

Response to Amy Keast:

Ms Keast has justified the redaction of the entire section of the SAS response to question 10 of the SG public consultation to its On Shore Wind Policy statement 2021 on the following grounds:

1. *Beaully-Denny power line: the project referenced is not an onshore wind farm and while transmission charging was included in the policy statement, the comments on costs to consumers fall out with the scope of the document.*

Question 10 reads:

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

Section 3.4 of the SG On shore consultation document is headed:

3.4. Grid, Networks and Regulation

Question 10 was therefore not constructed to obtain answers regarding on shore wind farms, but in relation to network charging (and any of the other aspects set out under section 3.4). The Beaully Denny line is part of the national grid network, which was primarily constructed to accommodate the generation from very large numbers of on shore windfarms sited and consented in the Highlands of Scotland. The (redacted) reference provided in the SAS response evidences that justification for constructing the Beaully Denny transmission line. The justification for redaction of SAS comments on the grounds that the Beaully Denny line is not an on shore wind farm is therefore bizarre.

In regard to costs to consumers, which is at the forefront of UK Government concerns, if not the Scottish Governments concerns, the following paragraph from 3.4 of the SG On Shore Consultation document is copied below:

*3.4.17. We have already seen an increase of onshore wind developments co-located with battery storage facilities and, as we continue to progress towards the decarbonisation of our energy system, battery storage will be more and more prevalent. On-site battery storage not only removes pressures from the grid, but enables more locally focussed energy provision, **and reduces costs to consumers** .(underlining and emphasis added)*

Within section 3.4, which forms the basis for responses to question 10, there is direct reference of costs to consumers. There is therefore no justification of the redaction of SAS comments on the grounds that 'costs to consumers' is 'not within the scope of the document'. It evidently is within the scope of that document.

'Costs to consumers' also impacts on other areas of the SG On shore consultation document.

As pointed out in the SAS response, this is also one of the core principles for OFGEM. The additional relevant paragraphs from the consultation document are copied below.

5.2. Consultation on Contracts for Difference (CfD) and Supply Chain Plans

*5.2.1. The CfD mechanism has helped drive down the cost of renewable electricity support **for consumers** in recent years. However, the dramatic reductions in support achieved at recent CfD rounds have also increased the pressure to slash the capital costs of*

renewable electricity projects.

5.3.3. The Scottish Government expects onshore wind developers to engage with domestic manufacturers and ports to ensure that the Scottish supply chain has visibility of a pipeline of contracts. We want developers to seek out opportunities throughout the development of their project to build the competitiveness capability and capacity of the Scottish supply chain which in turn will keep costs down for consumers, as well as creating and growing competitive business, increasing local jobs, reduce emissions and boost our opportunities for exports. Developers should seek to engage Scottish companies early in procurement and open tendering processes and provide support to help them navigate forward.(emphasis and underlining added)

In regard to the SAS comments on tourism, the specific justification for redacting large sections of the SAS comments by Ms Keast , is :

*“2. **Aspects on Tourism:** Although comments made against specific organisations were not inflammatory, statements regarded as facts without evidence, cannot be included.”*

Question 23 of the On Shore policy consultation document questionnaire is worded :

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

The question asks for views, which as a synonym translates to: ‘personal belief’ or ‘opinion’. Therefore, this question does not ask for facts or evidence.

Nevertheless, the redacted SAS paragraphs not only provide facts, but references.

For example, the first redacted paragraph (redacted, greyed out section copied below) references the Scottish Government’s own ‘Outlook Tourism assessment 2030’, referred to in paragraph 5.7.5 in the SG On Shore Wind Policy document, which forms the basis for the consultation questionnaire.

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

It is telling that this document does not even consider that there are any adverse effects on rural tourism from industrialisation of Scotland’s landscapes and proximity to villages, towns and hotels/B&B establishments.

This denial is illustrated still further in the SG Outlook tourism assessment 2030, referred to in para 5.7.5. where there is the complete absence of any turbine in any of the multiple photographs and by the complete failure to even mention the word windfarm or turbine throughout the entire publication!”

The second paragraph (redacted, greyed out section copied below) references specific paragraphs from the On shore policy document again (para 5.7.4). This time, SAS highlights that the policy document itself presents bald facts and figures with no supporting evidence.

A contrary view from SAS is provided, which nevertheless is supported by published evidence from May 2021 polls, conducted by Renewable UK and UK Government BEIS, with those facts and figures underpinning those polls available publicly, on line. This is in stark

contrast to the unreferenced statement and figures presented in the SG policy document. It is the SG On shore policy document itself, which in relation to tourism, specifically raises the issue of overwhelming public support for on shore turbines. It is therefore entirely valid that such a statement be scrutinised.

This is supposed to be a public consultation exercise. As such, evidenced criticism from the public should be welcomed, not suppressed.

Misleading data is presented in paragraph 5.7.4, which seeks to suggest that there would be widespread public support for doubling onshore turbines from the current stated density of one turbine every two miles in Scotland:

“5.7.4. Public support for onshore wind has grown significantly across the UK, reaching a new record of 79% in 2019, with opposition decreasing from 12% in 2015, to 5% in 2020.”

No references are provided which underpin this bald statement.

However, Renewable UK and BEIS commissioned polls in 2021, both of which purported to show overwhelming public support for on shore windfarms. The May 2021 Renewable UK poll reported *“Support for building onshore wind farms remains overwhelmingly high at 70 per cent – with levels of support exactly the same among people who live within five miles of a windfarm as those living elsewhere”*

The reality from the 1700 respondents polled were that only 7% (119 people, 0.002% of the Scottish population) were from Scotland which hosts more than 60% of UK onshore windfarms. Of those 119 Scottish respondents, only 38 (0.0007% of the Scottish population) lived within 5 miles of a windfarm (actual proximity to windfarm, receipt of benefit not specified, turbine size and number not specified) . In contrast, 192 poll respondents were from London, which has no turbines!

The March 2021 BEIS poll of public opinion is equally skewed with only 6.6% of respondents from Scotland and only 47 rural respondents in total from the entire poll. Despite this, this poll concluded that 83% of the Scottish populace supported renewables in providing our electricity!

A proper survey of public opinion in Scotland is required with a statistically representative section of the population which excludes those in receipt of windfarm financial benefit or employment and where respondents include those within 2km of the nearest industrial sized turbine.

It is clear that polls of public opinion conducted by industry organisations and even BEIS are unreliable.

The final section of SAS's redacted comments on tourism (redacted, greyed out section copied below), relate to the loss of rural houses and tourist accommodation which have been bought by windfarm developers to facilitate windfarm development.

It is understandable if the Scottish Government would prefer that specific company names are redacted, as some companies have direct communication with Scottish Ministers. However, Data protection regulations do not apply to corporate entities and Ms Keast

acknowledges in her stage one complaint response that comments regarding specific companies are not inflammatory.

SAS's comments are supported by facts in the public domain, which have been presented in publicly available documents held by DPEA for Public Inquiries.

The loss of rural accommodation and hospitality businesses, is entirely relevant to the question of 'impacts of windfarms on tourism'.

The 'opinion/view' sought from participants to this consultation question and presented by SAS is that, *"These are just two documented examples of viable rural homes and businesses being lost to on shore windfarm development, but there are others, where property buy out by foreign developers is referred to publicly as the new 21st Century Scottish clearances. The SG should be ashamed that it is condoning similar land clearances that caused such hardship and grief to so many Scottish families in the 18th Century."*

Redacting not just 'a view' submitted by SAS, but actual evidence of these direct impacts on rural accommodation, suggests the Scottish Government finds the facts unpalatable and is unwilling to even consider that there may be adverse impacts on tourism.

"Effects on tourism" Windfarms contribute to rural depopulation. For example, four rural farmsteads and businesses were bought by Scottish Power to facilitate Whitelee wind farm and its extensions (referred to in para 5.7.6). SPR has unsuccessfully applied for demolition orders for all of those properties, which are now ruinous.

At Sanquhar II windfarm (in planning) CWP Ltd bought out three rural properties, (including a successful B&B on the well known Southern Upland Way), that would otherwise be overwhelmingly adversely impacted. These are just two documented examples of viable rural homes and businesses being lost to on shore windfarm development, but there are others, where property buy out by foreign developers is referred to publicly as the new 21st Century Scottish clearances. The SG should be ashamed that it is condoning similar land clearances that caused such hardship and grief to so many Scottish families in the 18th Century. "

Question 9 reads: 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?

The names of two wind farms referred to in the Personal Statement from a "Resident of East Renfrewshire have been redacted. We reiterate that data protection rules only apply to personal data about individuals, **they don't govern data about companies or any other legal entities.**

Neilston Wind Farm is owned by The Renewables Infrastructure Group which is a large British investment trust dedicated to investments in assets generating electricity from renewable sources. Established in 2013, the company is a constituent of the FTSE 250 Index. It is operated by RES Group which is a global renewable energy company which has been active in the renewable energy industry for over 30 years. Its core business is to develop, construct and operate large-scale, grid-connected renewable energy projects worldwide for commercial, industrial and utility clients.

Middleton Wind Farm is owned and operated by Scottish Power, a vertically integrated energy company based in Glasgow, Scotland. It is a subsidiary of Spanish utility firm Iberdrola. Scottish Power is the distribution network operator for Central and Southern Scotland, Merseyside, North Wales and parts of Cheshire and Shropshire.

Furthermore, the links relating to the aviation lights on these wind farms were **not** redacted even though they relate to and divulge the names of both of these wind farms.

The excerpt from Ms Carol Anderson's Inquiry Report has been completely redacted yet the link to that document, which is published on the DPEA website, remains. The recording of her discussion, under cross examination, in relation to aviation lights at Middleton Wind Farm is also available for viewing on the DPEA webcasts page.

Ms Carol Anderson is a Landscape Architect employed as a Consultant by South Ayrshire Council. By taking part in a public Inquiry, submitting documents for public scrutiny and agreeing to be filmed, she gives up all rights to anonymity.

The consultation question asked ***for comments on the issue of aviation lighting [...]*** , that is what we provided.

We fail to understand how our response violates any policies

Annex 1: Eskdalemuir working group and policy proposals

Our comments put our responses to the questions into context and we see no justification for their removal. We are however aware that what happens with the ENB will be decided by the very few people with full understanding of the complexities among which we include neither SAS nor the Scottish Government"

NPF4 Consultation

With reference to Ms Keast's comment on our observation that no redactions were made to SAS's submission to the consultation for the National Planning Framework (NPF4), despite the similarities in content, we are aware that a different team was involved in the scrutiny of those consultation responses. That is irrelevant. Consistency is paramount and responses to all public consultations should be checked and redacted using the same guidelines. We therefore suggest that the team responsible for the Onshore Wind Consultation has been unreasonably harsh and heavy handed in comparison to others.

In light of the comments above which refute Ms Keast's justification for redacting sections from the SAS comments to the SG Onshore Wind public consultation exercise, (only a limited number are mentioned but it applies to all) we insist that our comments are reinstated. Should this be refused, we request that our complaint is escalated to stage two of the complaints procedure.

Aileen Jackson

Scotland Against Spin

7 September 2022

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