

By email to: OnshoreWindPolicy@gov.scot

Onshore Wind Policy Team
Scottish Government
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21 January 2022

Dear Sir/Madam

Onshore Wind Policy Statement Refresh 2021: Consultative Draft

Mountaineering Scotland has responded to the Consultation Questions relevant to our interests. We trust you find them informative and helpful in finalising the Policy Statement.

Chapter 1: Current Position - Consultation Questions:

Q1. Does this chapter provide a fair reflection of the current situation faced by Scotland's onshore wind industry?

This chapter confirms that onshore wind has been the main means of generating electricity from renewable sources in Scotland.

From our perspective, this policy statement would benefit greatly from more explicit acknowledgement that the current deployment of onshore wind has had regard to the importance of protecting Scotland's landscape assets, as indicated in the Ministerial Foreword. To increase deployment of onshore wind still further requires continuing protection of Scotland's natural heritage. This includes the scenic value and wild qualities of National Parks, National Scenic Areas and Wild Land Areas, as well as careful consideration of regionally important landscapes.

This overview could also benefit from more incisive analysis of electricity generation capacity and output that satisfies the needs of national electricity demand, current and projected, and how it may be accommodated within a robust planning system that protects natural heritage assets.

The Scottish Government had an aim to generate the equivalent of 100% of gross Scottish electricity consumption from renewable sources by 2020. This document demonstrates provisional figures which show that Scotland reached 95.9% in 2020.

More efficiency in the process of decision-making and more urgency in constructing consented developments is certainly needed to achieve electricity generation targets. It seems that the 'barriers to deployment' for the onshore wind industry is the timely construction of consented capacity, not the planning assessment criteria.

The assertion that 'we must now go further and faster than before' therefore seems more of a call to continue on the same course, with more alacrity in constructing consented projects. Consenting on

average 1GW per year, as was done in the last decade, would mean sufficient capacity would be consented for 20GW to be operational by 2030.

It is an unfortunate matter of timing that this policy statement may be finalised before the draft NPF4, now out for consultation, that sets the planning framework within which onshore wind capacity is proposed and assessed. However, it is helpful to cross-reference planning policy, even if still in draft, linking onshore wind development with a carefully planned and considered process of assessing consents.

Q4. This section also underlines the Scottish Government's strong commitment to the role of community energy, and to community benefit and shared ownership. In what ways can we maximise the benefits of these policies as onshore wind development and repowering increases over the coming decade?

Mountaineering Scotland would support policies that enable community ownership and development of a range of renewable energy projects, at a variety of scales, within the exiting development management system. We understand the need for mountain communities to be sustainable.

It is important to note that Mountaineering Scotland's role regarding Onshore Wind policies is to assess the landscape impact of civil engineering works on recreational activities in mountain areas, and that a community owned windfarm may have the same visual impact as a commercial one.

Setting a target to support more small-scale community-owned projects may be beneficial.

Chapter 2: Future Position and Net Zero - Consultation Questions:

Q6. What are your views on the installed onshore wind capacity that will be necessary over the coming decade, recognising the ambition Scottish Government have proposed for 8-12GW? Please share any evidence.

We recognise the importance of achieving Net Zero and that will involve more onshore wind generation, but we urge caution on the overall tenet of the policy that because of climate change we have to go faster and harder with onshore wind. This potentially conflicts with other areas of policy. We need to continue to be objectively selective and weigh up options - both in terms of other sources of energy and in terms of where those windfarms go.

Our opinion is that continuing to apply the same judgement on the planning balance that has applied during the past decade should achieve the Scottish Government's onshore wind ambition, while conserving the wild and scenic qualities of Scotland's important landscapes. But only if developers play their part and actually build consented wind farms timeously.

From figures available (as at September 2021) it appears that there is 8.7 GW of onshore wind operational, with 5.2 GW consented but not operational (of which only 0.7 is under construction)

3.3 GW is likely to be consented from 5.1GW currently in planning (applying the historic S.36 consenting rate of 73% (2015-2021) and allowing for some double counting from variation applications for consented developments.

So, by mid-decade an additional 8.5GW could be operational or consented. That would achieve the lower level of the Government's ambition for 2030 from what is already in the pipeline. Continuing to apply the same judgement on the planning balance that has applied during the past decade, protecting Scotland's natural heritage assets, should more than achieve the government's onshore wind ambition.

This requires no more than a modest increase in level of capacity consented annually. Whether that potential capacity will be operational is not an issue of speed of consenting but of speed of building.

There has been a substantial level of scoping activity for onshore wind in recent years. The ECU website shows 32 Scoping Reports submitted between November 2020 and October 2021, with over 3GW (estimated) of proposed new capacity. There will be no shortage of onshore wind applications in the next few years capable of being built in the second half of the decade.

The reluctance to build consented developments is a significant challenge for government policy, perhaps the most significant immediate challenge, yet the Draft Onshore Wind Policy is silent on the matter.

There would be benefit in giving some consideration to the ability of the landscape to accommodate these aspirational generating capacity targets or how to optimise the spatial distribution of capacity to best harvest the variable wind resource as it passes over Scotland, while conserving natural heritage assets for the future. This would save on resources of time and money expended in pursuing inappropriate onshore wind projects.

Q8. In what way(s) can we maximise the benefits of repowering over the coming decade?

It is our opinion that repowering is unlikely to have a significant impact on operational capacity before the 2030s. We agree that not all developments will be considered appropriate for repowering, and support the statement that not all environments are able to accommodate the new generation of tall turbines – the tallest tip-heights may not be appropriate in every landscape or for every development.

Repowering would therefore benefit from a planned approach, and collaboration in design, to clusters of existing windfarms.

Low-risk, low-cost life extensions may be an attractive option to maintain electricity generation capacity while new capacity is timeously constructed.

Chapter 3: Barriers to Deployment: Technical and Reserved Matters – Consultation Questions

Q9. We would be grateful for comments on the issue of aviation lighting and suggestions for the focus and outputs of the Aviation Lighting Working Group – what are your views on the assessment of aviation lighting and how this should be undertaken?

Aviation lighting on turbine nacelles can have a disproportionate visual impact on wild landscapes in low light conditions throughout the year, and especially between the autumn and spring equinoxes. We support the proposed setting-up of a short-term working group to consider this issue and to produce guidance that takes this effect into account during assessment of the Landscape and Visual Impacts of proposed onshore wind projects.

Q10. We would also be grateful for your views on network charging and any of the other aspects set out under section 3.4.

Security of Supply/Storage Potential - Co-location of small batteries with Onshore Wind developments such as is now being seen in Scotland is appropriate, since such batteries smooth the minute-to-minute output from a wind farm to the grid. This should not be confused with long-term energy storage of a scale to maintain supply during multi-day periods of calm weather. Distinguishing between these types of storage would be beneficial, along with estimates of the levels of storage required to maintain supply nationally during calm periods.

Co-location of electricity generation and hydrogen production is not necessarily the most advantageous or cost-effective approach. A policy like this may encourage the location of hydrogen production away from the market and with no physical pipeline to transport it to market. Wind

farms are not necessarily located adjacent to water bodies, essential for hydrogen production. Transporting electricity to power hydrogen production closer to where it is needed in bulk and where pipeline networks already exist would appear to be a sensible policy.

Chapter 4: Barriers to Deployment: Environmental Factors - Consultation Questions:

Q11. What are your views on the integration of taller turbines in forested areas?

From a carbon sequestration perspective, it would seem sensible to integrate taller turbines in forested areas only when the age of the timber crops requires its felling and removal, and in line with other natural heritage consideration of wildlife, scenic beauty and wild qualities of surrounding landscapes.

Q12. Can you provide best practice examples for effective peatland restoration (with carbon benefits) alongside the development of onshore wind?

It is our opinion that almost every Onshore Wind development proposal already claims to be doing something like this. This appears to us to be endorsing a 'business as usual' scenario. Better protection for peatlands would involve avoiding construction on or across areas of peatland that are actively accumulating peat-forming vegetation.

Q14. From your own experience what can wind farm developments offer in terms of protecting and enhancing the natural environment, in particular through the planting of trees to compensate for those lost during windfarm development and through peatland restoration?

The importance of active recreation, physical and mental well-being, landscape and wild places is insufficiently recognised as a positive asset. This document discusses mitigation around forestry, tree planting and peatland, but the renowned, world-class resource we have in terms of the Scottish landscape is not recognised as an asset whose protection is just as crucial for future generations as addressing climate change.

Section 4.4 Landscape and Visual is disappointing in policy terms. There are four paragraphs of contextual discussion with unqualified statements, but there appears to be little in the way of policy direction for Onshore Wind developers regarding landscape protection.

We have to question the assertion in this document that the understanding of the landscape and visual impact of wind turbines remains an 'evolving area'. There have been many years of research, assessment and visual evidence of wind turbines in the landscape – the tools of assessment have been available for a number of years and judgements applied have been debated in public examination during Public Local Inquiries. This policy statement would benefit from some more detail on what this 'evolution of understanding' actually means.

'Cherished Landscapes' is another expression used that may mean a variety of things and does little to advance understanding of policy. On one hand there is a statement that they must be afforded the necessary protections, and on the other hand is a statement intimating that decisive action is required, that will change how Scotland looks, and that significant volumes of onshore wind generation will need to be deployed over the next decade.

The role of policy is to set direction and parameters for action, and this chapter, in our opinion, fails to define the policy expectations that developers and other sectors of Scottish society need in order to have confidence in steering a direction as to how Scotland's landscapes will look in the decades to come.

We are disappointed in the way that paragraph 4.4.4 expresses a view that the landscape seems to be regarded as an 'unnecessary barrier' rather than a resource of value in its own right with scenic and place-defining qualities. This is a very prejudicial phrase in a Government policy document that freely acknowledges, in the Ministerial Foreword, that Government intention for onshore wind

capacity is “fully aligned with, and continues to protect, our natural heritage and native flora and fauna.”

We reiterate that the main barrier to deployment, on which this policy document is silent, is the timely construction and operation of consented Onshore Wind developments.

Chapter 5: Economic Opportunities - Consultation Questions:

Q23. *Do you have any views on the impact of wind farms on tourism?*

Our opinion is that the issue is not tourism as a whole, but specific forms of tourism in specific locations: landscape-centred tourism in areas of high landscape quality. There is a lack of recent, robust, and analytical research on tourism impacts, instead relying on an outdated, generalist assessment based on a thin sample.

From our perspective there has been a thin but continuous stream of Onshore Wind proposals coming forward for potentially harmful locations for landscape and visual impact on tourism interests. Although only a small minority of all applications received in the planning system, their handling accounts for a disproportionate level of planning resources, especially through Public Local Inquiry.

We suggest this is an area that the Scottish Government could usefully help developers and communities by commissioning sectorally-defined research into the perceptions and motivations of people involved in a range of landscape-tourism activities.

A more nuanced and robust evidence-based policy approach from Scottish Government would reduce the number of contentious Onshore Wind proposals and release resources in the planning system to progress applications for less harmful locations more expeditiously.

Yours sincerely



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