



Scotland Against Spin

The alliance for all opposed to National Wind Energy Policy

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SPP Review Team
Area 2H, Victoria Quay
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12th July 2013

Dear Sirs,

Re: NPF3 Consultation Response

I am responding on behalf of an organisation.

I am agreeable that the name and address of Scotland Against Spin (the organisation) is made available to the public (in the Scottish Government library and/or on the Scottish Government web site) and that you may share our response internally with other Scottish Government policy teams who may be addressing the issues we discuss. I am content for the Scottish Government to contact me again in relation to this consultation exercise.

How can NPF3 support the transition to a largely decarbonised heat sector?

Question: *Could NPF3 go further in supporting a spatial framework to help achieve our ambition of decarbonising the heat sector and guiding the necessary infrastructure investments?*

Answer: Yes, but at huge, unaffordable cost to industry.

Comment: Demand reduction is the key to decarbonisation of all sectors and that will come more through price and availability than through improved energy efficiency. District heating and combined heat and power are not all “renewable” and map 1a needs to clarify that.

Question: *How should we provide spatial guidance for onshore wind?*

- 1. Scottish Planning Policy already safeguards areas of wild land character. Do you agree with the Scottish Government’s proposal that we use the SNH mapping work to identify more clearly those areas which need to be protected?*
- 2. Should NPF3 identify and safeguard those areas where we think there remains the greatest potential for further large scale wind energy development? Where do you think this is?*

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3. *Should further large scale wind energy development be focused in a few key locations or spread more evenly across the country?*

4. *Is spatial guidance for onshore wind best left to local authorities?*

We have also considered this in our response to SPP.

Answer/Comments:

1. While the SNH mapping of wild land identifies discrete areas of wild land, sometimes close together the absence of buffer zones makes the application of real protection almost impossible. It is disappointing that the Government has not granted these areas statutory protection or is short sighted in not recognising the need for buffer zones.

The management of wind energy developments and the infrastructure necessary to link them to the electricity network needs to be looked at as a whole and not as two separate functions as generation and distribution are in fact all part of the same development. It is a constant concern when Planning Authorities are considering wind farm applications that the infrastructure required to connect them to the National Grid are a separate application as the environmental impacts of both should be considered simultaneously.

The Scottish Government's proposal to raise the level of protection for National Parks and Scenic Areas is welcome though it must be clear that developments that are outside these areas but impact on them must be subject to stringent tests to assess their potential for harm and protect the qualities that qualify the areas for designation.

NPF3 should also increase the level of protection from wind energy and infrastructure developments afforded to other protected landscapes, including Local Landscape Areas and Designed Landscapes.

2. The use of the word safeguarding is perverse as its usual use is to safeguard areas from wind farm development, not for wind farm development. Safeguarding areas for future wind farm development on the basis of greatest possible potential ignores all the factors against development – such as landscape and visual impact, the need to preserve swathes of Scotland from (further) industrialisation by turbines and wind farm infrastructure, etc – and would produce a lop-sided weighting in SPP towards “potential”.

The Government needs to face the fact that although they have stated that there is no cap to turbine development there is a line that has to be drawn, that there is not limitless scope and we are of the view that the tipping point has been reached. NPF3 and SPP should be based on an audit of all constructed and consented wind developments and on the basis of this propose a limit to future development.

3. There should be no further large scale wind farm developments.

There could be a strategic approach to meeting the Government Targets and this could be addressed through NPF3 where areas of Scotland could be sacrificed to wind energy development **subject to suitable compensation, re-location etcetera** for those affected. Developers could bid for areas much as in offshore and policy put in place promoting these

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areas and denying development elsewhere. It would also concentrate infrastructure in tighter areas.

While we are against promoting wind farms the emphasis needs to change from the ad hoc developer-led shambles that currently obtains to a strategic structure more along the lines of off-shore and as suggested above.

This would also remove the burden from Local Planning Authorities and give the certainty to the industry it is constantly asking for.

4. Spatial planning requires local consultation and is best to be left to LPAs and they should be allowed autonomy in assessing what development capacity there is in their planning area rather than yielding to unreasonable and unrealistic pressure from the centre.

Question: *How can onshore planning best support aspirations for offshore renewable energy?*

Should we include onshore infrastructure requirements of the first offshore wind developments, wave and tidal projects as a national development?

Answer/Comment: The most advanced offshore developments in planning are in the Moray Firth and off the Firths of Tay and Forth and already have applications lodged for on-shore connection so the opportunity has been missed. We have no doubt that local authority planning resources can deal with the connection issues.

Map 3 is a 'Mickey Mouse' effort at mapping and proper mapping rather than artists' impressions would give more authority to the document.

Question: *How can we support the decarbonisation of baseload generation?*

Do you think that NPF3 should designate thermal power generation at Peterhead and/or a new CCS power station at Grangemouth, with associated pipeline infrastructure, as national developments?

Is there also a need for Longannet and Cockenzie to retain their national development status as part of a strategy of focusing baseload generation on existing sites?

Answer/Comment: Carbon Capture and Storage bolted on to existing thermal generators is an inefficient, energy hungry, extremely expensive, unproven way of decarbonising base load generation. It is tinkering with a problem that can only be addressed by commissioning new nuclear and new gas turbine capacity.

Question: *What approach should we take to electricity transmission, distribution and storage?*

Should we update the suite of grid enhancements and include the landfall of a possible interconnector from Peterhead? What projects should be included?

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What more can NPF3 do to support the development of energy storage capacity?

Answer/Comment: It should be a national priority to build new gas storage capacity so that gas supplies can be imported when prices are economically sensible rather than when there are crisis shortages of gas available in the cold winter as has happened over the last number of years.

Question: *Does our emerging spatial strategy help to facilitate investment in sites identified in the National Renewables Infrastructure Plan?*

Are there consenting issues or infrastructure requirements at NRIP sites that should be addressed in NPF3 through national development status or other support?

Answer/Comment: No

Question: *Can NPF3 do more to support sustainable use of our environmental assets?*

Should NPF3 propose any specific actions in relation to the role of land use in meeting climate change targets, for example for woodland expansion, peatland or habitat restoration?

Should the strategy be more aspirational in supporting the development of a National Ecological Network? If so, what should the objectives of such a network be?

Answer/Comment: The Government advice in its mitigation and management of construction of wind farms on peatlands is not convincing or robust, and is seen as a mechanism under which this much valued world asset for carbon storage will be sacrificed to thousands of tonnes of concrete and hundreds of miles of roads and cable trenches. Producing energy from wind to save carbon while releasing it to build wind farms reflects a profound lack of joined up thinking at central government level.

Questions: *What should NPF3 do to facilitate delivery of national development priorities in sensitive locations?*

Would it be helpful for NPF3 to highlight the particular significance of habitat enhancement and compensatory environmental measures around the Firth of Forth? Which projects can deliver most in this respect?

Are there other opportunities for strategic environmental enhancement that would support our wider aspirations for development, or could potentially compensate for adverse environmental impacts elsewhere?

Answer/Comment: The Moray Firth and the Firth of Tay should be added to the Firth of Forth and legislation should be introduced in the next Parliament to require developers of consented off-shore developments to make major contributions to environmental enhancement and compensatory environmental measures.

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Question: *Can NPF3 do more to support sustainable tourism?*

What are the key national assets which should be developed to support recreation and tourism?

Should a national network of long distance routes be designated as a national development? What new links should be prioritised?

How can we ensure that best use is made of existing supporting infrastructure in order to increase the cross-sectoral use of these routes, and enhance the quality of the visitor experience?

Answer/comment: NPF3 should commit to progress proposals for new National Parks as set out in the document "Unfinished Business" by the Association for the Protection of Rural Scotland and the Campaign for National Parks.

It should be a priority to complete the proposed long-distance paths and trails.

This completes our response to NPF3.

Yours faithfully,

Graham Lang
Chair, Scotland Against Spin