Onshore Wind Policy Statement update consultation

Current Position - Consultation Questions
1. Does this chapter provide a fair reflection of the current situation faced by Scotland's onshore wind industry?
This seems are fair reflection of the current position in terms of legislation and deployment. It is noted that National Planning Framework4 (NPF4) has now been laid before Parliament and that policy 2a states that when considering all development proposals "significant weight should be given to the Global Climate Emergency". It also gives emphasis on sustainable places and Southern Sustainability in the spatial strategy. NPF4 will become part of the Development Plan and will also incorporate Scottish Planning Policy. The justification for the proposed delivery target is far from clear. There does not appear to be a clear fit between NPF4 and the Policy Statement Update in this regard. There is a need for a holistic and planned approach to onshore wind policy and strategy which must be clearly articulated and aligned in both documents. Scottish Borders Council shares the commitment of the Scottish Government to addressing climate change. The Council declared a Climate Emergency on 25 September 2020 and committed itself to signing the Edinburgh Declaration on Biodiversity on 28 October 2021. It is clear that climate, biodiversity and human wellbeing are fully interdependent. They are not unrelated crises, but facets of a unified crisis precipitated by humankind's unsustainable and unequal use of planetary resources. The complex interrelationship of climate, biodiversity and human wellbeing is also evident in the tension intrinsic within the process of planning to respond to the crisis and balancing the different interests of climate action, nature and people generally with landscape, visual, residential and other environmental impacts in the planning of wind farm developments specifically. This is a challenge with which the Scottish Borders is both familiar and fully experienced. On the one hand, we are committed to action. On the other, we recognise that developments to respond to net zero objectives are sometimes in conflict with environmental aspirations and the interests and wishes of our communities. The Scottish Borders has played a significant role in meeting current deployment levels and has approved 394 turbines in windfarms over 5 MW with an estimated total installed max capacity of 892.77 MW and 156 turbines in schemes under 5 MW with an estimated total installed max capacity of 10.93 MW within its administrative area This means that the most obvious and suitable sites have already been developed and there are landscape capacity issues with the development of further new sites and in respect of the scale of potential repowering proposals. The consequences of this are obvious in the heightened concerns of residents, community and environmental bodies, which have increasingly accompanied applications for wind farms. The challenge is reconciling our strategic ambition with local consequences and experience. This is all part of the just transition: if communities are to accept the implications of meeting the climate/nature crisis and the need to race to net zero, then a real sense of the burdens and benefits of responding needs to be felt by those communities. This requires both education and a clear threshold of acceptability of impacts of development; it requires tangible benefit and cost

sharing. For example, impact on amenity is a cost, and we need to find appropriate means of meeting that cost or, where that is not possible, to be able to confidently say why that is so and to be able to robustly defend that position.

The consultation takes very little recognition of consented capacity or why such consented capacity is not being implemented and the real reasons for this. It needs to be acknowledged that the failure to proceed with consented schemes is a major contributing factor in the failure to meet the targets. It is not simply that not enough schemes are being approved.

Whilst the good practice guides for community benefits and shared ownership are welcome and helpful, there are still major concerns relating to the realisation of those benefits and the capacity of communities to engage with the industry. This is even more acute in respect of shared ownership. The knowledge, skills and ability to take advantage of these opportunities and the capacity to secure financial support and take on such risk, means that few such proposals have been taken forward in the Borders. It is not simply sufficient to create a context. If a just transition and a successful onshore wind policy as one of its components are to be delivered, then Scottish Government will need to prioritise the resourcing of delivering community benefits and shared benefits at the local level. This cannot simply be a matter of prescription in addition to myriad other tasks and responsibilities. It must be reflected in real resource support. Ultimately, thought should be given to formalising the process of community development to obviate the risk of more scarcely resourced communities losing out, and to introduce greater certainty for all participants.

2. How can the maximum number of developments be enabled to buildout without finance acting as a barrier?

This is more a question for the industry to respond to than a local authority but we agree that a wide range of financial mechanisms should be investigated to support the development of renewable technologies including onshore wind in Scotland, with sufficient access to mechanisms which support a range of development sizes and types.

As indicated above, there is the need to provide the means for communities (and potentially local authorities) to take advantages of shared ownership, where appropriate.

3. Can more be done to support the use of PPAs/Private Sector Finance? Is there a need for more policy signals from SG, and/or UKG, to provide investment security/surety?

No comment on the mechanisms but there are significant policy directives, which NPF4 strengthen, from Scottish Government.

4. 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?

See answers to 1, 2 and 3 above regarding the challenges of community benefit, energy and shared ownership. There is the need to ensure that there is a clear policy and regulatory position that ensures repowering schemes provide adequate Community Benefit and support to communities to take an ownership role in a windfarm. The provision of a community power toolkit and financial and professional support to such groups would be essential to enable them to participate in this process. Local authorities or other institutions could play a supporting role in

the development of community benefit, although the distinction between regulator and facilitator would need to be very clearly defined (and mutually exclusive) in order for the integrity of the planning process to be maintained. For them to do so, however, will require resource support as explained in our answer to question 1.

This could be strengthened by the clear expectation that developer must engage and support communities rather than just give them "new opportunities".

5. What more can be done to ensure that financial mechanisms are available to support development at differing scales?

This should be set in legislation and subject to periodic review, which could include research into case studies and sharing of good practice.

Future Position and Net Zero - Consultation Questions:

6. 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.

It is clear that the on-shore capacity required will not be provided by repowering alone. Not all sites will be suitable or capable of being repowered and repowering, when acceptable, will only provide for a residual increment in capacity over the existing scheme. This will not make the substantive leap in capacity that is required. Repowering will still be controversial and it is not accepted that most communities will be ambivalent to the proposals. However, the Scottish Planning Policy position regarding the materiality of the fact that they are generation sites already, that have been subject to renewables development/disturbance, means that they should be considered first before the promotion and development of new sites.

Logic dictates that, if this capacity is to be delivered and this has to be provided on-shore, then a large number of turbines of greater output (and size) will be needed and this will have a potentially significant impact on our landscapes, their qualities and the communities in the Borders and throughout Scotland. The principle of the right development in the right place should continue to apply and that the environmental and landscape qualities of the Borders should not be adversely prejudiced. That is as relevant to repowering proposals as it is to new sites. Within the Scottish Borders, considerable effort was made in negotiations with developers to amend schemes – through reductions in numbers or heights of turbines or through their repositioning – to ensure that developments were acceptable and appropriate to their setting. Even allowing for changes in targets, it may be challenging to justify arriving at a different view and – in the eyes of the community – so undo all of the work undertaken to make a proposal acceptable.

There is a strong argument that, as the complexity and cost of provide turbines off-shore is reducing, that is where the most significant gains in capacity could and should be delivered. However, it is acknowledged that such sites are more likely to be developed post 2030 and will contribute to the later targets to 2045. An active acceleration of the off shore programme would help reduce the need for such extensive onshore provision.

The ability of existing consented sites (or sites in the planning process) to connect to the grid network would be a major influence in the extent of new sites required. The delivery of sites that have already been through public scrutiny and detailed evaluation should be prioritised over the provision of extensive new sites.

The development of other generating technologies must be developed to avoid overreliance on wind power. This includes solar, tidal and hydrogen (accepting that wind has a significant role here). There is also importance to be attached to the resilience and investment in the existing infrastructure network, as the impact on the National Grid of the recent Store Arwen acutely demonstrated.

7. What more can be done to capture the potential and value of hydrogen production from onshore wind and how best can we support the optimal integration of these technologies?

There is great potential to develop hydrogen production in association with windfarms. It would be possible to require that windfarm developments be developed as energy hubs where hydrogen production capacity is an established part of the energy proposal. This could be supported by analysis to established demand and markets for local and national provision which helps decarbonise transport/fleet/freight.

There is the potential for the Council to bring forward the development of a hydrogen fleet for the region, if we bring in the likes of Energy companies (or other hydrogen producers) and our other fleet owners in the Borders together.

With the remote nature sites for employment opportunities, we need to consider workforce mobility. There may be the ability to improve public transport to this area through windfarm support and use by employees. Demand Responsive Transport would be a great solution for this area and flexible enough for communities and the employees.

Operation and maintenance of the windfarm will require a fleet of vehicles so they could be hydrogen or EV. Is there the possibility to build this into the EV feasibility study the Council is currently undertaking as part of the Community renewal Fund project? This could also include the supply of energy from such energy hubs.

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

See replies to Q1, 4 & 7.

There is the ability to reuse some of the existing infrastructure serving the existing windfarm. It is understood that it is possible to “supertune” smaller turbines or refurbish them with more efficient blades that would mean the avoidance of new foundations and larger turbines in inappropriate locations

There has been limited ability to take advantage of community benefit in terms of shared ownership. As stated in earlier responses, SBC has been able to develop an off- set scheme that provides biodiversity benefits and we are keen to see the development of hydrogen production in in repowered scheme. As a matter of course, the same provision and requirements should apply to repowered site that would apply to new windfarm development in these regards.

Barriers to Deployment: Technical and Reserved Matters - Consultation Questions

9. 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?

As the majority of new turbines are likely to trigger the need for aviation lighting, the provision of guidance from the working group at the earliest is critical to the consideration of new windfarm developments. Scottish Borders Council has refused one application on the basis of potential lighting impacts and this has been tested at appeal. The determination did not fully clarify the position in terms of impacts and mitigation and this amplifies the need for national guidance on this issue.

This was a section 36 at Crystal Rig IV (18/00768/S36) and the link to the case files is:

18/00768/S36 | Erection of 11 turbines, 4 No turbines up to 149.9m high to tip, 3 No turbines 174.5m high to tip, and 4 No turbines 200m high to tip and associated works | Crystal Rigg Wind Farm Cranshaws Cranshaws Duns Scottish Borders TD11 3SR (scotborders.gov.uk)

Aviation lighting on windfarms in Scotland is a relatively new introduction following the increase in turbine height and, as yet, is untested in the Scottish Borders. This is a new area of assessment and up to date guidance is required for future windfarm developments and repowering with turbines over 150m. Aviation lighting in rural locations can have a disproportionate visual effect given their presence in an otherwise dark, and therefore 'featureless' landscapes, reducing the sense of remoteness and the experiential qualities of dark sky landscapes. They can also have a negative effect on landscape and visual amenity during hours of dawn, dusk and low light levels when the red aviation light may be seen in addition to turbines and in the context of landscape features. They have the additional potential of being a collision risk to birds. (The Effect of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and other structures. NatureScot. 2020).

It is within the control of developers and the CAA to develop and utilise aviation lighting that minimises landscape and visual impacts and impacts on wildlife and there should be a much greater urgency for these solutions to become embedded into all schemes. Alternative technologies should be considered for example, the use of infrared lighting as this is not visible to the naked eye. Implications for visibility of lighting is dependent on exact technical specification of the lights and methods of mitigation to reduce intensity (including shielding). In addition to updated guidance on designing with large wind turbines and lighting, technology and specifications require testing and standardising to minimise landscape and visual impacts.

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

There is a need to ensure that connections costs are fair and proportionate and do not form a barrier to development and investment. The progress to meeting targets will not be met (even if sufficient planning permissions are granted) unless there is a means to effective and affordably connect to the grid. This needs to be delivered at pace and significant investment in the network is required on a short period of time. This needs collaboration between agencies and UK and Scottish Governments if the required transition is going to be delivered in time.

Barriers to Deployment: Environmental Factors - Consultation Questions

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

There is not a fundamental objection to this proposal, it depends on the site and the landscape context. We feel there is the potential to undertake keyhole insertion of larger turbines into woodland/forestry areas through discrete and limited tree felling. The impacts of tree loss can be

addressed through plantation management schemes and on-site replanting. Where this is not possible then there is the potential to do this off-site and link to our Biodiversity/Forestry Off – Setting scheme.

In practical terms, the height of present-day turbines relative to retained forestry may make them more efficient on account of the potential for reduced turbulence, but this has to be offset against the increasingly limited landscape and visual mitigation that would have been provided by the retention of the trees.

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

There is information about peatland restoration in the consultation but little about peatland loss as a result of schemes or what weight that carries in refusing development or re-designing layouts.

13. What, if anything, is not currently reflected in the good practice guidance for constructing windfarms, in relation to building on peat and other carbon-rich soils?

This guidance is relatively up to date having been published in 2019 but, as with other guidance, the potential for it to be kept under regular review with updates as required, would undoubtedly have merit.

The protection of peat from renewables should be strengthened. Modified peatlands are less well protected as habitats. (the carbon calculator is still used to calculate loss of C from development of the windfarm v C emission reductions through operation of the wind farm The modified peatlands are the most investable for the carbon markets, as they sequester more carbon than peatlands in good condition). It is to the detriment to biodiversity and the environment if any peat/peatlands are lost through renewable development.

14. 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?

Windfarm developments can deliver positive effects for biodiversity. It is important to ensure that renewable developments do this, as set out in draft NPF4. Habitat Management Plans and offsite delivery (where appropriate) are ideal means of achieving this through enhancing local nature networks and providing mitigation & adaptation to climate change (carbon sequestration, NFM, water flow regulation (droughts).

The Council has developed an award winning Woodland/Biodiversity off-setting scheme which has sought, where appropriate, to off-set developmental/ environmental impacts and provide opportunities for enhanced habitat development off –site. The Projects have included:

- two black grouse projects
- natural flood management in the Gala water catchment
- two projects for blanket bog restoration being managed by SBC, which we have been working on with LBAP partners and developers

The details of this can be viewed at:

Biodiversity projects | Biodiversity | Scottish Borders Council (scotborders.gov.uk)

This is highlighted and used as an example in the RSPB/CIEEM/RTPI guidance: Biodiversity net gain. Good practice principles for development: Case Studies (p51/61)

https://cieem.net/resource/planning-naturally/

The guidance illustrates twelve principles of good spatial planning and the SBC case study is used to illustrate principle 7- Alternative options should be considered, particularly alternatives that are less damaging to the environment, and the reasons for rejecting any options should be made public. The Scottish Borders biodiversity offsets scheme shows that a range of detailed options for mitigation or compensation can successfully be considered at the project level.

It is essential in the view of the Council that a considered view of the wider environmental impacts from development is taken. It is self-defeating, if we develop wind farms in places which damage species, ecosystems and/or landscape types. There is a still some sense that biodiversity is viewed as a subservient consideration. However, it remains the case that we must ensure the right development in the right place, both from a landscape and biodiversity standpoint.

However, understanding of these interactions is still nowhere near as developed as it needs to be. Wind energy can have adverse impacts on some species, including direct impacts to birds and bats from turbine collisions, and the loss and fragmentation of species' habitat. Scottish Government needs to do more to commission nature impact studies, so that competing objectives in pursuing planning/repowering of sites and so on are set against a strong strategic understanding of the issues.

15. Can you provide best practice examples of encouraging biodiversity protection and enhancement, including connectivity between natural areas in wind farm sites?

See answer to 14 above.

16. What is your organisation doing to go above and beyond when it comes to biodiversity protection, conservation and enhancement in wind energy development sites?

See answer to 14 above.

17. How can habitat management plans better balance protection of the environment with connectivity and the operation requirements of a site?

Habitat Management Plans and offsite delivery (where appropriate) are an ideal means of achieving enhanced biodiversity through enhancing local nature networks and providing mitigation & adaptation to climate change (carbon sequestration, NFM, water flow regulation (droughts). Offsite delivery can assist with easing the operational requirements of a site.

Biodiversity Net Gain should be embedded into all HMPs.

Economic Opportunities - Consultation Questions

18. What support do Scottish companies need from Scottish Government and agencies in order to successfully bid for and win contracts?

This question is perhaps one more for the onshore windfarm industry to respond to. However, in broad terms, it should be expected that there is fair and level playing field for Scottish/UK supply chain companies to bid for contracts and that as projects develop, there should be a binding requirement for early engagement with local supply chain companies to ensure they have the best possible chance to compete and develop their capabilities in this field. There should be Scottish Government support to develop the capacity of local supply chain companies.

19. Should government consider options for introducing a sector deal similar to that of the Offshore Wind sector and if not, why is that your view?

This approach is supported. Whether it is called a sectoral deal or spatial framework etc; if it is something similar to ScotWind this makes some sense and gives certainty to communities and developers.

20. How can individual organisations (including onshore wind developers, tier 1 suppliers, and the domestic supply chain) work collaboratively to ensure that key manufacturing projects for Scottish onshore wind stays in Scotland?

This question is perhaps one more for the onshore windfarm industry to respond to. However does this need a change to the terms of the contract award under the Act to insist that such opportunities are taken/made available? Scottish Government, enterprise agencies, local authorities and other public third sector and private bodies have a role. Scottish Government needs to continue the momentum in seeking to create the business ecosystem to develop the wind renewables industry.

21. Circular economy and zero-waste are core principles that the Scottish Government are promoting. Where do you see the economic opportunities in relation to these policy issues lying with onshore wind? And are there any practical issues you think need to be addressed in order to maximise the benefits?

As noted earlier, the Scottish Borders already provides a significant contribution to national renewable generation. We expect this to increase, and the region is firmly committed to playing its part. Yet, hoped-for socio-economic benefits to the region have not materialised thus far. This is concerning and disappointing, given that previous energy transitions have been catalysts for sustained periods of national and regional development: coal in the Central Belt; hydropower in the Highlands; and oil and gas in the North East. The permissive nature of community benefit developer contributions has failed to garner significant benefits and what it has achieved has been on a sporadic ad hoc basis, very often dependent upon the commitment, resources and enthusiasm of the communities concerned. The Council believes that delivering benefits for consumers (domestic and business) should be an explicit aim of strategic policy as a counter to the challenges which emerge from the region's rural context. This should take the form of guaranteeing a resilient and well-integrated regional supply network, and in pricing benefits to consumers. Moreover, there is a need to convert the combination of national decarbonisation ambitions and our local transition assets into employment and enterprise creation within the Green Economy, supported by the development of a training infrastructure, which generates increased socio-economic benefits for our region and the country.

At the same time, the Council and partners such as South of Scotland Enterprise are committed to a Regional Economic Strategy for the South of Scotland, 'where natural capital propels green growth.' This means more, higher skilled and better paid jobs associated with the renewables

industry; new sources of revenue for landowners and farmers and an increased local tax base. It must mean, however, wider shared community benefits like those described in answer to previous questions.

Furthermore, we can increase prosperity in our local economy (as well as the national economy – it is right that the South of Scotland should be expected to make a bigger contribution to national prosperity) through circular economy principles and practice - making better use of materials, components and products by minimising the amount of resources taken from the natural environment, maximising the prevention of waste and optimising their economic, social, technical and environmental values throughout consecutive lifecycles. Scottish Government has an indispensable role in creating the necessary ecosystem with the Council and other protagonists also playing a vital part: e.g. through eliminating avoidable waste; and strategies which promote designing for durability, repair, reuse and remanufacturing of components and products, and lifetime extension and, we might add, repowering of wind farms.

22. How can the Scottish Government best support skills for the future of the onshore wind sector? Specifically we would be interested in oil and gas transition, apprenticeships and entry-level positions for young people, as well as any other experiences you can share.

No comment.

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

The impact on tourism has been a longstanding matter of debate and one that arises whenever proposals are tested through the appeal process. The challenge is that there are a number of studies, surveys and reports produced over time which provide a very confused and conflicting picture. As a consequence, reports will be used to suit whichever argument is being presented. It would therefore be helpful – indeed, necessary – for there to be a definitive study into this issue.

At a very high level, the fact that the emerging NPF4 continues to state that wind energy proposals should not be allowed in National Parks – areas recognised for their recreational and landscape value – does seem to suggest a policy recognition that turbines and tourism are not entirely compatible.

Of course, much will depend on the location and circumstances of a proposal, but it would be wrong to conclude that there is no impact on tourism, rather the question is whether that impact is tolerable on a case-by-case basis, which returns us to the point about acceptable or tolerable thresholds for landscape, visual and residential amenity impacts.

Of concern in this consultation is the relatively light touch given to these impacts; it is striking to make the comparison to the space attributed to peat restoration when compared to landscape impacts, for example. Within the Borders, the latter has been a far more significant issue for the decision-making process than the former and it is important that this is given full and proper consideration, even if to establish the Government's position on what the acceptable tolerances are likely to be at a national level.

Having been subject to wind energy developer interest consistently since the early 1990s, Scottish Borders Council has invested significant time and resource in producing landscape capacity studies as a means of both directing developments to appropriate locations and protecting our most important landscapes. As part of this exercise, heights of turbines have been were established as being appropriate to particular settings, including in long-range views. As stated

earlier in this response, even allowing for the greater impetus to meet targets, it may be difficult to now arrive at a view that conflicts significantly with previously agreed impact thresholds.
24. What is your organisation doing specifically to promote diversity and inclusion in the onshore wind sector?
This is a question for the wind energy industry.
25. Given the significant contribution onshore wind is expected to make to our net-zero ambitions, and the structure of the ScotWind process for offshore development, should Supply Chain Development Plans be introduced for onshore wind developments in Scotland?
This seems a sensible suggestion and is supported.
Annex 1: Eskdalemuir working group and policy proposals – consultation questions
26. Does the above accurately reflect the current position in relation to the Eskdalemuir Seismic Array and the barrier it presents to deployment in Scotland?
The stated position is a fair and accurate reflection of the situation.
27. Acknowledging that the Scottish Government require further evidence before taking a policy decision, at this point and reflecting the options outlined above do you/your organisation have any thoughts?
Option 2 still places strong the emphasis/responsibility on the MoD. It would be concern that this could cause challenges providing effective, reasonable and enforceable conditioning of consents as there is no guarantee a solution will be found. Some clarity as to the weight of the MoD position in the overall planning balance is required particularly if the research suggests that the MoD are being cautious.
8. If Option 2 or Option 3 were to be selected, how could we best achieve or calculate an acceptable level of impact? (One example being an agreement of a standard noise budget to MW generated proportional allocation I.e., for X MW generated = X amount of budget allocated).
This is likely to be a technical matter for the MoD to provide commentary on.
29. Do you/your organisation have any thoughts on how the EWG might be restructured to ensure continued engagement for interested parties whilst maintaining the core purpose of the group?
The constitution of the body is not something that the Council is familiar with and therefore this is not a matter upon which it can meaningfully comment.
Annex 2: Aviation and renewables collaboration board – consultation questions
30. We are clear on the value and importance of strategic and productive collaboration between the aviation and wind energy sectors. What are your thoughts on our proposed restructuring of the current effort and activity in this area, and the proposed Aviation and Renewables Collaboration Board?

There is certainly logic to this suggestion.
31. The work of the Aviation and Renewables Collaboration Board may identify and agree the need technical or strategic investment to achieve specific goals or outcomes. What are your views on how work of this kind might be financed?
This should be financed jointly by the renewables and aviation industries.