

Nature Division
Directorate for Environment and Forestry
Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

22 May 2024

To Whom It May Concern,

Response to Meeting our 30 by 30 commitment on terrestrial and freshwater sites consultation (Published April 2, 2024)

Scottish Renewables (SR) is the voice of Scotland's renewable energy industry. Our vision is for Scotland to lead the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. We represent 360 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable technologies, in Scotland, the UK, Europe, and around the world, ranging from energy suppliers, operators and manufacturers, to small developers, installers, and community groups, as well as companies throughout the supply chain. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can provide solutions to help sustainability heat and power Scotland's homes and businesses.

SR welcomes the opportunity to provide the views of our members to the Scottish Government regarding meeting our 30 by 30 commitment. We are supportive of the Scottish Government's ambition that by 2030 at least 30% of Scotland's land will be protected or conserved for biodiversity, delivering for people and climate. We also support the Scottish Government's recognition that the biodiversity and climate crises must be addressed in an integrated way.

Renewable developments incorporate habitat management plans and nature restoration as a routine part of their development and operation. There are also examples where protected sites are present within renewable energy sites and are managed and enhanced as part of overall site management. For example, Sandy Knowe Wind Farm, in Dumfries and Galloway, has a geological SSSI within the site boundary.

In combatting the climate crisis, protecting ecologically important areas goes hand in hand with reducing carbon emissions. Scotland's ambitions to add 12GW of onshore wind and 4-6 GW of solar PV by 2030 cannot be achieved if we cannot develop a significant number of onshore renewable energy projects.

When designing policies to support the delivery of 30 by 30, these policies must recognise that combining biodiversity protection and conservation with renewable energy developments

is not only possible but is also desirable. Renewable energy projects already make a significant contribution to habitat management and enhancement. As we push forward with Scotland's renewable energy ambitions, policies on biodiversity should build on this legacy, enabling the continuation and strengthening of integrated approaches to tackling the biodiversity and climate crises.

We recommend that policies are designed to integrate the need to address the climate crisis and protect biodiversity so there is no risk of excluding renewable energy developments from a significant portion of Scotland's land. This would risk Scotland's ability to achieve its net-zero ambitions. Policies that disincentivise landowners from leasing land for renewable developments must be avoided. There is a risk that poorly designed policy could push landowners to seek public money for measures such as peatland restoration to unlock income streams like peatland credits, rather than renewable energy developments funding such measures.

SSSIs, Ramsar Sites, SPAs and SACs are already well-established in legislation and policy, so providing NatureScot with enforcement powers would seem a sensible approach. However, Other Effective Area-Based Conservation Measures (OECMs) are a new concept and are not clearly defined. Without a clear definition for OECMs and an explanation of how they will operate, it is not clear what would be appropriate in terms of enforcement powers related to them.

While we support the goal of protecting 30% of our ecosystems by 2030, we would need more detail on criteria for OECMs, definitions for 'level protection' and 'important ecosystem', an understanding of what the rules are around ensuring that land stays in favourable condition are, or how NatureScot will use enforcement powers for our members to support the direction this effort is taking.

Scottish Renewables looks forward to working with you as you develop more detail for this proposal to ensure that renewable energy development potential is not inadvertently reduced as we work to protect ecosystems.

Sincerely,

A handwritten signature in black ink, appearing to read 'Megan Amundson', written in a cursive style.

Megan Amundson
Head of Onshore Wind & Consenting
Scottish Renewables