

Energy Saving Trust's response to the Scottish Governments consultation on their Draft Onshore Wind Policy Statement

Submitted on 31 January 2022

Question 1

Does chapter 1 provide a fair reflection of the current situation faced by Scotland's onshore wind industry?

- Strongly agree
- Mostly agree
- Mostly disagree
- Strongly disagree

Please give reasons for your answer.

"Scottish Government Good Practice Principles for Shared Ownership of Onshore Renewable Energy Developments", 2019, states the following ambition for shared ownership:

"Our ambition remains to ensure that, by 2020, at least half of newly consented renewable energy projects will have an element of shared ownership."

We think that section 1.4.4 should mention that the Scottish Government's ambition for 2020 was achieved, with nearly 59% of newly consented renewable energy projects having an element of shared ownership.

Question 2

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

We think it would be helpful if section 1.5.3 recognised that the benefits of community owned wind turbines are not only in the renewable electricity generated to help meet net-zero obligations, but also in the income generation, economic regeneration, community empowerment and a just transition to net-zero.

Community owned wind turbines have been commercially unattractive since the ending of the Feed in Tariff.

There is therefore a need for an alternative financial mechanism to enable these projects to be realised in future.

Prior to FiTs, many of these projects were realised with capital grants from sources including Big Lottery Growing Community Assets, but this type of support was superseded by FiTs.

Now that FiTs are no longer available – and very unlikely to be reintroduced – capital grants could support projects again, for example through CARES.

Low interest rate loans could also help communities to realise projects.

Question 3

Can more be done to support the use of Power Purchase Agreements/Private Sector Finance? Is there a need for more policy signals from Scottish Government, and/or UK Government, to provide investment security/surety?

- X Yes
- No
- I don't know

What more can be done to support the use of Power Purchase Agreements/Private Sector Finance?

Community owned wind turbines aren't able to benefit from the economies of scale that can be gained by ever larger wind farms. The UK Government should consider allocating some of the CfD (Pot 1 and Pot 2) revenue support separately to community owned projects. This would of course require collaboration between Scottish and UK governments and action from the UK Government.

Is there a need for more policy signals from Scottish Government and/or UK Government, to provide security/surety?

As noted in our response to question 3 above, perhaps more policy signals from the UK Government regarding a separate CfD allocation for community owned projects and perhaps from Scottish Government regarding the reaffirmation of its ambition for offering shared ownership.

Question 4

Chapter 1 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?

As stated above, alternative financial mechanisms and ongoing expert support will be required to maximise the benefits of the Scottish Government's ambitions for community and shared ownership projects.

This support has recently resulted in the first shared ownership agreement in an unsubsidised wind farm at Crossdykes in Dumfries and Galloway, and there is a strong pipeline of over one hundred shared ownership opportunities.

Ongoing support from the Scottish Government is required to ensure that shared ownership and community benefit funds are secured for the lifetime of projects, including extensions to, and repowering of wind farms. This lifetime ambition could be reinforced in any future refresh of the Scottish Government's good practice principles.

Question 5

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

As noted in our responses to Q2 and Q3 above, we think that more could be done in relation to CfD, capital grant and low interest loan mechanisms as well as expert support from EIF/ SNIB, Local Energy Scotland and CARES.

Question 6

What are your views on the level of 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 analysis that you, or your organisation has conducted on the onshore wind contribution to net zero, or any personal perspectives you have.

No comment.

Question 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?

No comment.

Question 8

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

This is covered in our answer to question 21, below.

Question 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?

No comment.

Question 10

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

Access to the network for community owned projects needs to be improved. More effective collaboration is required between the distribution and transmission network operators and communities to help them to achieve a just transition to net-zero.

Question 11

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

No comment.

Question 12

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

No comment.

Question 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?

No comment.

Question 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?

No comment.

Question 15

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

No comment.

Question 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?

No comment.

Question 17

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

No comment.

Question 18

What support do Scottish companies need from Scottish Government and agencies in order to successfully bid for and win contracts for the development, construction and operations of onshore wind farms?

No comment.

Question 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?

- Yes
- No
- X I don't know

Question 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?

No comment.

Question 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?

It has been suggested that, as wind farms get ever larger, some smaller sites might become redundant and available for community purposes.

Circular economy opportunities around refurbishing the current fleet of turbines for reuse could create an opportunity for Scottish communities and businesses. These could be targeted in areas where turbine height restrictions are in place, where single turbines are appropriate or where industrial sites are connected to load.

There are examples of communities using refurbished turbines already, for example Coigach (<https://localenergy.scot/casestudy/coigach-wind-turbine/>). The practical issues for communities and business are likely to be around ensuring affordable operation and maintenance contracts, long-term warranties, confidence of funders

Question 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.

Energy Saving Trust is seeing increased interest and activity in using community benefit and shared ownership funds to relieve local fuel poverty, improve energy efficiency and generally work towards net-zero. This presents opportunities for local energy efficiency officers, apprenticeships, installers, trainers, and others. Scottish Government and its agencies including Highlands and Islands Enterprise and South of Scotland Enterprise could, perhaps, work in collaboration with developers to deliver appropriate schemes.

Question 23

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

No comment.

Question 24

What is your organisation doing specifically to promote diversity and inclusion in the onshore wind sector?

Diversity and inclusion are promoted by Local Energy Scotland through the CARES eligibility criteria including support for various faith groups and their buildings.

Question 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?

- Yes
- No
- X I don't know

Please give reasons for your answer:

Question 26

Does the position described in the draft Onshore Wind Policy Statement accurately reflect your view on the current position in relation to the Eskdalemuir Seismic Array and the barrier it presents to deployment in Scotland?

- Strongly agree
- Mostly agree
- Mostly disagree
- Strongly disagree

Please give reasons for your answer:

No comment.

Question 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?

No comment.

Question 28

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.*)

No comment.

Question 29

Do you/your organisation have any thoughts on how the Eskdalemuir Working Group (EWG) might be restructured to ensure continued engagement for interested parties whilst maintaining the core purpose of the group?

No comment.

Question 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?

No comment.

Question 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?

No comment.