

The RSPB views climate change as the single greatest threat facing people and wildlife and as such we support the widespread deployment of renewables in line with Scotland's ambitious renewable energy targets, with priority placed on energy efficiency and demand reduction. However, it is vital that this is done sensitively and sustainably so that developments are delivered in the right places, meeting the urgent need to reduce greenhouse gas emissions and tackle climate change without damaging Scotland's most important places for wildlife. We recognise that in order to deliver the required level of renewables, we need considerable expansion and strengthening of the grid network to accommodate increased flows of renewable energy. Therefore, we warmly welcome commitments to undertake this in an environmentally sensitive manner.

It is important the grid is planned strategically to ensure the successful deployment of renewables both on- and off-shore. However, this must not be to the detriment of Scotland sensitive natural environment and strategic plans should guide development away from sensitive sites for wildlife wherever possible.

Looking after the environment

We work closely with renewable energy developers and grid operators to provide advice on the suitability of development sites before planning or energy consent applications are made. Early engagement allows us to flag up potentially sensitive sites and steer development away from areas of potential risk, and we would hope to be consulted at an early stage in the planning of grid upgrades or new grid infrastructure in order to minimise any potential conflict with the natural environment. This can help the design of

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developments early on, minimising environmental harm and helping avoid delays in decision making. We recommend that SHETL consult RSPB's *Bird Sensitivity Map*¹ when planning future grid developments. This identifies those areas where wind farms are more likely to pose a medium to high risk to important bird populations in Scotland and is also likely to be helpful in planning for new grid infrastructure.

As a landowner, we have some experience of dealing with SHETL in relation to assets sited or planned on our land. We had some recent concerns regarding the environmental impacts of grid infrastructure works planned to cross our Abernethy, Insh Marshes and Corrimony reserves but pre-application engagement with SHETL has been productive and we are optimistic that any residual issues can be resolved successfully. We welcome such early and effective consultation with developers wherever possible, particularly where work may affect our reserve or land holdings. Detailed information on RSPB reserves boundaries is available for use in geographic information systems and information is on our website². We urge SHETL to contact us as early as possible where it appears that proposed grid infrastructure may cross or otherwise affect an RSPB reserve.

I hope our comments are of assistance. Please do not hesitate to contact me if you have any further questions.

Yours sincerely,



Kelsie Pettit
Conservation Policy Officer (Energy and Climate)

¹ <http://www.rspb.org.uk/ourwork/policy/windfarms/map.aspx>

² <http://www.rspb.org.uk/ourwork/gis/about.aspx>