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Consultation on a Draft Onshore Wind Policy Statement: Analysis of Responses: November 2017

BUSINESS AND ENERGY

social research

Analysis of responses to the Consultation on the Onshore Wind Policy Statement

Why Research, November 2017

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Executive Summary

Introduction

1. The Scottish Government consultation on a draft Onshore Wind Policy Statement was one of a number of consultations published alongside the draft Energy Strategy.

2. The draft Onshore Wind Policy Statement reaffirmed the Scottish Government's existing onshore wind policy and the consultation asked for views on a number of issues relating to supporting the sector. It ran from 24 January until 30 May 2017.

Respondent Profile

3. 89 organisations and individuals, from the following respondent sub groups, submitted a response to the consultation:

	Respondent Groups
	Number
Aviation specialists	4
Communities	3
Environmental and energy advisory (non-governmental)	6
Public Sector / Delivery Agency / Regulator	7
Land / Landscape	2
Lobby and interest groups	4
Local authorities and planners	16
Onshore wind industry	35
Total organisations	**77**
Individuals	12
Total respondents	**89**

Main Findings: Route to Market

4. Many respondents praised the Scottish Government's aim to support a route to market for onshore wind.

5. A large proportion of respondents either explicitly stated, or implied, support for the inclusion of wind farm 'efficiency' as a material consideration in the Section

36 consents guidance. A major theme in responses, from across groups and particularly the onshore wind industry, was that 'efficiency' is either difficult to define or, potentially, ambiguous.

6. Another key theme, from across groups, was that considering the 'efficiency' of new wind farms should not be limited to Section 36 consents guidance but should equally apply to developments considered under the Town and Country Planning (Scotland) Act 1997.

7. A further major theme related to larger turbines, often linked to remarks regarding their relative efficiency. Some respondents commented that they would welcome more explicit encouragement that larger turbines should be used where possible whilst others highlighted concerns regarding landscape and environmental impacts if larger turbines are deployed in the interests of seeking greater efficiency.

8. Respondents commented on the need to better align the objectives and issues within the draft Onshore Wind Policy Statement with planning policy.

9. There was support for transforming the grid, and in particular reformation of the grid charging structure. Some respondents suggested that the Scottish Government might facilitate discussions to assist in easing grid connection infrastructure or incentivising schemes away from a traditional model of supply to the grid i.e. storage. These measures were identified as routes to reducing costs.

10. There was support for the open tender process for any Power Purchase Agreements (PPA) provider to help support community energy or small-scale projects and also for local energy systems to facilitate local generation, storage and use.

11. Several respondents, notably from the onshore wind industry group, cited the importance of the Scottish Government continuing its lobbying efforts with the UK government to secure long term Contracts for Difference (CfD) for onshore wind**.** Other issues particularly highlighted by respondents from the onshore wind industry group related to significant increases in planning application fees and business rates, both of which are felt to adversely affect developers' costs at a time of reduced subsidy.

Main Findings: Repowering

12. 45 respondents agreed with the Scottish Government's approach to repowering while five did not. A key theme was agreement with the Scottish Government's support for the principle of repowering and that repowering will be important to achieving energy targets.

13. Many respondents favoured the commitment that repowered sites should continue to be assessed on their own merits and be sited and designed to minimise environmental impacts and protect residential amenity. In addition, several respondents commented specifically that they welcomed reference to the role for and / or guidance from Scottish Natural Heritage (SNH).

14. A number of comments and questions relating to planning in connection with repowering were each raised by small numbers of respondents. Some respondents from the local authorities and planners group as well as the onshore wind industry suggested that a review of the main technical and planning issues associated with re-powering, together with guidance, would be beneficial for all stakeholders.

Main Findings: Developing a Strategic Approach to New Development

15. There were mixed responses to the question 'Do you agree or disagree with the proposals to pursue option 3. A 'locally co-ordinated approach'?' 22 respondents agreed, particularly those in the environmental and energy advisory group, public sector / delivery agency / regulators, local authorities and planners as well as individuals. 26 respondents disagreed, including 15 from the onshore wind industry group.

16. The key themes from those who disagreed with the proposal focused primarily on competitive commercial interests, confidentiality issues and differing time-plans / schedules. The main themes from those respondents who agreed with the proposal reflected the benefits highlighted in the draft Onshore Wind Policy Statement. Suggested areas of local co-ordination that might reduce costs in the development process included access, grid and radar mitigation.

17. When asked whether they agreed with continuation of the Scottish Government's 'business as usual' approach, 33 respondents agreed and 14 disagreed. The highest incidence of agreement came from within the onshore wind industry and the local authorities and planners groupings.

18. A key theme was that the system had worked well thus far and would continue to deliver projects that would help the Scottish Government to achieve green energy targets. Despite this support, a further major theme, both from those agreeing and from those who neither agreed nor disagreed, was that some modifications or further improvements could be made.

Main Findings: Barriers to Deployment

19. 33 respondents agreed with the Scottish Government's proposal to facilitate a strategic approach to the access to, and the cost of using, data from civil aviation radar to mitigate impacts of wind development on civil aviation operations. Six respondents disagreed.

20. The main themes related to hope that the proposal will lead to more wind schemes proceeding and that the costs of radar mitigation solutions have been a barrier.

21. 25 respondents, predominantly from the onshore wind industry, agreed with the Scottish Government proposal that the exclusion zone round the Eskdalemuir array should be set at 15 km. Four respondents disagreed.

Main Findings: Protection for Residents and the Environment

22. There were some generally supportive comments on the Peatland Policy Statement and/or the carbon calculator. However, many respondents, particularly from the onshore wind group, suggested that the carbon calculator and peat map do not add any significant value to the consenting process.

23. There were comments in this section on other issues in the consultation including wind farm impacts, house prices and electricity networks.

Main Findings: Community Benefits

24. There was widespread comment that the Scottish Governement's Good Practice Principles on community benefits from onshore renewable projects have had a positive impact.

25. A key theme, from across respondent groups, was support for the idea that new community benefit packages may be required to reflect new business models. Respondents from the onshore wind industry commented particularly that the community benefit package needs to be revised in line with subsidy reductions.

26. Another main theme was support for continuing to deliver community benefits in some form going forward.

27. A relatively large number of respondents felt that community benefits packages were being delivered, although a small number felt this was not always the case or were more equivocal in their views.

Main Findings: Shared Ownership

28. A relatively common theme here is that lack of skills and resources can be barriers to shared ownership schemes. Whilst the support provided by the Community and Renewable Energy Scheme (CARES) was noted by some respondents, it was a relatively common theme that additional support from government is needed. The main emerging themes regarding further support related to funding and to ensuring provision of a range of advice, including technical, commercial and financial.

1. Introduction

Background

1.1. The Scottish Government consultation on a draft Onshore Wind Policy Statement was one of a number of consultations published alongside the draft Energy Strategy.

1.2. The draft Onshore Wind Policy Statement reaffirmed the Scottish Government's existing onshore wind policy and the consultation asked for views on a number of issues relating to supporting the sector. It ran from 24 January until 30 May 2017.

Respondent Profile

1.3. There were 89 responses to the consultation: 77 from organisations and 12 from individuals. Respondents were assigned to respondent groupings in order to enable analysis of any differences or commonalities across or within the various different types of organisations and individuals that responded.

1.4. A list of all those organisations that submitted a response to the consultation and agreed to have their response published is included in Appendix 1. The following table shows the numbers of responses in each analysis group.

	Respondent Groups
	Number
Aviation specialists	4
Communities	3
Environmental and energy advisory (non-governmental)	6
Public Sector / Delivery Agency / Regulator	7
Land / Landscape	2
Lobby and interest groups	4
Local authorities and planners	16
Onshore wind industry	35
Total organisations	**77**
Individuals	12
Total respondents	**89**

1.5. The onshore wind category includes wind farm developers and generators, manufacturers and engineers. The environmental and energy advisory grouping comprises solely non-governmental organisations and is simply referred to as the 'environmental and energy advisory' category throughout the body of this report. The organisation categories with the highest numbers of respondents were 'onshore wind industry' and 'local authorities and planners'.

Methodology

1.6. Responses to the consultation were submitted using the Scottish Government consultation platform Citizen Space or by email or hard copy.

1.7. It should be borne in mind that the number responding at each question is not always the same as the number presented in the respondent group table. This is because not all respondents addressed all questions; some commented only on those questions or sections of relevance to their organisation, sector or field of interest. The report indicates the number of respondents who commented at each question.

1.8. Some respondents did not use the consultation questionnaire and, instead, presented their views in a report or letter format. Wherever possible, researchers assigned relevant sections of these documents to the relevant questions in order that all comments on similar issues could be analysed together.

1.9. Some of the consultation questions contained closed, tick-boxes with options for 'Yes or No' or 'Agree or Disagree'. Where respondents did not follow the questions but mentioned clearly within their text that they agreed or disagreed with a point, these have been included in the relevant counts.

1.10. The researchers examined all comments made by respondents at each open question and noted the range of issues mentioned in responses including reasons for opinions, specific examples or explanations, alternative suggestions or other related comments. Grouping these issues together into similar themes allowed the researchers to identify whether any particular theme was specific to any particular respondent group or groups. When looking at group differences however, it must be also borne in mind that where a specific opinion has been identified in relation to a particular group or groups, this does not indicate that other groups did not share this opinion, but rather that they simply did not comment on that particular point.

1.11. While the consultation gave all who wished to comment an opportunity to do so, given the self-selecting nature of this type of exercise, any figures quoted here cannot be extrapolated to a wider population outwith the respondent sample.

1.12. A small number of verbatim comments, from those who gave permission for their responses to be made public, have been used in the report to illustrate themes or to provide extra detail for some specific points.

2. Main Findings

2.1 The introduction to the consultation sets out the case for onshore wind, reaffirming the Scottish Government's support for its deployment, whilst protecting the environment and residential amenity and maximising local benefits. The introduction includes data relating to the projected levelised costs of onshore wind to 2030 compared with the cost of a Combined Cycle Gas Turbine (CCGT) gas station. It also affirms the importance of onshore wind to the Scottish Government's decarbonisation ambitions.

Route to Market

Q2.1. What is your view on the appropriate approach for the inclusion of wind farm efficiency as a material consideration in the Section 36 consents guidance?

2.2. Comments on this question came from 76 respondents, across all respondent groups. A very large proportion of those who commented either explicitly stated or implied support for the inclusion of wind farm 'efficiency' as a material consideration in the Section 36 consents guidance. However, a major theme in responses, from across groups and particularly the onshore wind industry, was that 'efficiency' is either difficult to define or, potentially, ambiguous.

2.3. A wide variety of comments and suggestions were put forward as to the most appropriate definition of 'efficiency', including arguments both for and against load / capacity being used as a measure. Some respondents also noted that turbine 'efficiency' should not be the sole measure and that, for example, transmission costs should be taken into account. There were also comments that at the development planning stage it can be difficult to accurately determine likely capacity since estimates may need to be used in any calculation.

2.4. A number of respondents from across groups, and particularly local authorities and planners, noted agreement with the stated need for 'all applications continuing to be assessed on their own merits' or highlighted the importance of balancing 'efficiency' considerations with cumulative environmental and landscape impacts.

2.5. Some respondents suggested that the sector has now reached a stage of maturity where only commercially viable or 'efficient' proposals are likely to be put forward by developers.

2.6. Another key theme to emerge in comments at this question, again from across groups, was that considering the 'efficiency' of new wind farms should not be limited to Section 36 consents guidance but should equally apply to developments considered under the Town and Country Planning (Scotland) Act 1997.

2.7. A number of respondents from across groups commented at this question that national guidance would be welcomed on how 'efficiency' should be defined and assessed. A respondent from the onshore wind industry commented: "It should be noted from the outset that some members are concerned with the terminology of 'efficiency'. (The respondent), therefore, welcomes the opportunity to further explore this proposal in detail through the suggested working group to ensure unintended consequences are avoided and the measure supports the development of onshore wind in Scotland."

2.8. Another respondent from the onshore wind industry indicated willingness to be part of the Scottish Government's working group on "efficiency" to assist in this respect. A small number of respondents noted that guidance should take account of, or allow for, future technological developments.

2.9. Some respondents also commented that efficiency should be assessed on a site by site basis and a few commented specifically that they would not favour a 'threshold for wind efficiency' for new developments.

2.10. The final major theme emerging at this question related to larger turbines, often linked to remarks regarding their relative efficiency.

- Some respondents highlighted increased concerns regarding landscape and environmental impacts if larger turbines are deployed in the interests of seeking greater efficiency.
- Some respondents commented that they would welcome more explicit encouragement that larger turbines should be used where possible.
- There was comment that larger turbines are an issue that the Scottish Govenment needs to tackle more directly.
- A small number of comments suggested that the statement that 'larger turbines are only an option where these would be appropriate when assessed against all other factors' seems contradictory to comments in relation to a 'smarter planning system' approach which is felt to suggest that larger turbines will be the default position.
- Some respondents noted that developers with existing applications, sometimes longstanding, should not be disadvantaged on a competitive basis because of new or changing technologies that might be considered more 'efficient'.

Q2.2. In this chapter, the Scottish Government has identified three areas of activity where it can offer support to a route to market for onshore wind – do you agree with the issues identified?

2.11. Comments on this question came from 67 respondents, across all respondent groups. A small number of these respondents indicated broad agreement with the issues identified by the Scottish Government. A relatively large proportion of those who commented took the opportunity to reiterate the views they had expressed at the earlier question regarding the inclusion of 'efficiency' as a material consideration in the Section 36 consents guidance.

2.12. Over and above points raised at the earlier question, many themes emerged in relation to planning or Smarter Planning specifically:

- The importance of involving local communities and taking heed of their views in the planning process was emphasised in some responses.
- Some respondents noted the importance of planning policy and guidance encouraging innovation and keeping pace with emerging technology.
- It was suggested that a streamlined planning process would be helpful in reducing delays to new developments and some respondents commented on lack of resource within planning authorities. The view was also expressed that a more consistent national approach might help to streamline the process, albeit taking account of local needs and the views of local communities.
- Some respondents referred to the Scottish Government's recent consultation on the future of the planning system 'Places, People and Planning' and their responses to that consultation.
- There was a suggestion that consideration should be given to the location of new developments relating to localised points of high energy demand.

2.13. A number of respondents commented on the need for efforts to be encouraged regarding energy storage and improved transmission to facilitate a sustainable approach in progressing to a low carbon economy. There was support for transforming the grid, and in particular reformation of the grid charging structure.

2.14. There was support for the open tender process for any Power Purchase Agreements (PPA) provider to help support community energy or small-scale projects and also for local energy systems to facilitate local generation, storage and use.

2.15. The recognition of the role of longer-term corporate PPAs as well as PPA provision under a 'sleeve arrangement' within the national collaborative contract was welcomed by a small number of respondents, albeit the PPA market for onshore wind was felt by some to be too small to facilitate the scale of onshore wind development that is currently required.

Q2.3. How can the Scottish Government, with the powers available to it, further facilitate a route to market for onshore wind?

2.16. Comments on this question came from 59 respondents, across respondent groups. The themes were relatively fragmented and sometimes referenced or reiterated comments at other questions in the consultation.

2.17. Once again there were several references to planning, covering an array of topics including the need for greater emphasis on responsiveness and resources to deal with onshore wind development and the need to better align the objectives and issues within the draft Onshore Wind Policy Statement with planning policy. Wild land areas (WLAs) were cited by a number of respondents in the onshore wind industry, as well as lobby and interest groups, as a topic of concern or contention with regard to onshore wind developments.

2.18. Grid connection was cited by some respondents as a barrier to onshore wind development and it was suggested that the Scottish Government might facilitate discussions to assist in easing grid connection infrastructure or incentivising schemes away from a traditional model of supply to the grid i.e. storage. These measures were identified as routes to reducing costs.

2.19. Several respondents, notably from the onshore wind industry group, cited the importance of the Scottish Government continuing its lobbying efforts with the UK Government to secure long term Contracts for Difference (CfD) for onshore wind. Some specifically commented on the benefits of making representation to the UK Government for a Pot 1 allocation round allowing access to Scottish mainland onshore wind projects in the next year or two. There were also suggestions of the Scottish Government establishing a Scotland specific CfD.

2.20. Other issues particularly highlighted by respondents from the onshore wind industry group related to significant increases in planning application fees and also increased business rates, both of which are felt to adversely affect developers' costs at a time of reduced subsidy. It was also suggested by one respondent that the proposed costs of aviation mitigation appear unjustifiably high.

2.21. A small number of comments related to Power Purchase Agreements (PPAs):

- Suggestions that the Scottish Government ensures through the public sector contract that PPAs support community ownership of renewables and provide opportunities for community owned and shared ownership projects to be part of a bid. One respondent suggested there should be a supportive role for community groups and small scale projects in tendering for a sleeving bid through Local Energy Scotland.
- Suggestions of a role for the Scottish Government in educating and facilitating collaboration between onshore wind generators and corporates on the benefits of long-term corporate PPA contracts in order to encourage take-up.
- A suggestion that the structure of PPAs could be simplified to reduce multiple, complex and costly contract arrangements.
- A respondent in the local authorities and planners group sought clarity over what is meant by community and small scale energy producers 'sleeving' their energy.

Repowering

Q3.1. Do you agree with the Scottish Government's proposed approach to repowering?

2.22. As can be seen in the following table, far greater numbers of respondents agreed with the Scottish Government's proposed approach to repowering than did not. 45 agreed while five did not (three individuals and two respondents from the onshore wind industry). 25 respondents made comments without explicitly agreeing or disagreeing.

Question 3.1

	Yes	No	Other comment	No reply
Aviation specialists (4)	1	-	1	2
Communities (3)	2	-	1	-
Environmental and energy advisory (non-governmental) (6)	3	-	3	-
Public Sector / Delivery Agency / Regulator (7)	4	-	2	1
Land / Landscape (2)	2	-	-	-
Lobby and interest groups (4)	2	-	1	1
Local authorities and planners (16)	11	-	5	-
Onshore wind industry (35)	15	2	12	6
Individuals (12)	5	3	-	4
Total (89)	**45**	**5**	**25**	**14**

2.23. A total of 68 respondents opted to make comments at this question; responses came from across all sub groups.

2.24. 38 of the respondents who answered 'yes' added further comments. In the main, their comments reiterated their agreement with the Scottish Government's support for the principle of repowering and also stated a belief that repowering will be important to achieving energy targets.

2.25. For example, an onshore wind industry respondent commented: "we very much agree that the repowering of existing wind farm sites is going to become a form of development that the consenting system will require to deal with as the very early stage wind farms start to come to the end of their operational lives. We also agree that repowering of existing sites will also become fundamental to the Scottish Government to realising their renewable energy generation targets in particular, in order to underpin long term renewable energy and emissions reduction targets".

2.26. Many respondents favoured the commitment that repowered sites should continue to be assessed on their own merits and be sited and designed to minimise environmental impacts and protect residential amenity. Several commented specifically that they welcomed reference to the role for and / or guidance from Scottish Natural Heritage (SNH).

2.27. A small number of the respondents who answered 'yes' added caveats or additional points, some of which were common in nature to those from respondents who commented without giving a 'yes' or 'no' answer. These included:

- Concerns regarding the precise meaning and interpretation of the mentioned steer in Scottish Planning Policy (SPP), which states that areas identified as suitable for onshore wind should be suitable in perpetuity.
- Concern at Scottish Planning Policy's (SPP) reference to consent "in perpetuity". Also, specific concern that the SPP suggestion that areas identified for new proposals be sited for use in perpetuity does not assist onshore wind developments granted permission before the current version of SPP.
- A need to clarify the weight that is to be given to a 'proportionate approach' that takes proper account of environmental and community interests.
- There may be additional issues in relation to larger turbines, which will need to be considered in the planning process.
- The approach to section 36 consents guidance should also be applied to wind farm applications determined under Town and Country Planning legislation.
- Concern at the mention of calls for a streamlined planning and consenting process.
- New shared ownership / community benefit agreements should be negotiated for repowered sites.
- That the role of local authorities, interest groups, Scottish Environment Protection Agency (SEPA) and others should be recognised at a local level, in addition to recognition of the role of SNH.
- Concern at a presumption of a windfarm continuing on a site as some existing wind farm sites were accepted, or recommended and consented, because impacts were regarded as "temporary" i.e. for a 25 year period.
- A request that, in the final policy statement, a distinction is made between the different types of proposals which may be brought forward.
- Concern regarding site reuse impacts on peatland.
- Concern that "repowered" sites should go through the full aerodrome safeguarding process to determine what the impact of such alterations may be.

2.28. The comments from the small number of respondents who answered 'no' included a suggestion that technological developments, and larger turbines specifically, will create differences in scale that may make planning approval impossible. In contrast, one respondent felt that although impacts should be assessed there should be a more streamlined process than treatment as a new site. There was some support for planning permission lasting more than 25 years.

Q3.2. Are there any further means by which repowering proposals might be facilitated?

2.29. Comments on this question came from 48 respondents across sub-groups. Many of the points raised at the previous question were reiterated, particularly in relation to assessment of sites on their merits and the need for up-to-date design and environmental assessment processes. There were some suggestions of a presumption in favour of re-development / re-use in planning policy.

2.30. The benefits of early discussions and collaboration with developers, local authorities, communities and other stakeholders were mentioned by some respondents in the public sector / delivery agency / regulators, local authorities and planners and communities groups. There were suggestions that a period of five to ten years prior to planning expiry would be an appropriate intervention point.

2.31. In addition, a respondent from the environmental and energy advisory group suggested that a collective approach to repowering should be encouraged given that repowering of one wind farm could impact on others nearby through affecting both the wind resource available to them and local grid's capacity.

2.32. Some respondents from the local authorities and planners group and the onshore wind industry suggested that a review of the main technical and planning issues associated with re-powering, together with guidance, would be beneficial for all stakeholders.

Developing a Strategic Approach to New Development

Q4.1. Do you agree or disagree with the proposals to pursue option 3, a 'locally co-ordinated approach'? Please provide reasons to support your answer.

2.33. As can be seen in the following table, 22 respondents agreed with the proposal to pursue option 3, a 'locally co-ordinated approach' and 26 disagreed. The highest incidence of agreement was evident within the environmental and energy advisory group, public sector / delivery agency / regulators, local authorities and planners as well as individuals. 15 respondents in the onshore wind industry group disagreed and only one agreed, with a further 12 making comments without explicitly agreeing or disagreeing with the proposals to pursue option 3.

Question 4.1

	Agree	Disagree	Other comment	No reply
Aviation specialists (4)	1	-	1	2
Communities (3)	1	1	-	1
Environmental and energy advisory (non-governmental) (6)	3	1	1	1
Public Sector / Delivery Agency / Regulator (7)	4	1	1	1
Land / Landscape (2)	-	1	1	-
Lobby and interest groups (4)	-	2	-	2
Local authorities and planners (16)	6	3	7	-
Onshore wind industry (35)	1	15	12	7
Individuals (12)	6	2	1	3
Total (89)	**22**	**26**	**24**	**17**

2.34. A total of 71 respondents opted to comment at this question; responses came from across all sub groups. The main themes in comments from those respondents who agreed with the proposal to pursue option 3, a 'locally co-ordinated approach', reflected the benefits highlighted in the draft Onshore Wind Policy Statement. Some respondents noted that some of these already happen. Suggested areas of local co-ordination that might reduce costs in the development process included access, grid and radar mitigation. Some respondents commented that shared infrastructure can help reduce environmental impacts.

2.35. A number of respondents that agreed with the proposal questioned where responsibility should lie for facilitating negotiations between developers. Suggestions included Scottish Government, the local development planning forum, the Scottish Government Energy Consents and Deployment Unit (ECDU), external agents or an approach along similar lines to 'areas of coordinated action' involving

dialogue between developers, the planning authority and key agencies. Several respondents noted the importance and value of involving local communities in the early stages, particularly in encouraging shared ownership.

2.36. The key themes emerging from those who disagreed with the proposal to pursue option 3, a 'locally co-ordinated approach', focused primarily on competitive commercial interests, confidentiality issues and differing time-plans / schedules. Some commented, however, that there might be potential for better coordination on some issues post-consent and some commented that there is already co-ordination in place where appropriate and practical.

2.37. Two respondents from the lobby and interests group, as well as respondents from public sector / delivery agency / regulators, local authorities and planners and land / landscape groups, expressed some disappointment that Scottish Government rejected a spatial approach or felt there was potential for an appropriate spatial approach. In contrast, some onshore wind industry respondents agreed that a spatial approach should not be pursued.

2.38. 34 respondents who had not explicitly agreed or disagreed with the proposal made comments at this question. Many of the themes that emerged were broadly similar to those outlined above in relation to both advantages and disadvantages of a local co-ordinated approach.

Q4.2. Do you agree or disagree with continuation of the Scottish Government's 'business as usual' approach (option 4)? Please provide reasons to support your answer.

2.39. As can be seen in the following table, 33 respondents agreed with continuation of the Scottish Government's 'business as usual' approach (option 4) and 14 respondents disagreed. The highest incidence of agreement came from within the onshore wind industry and the local authorities and planners groupings. 19 respondents, mostly from the onshore wind industry grouping, made comments without explicitly agreeing or disagreeing.

Question 4.2

	Agree	Disagree	Other comment	No reply
Aviation specialists (4)	1	-	-	3
Communities (3)	1	-	1	1
Environmental and energy advisory (non-governmental) (6)	1	1	1	3
Public Sector / Delivery Agency / Regulator (7)	1	1	1	4
Land / Landscape (2)	-	1	1	-
Lobby and interest groups (4)	-	1	2	1
Local authorities and planners (16)	7	4	4	1
Onshore wind industry (35)	17	2	9	7
Individuals (12)	5	4	-	3
Total (89)	**33**	**14**	**19**	**23**

2.40. A total of 63 respondents opted to comment at this question; responses came from across all sub groups.

2.41. The key theme from those that agreed with continuation of the Scottish Government's 'business as usual' approach was that the system had worked well thus far and would continue to deliver projects that would help the Scottish Government to achieve green energy targets. One or two respondents commented again here that there are already instances of cooperation and coordination between developers.

A number of those agreeing with the 'business as usual' approach suggested possible modifications or improvements they felt would be beneficial, sometimes related to greater coordination post-consent. Several respondents who made comments at this question without explicitly agreeing or disagreeing also felt improvements could be made.

2.42. The comments from those who disagreed with continuation of the Scottish Government's 'business as usual' approach were relatively fragmented. A number of respondents repeated comments made at the previous question, either indicating support for a national spatial approach or repeating support for a locally co-ordinated approach.

2.43. There were a small number of comments regarding the threshold for wind energy applications for section 36 determinations. A respondent from the local authorities and planners group suggested an increase from the current 50MW to in the region of 200MW. In contrast, a respondent from the public sector / delivery agency / regulator group suggested the threshold for consenting new developments might be reduced to less than 50MW. There was some comment again at this question that the process for <50MW is in need of review and that the focus should not be solely on section 36 determinations.

Barriers to Deployment

Q5.1. Do you agree with the Scottish Government proposal to facilitate a strategic approach to the access to, and the cost of using, data from civil aviation radar to mitigate impacts of wind development on civil aviation operations?

2.44. As can be seen in the following table, 33 respondents agreed with the Scottish Government proposal while 6 respondents disagreed and 11 made other comments.

Question 5.1

	Agree	Disagree	Other comment	No reply
Aviation specialists (4)	1	1	1	1
Communities (3)	-	-	-	3
Environmental and energy advisory (non-governmental) (6)	2	-	-	4
Public Sector / Delivery Agency / Regulator (7)	1	-	-	6
Land / Landscape (2)	2	-	-	-
Lobby and interest groups (4)	-	-	1	3
Local authorities and planners (16)	5	-	4	7
Onshore wind industry (35)	18	3	5	9
Individuals (12)	4	2	-	6
Total (89)	**33**	**6**	**11**	**39**

2.45. 45 of these respondents added further comments on this question.

2.46. This number included 28 of those who agreed with the Scottish Government proposal to facilitate a strategic approach to the access to, and the cost of using, data from civil aviation radar to mitigate impacts of wind development on civil aviation operations.

2.47. The main themes emerging from those who agreed with the proposal included:

- General supportive comments;
- A hope that the proposal will lead to more wind schemes proceeding;
- Comments that costs of radar mitigation solutions have been a barrier.

2.48. There were, however, some comments that costs could still be a barrier, including up-front and operational costs (for example, costs of mitigation for legacy radar infrastructure).

2.49. Other continuing barriers, mentioned by a small number of respondents agreeing with the proposal, included:

- Timely access to grid connections;
- Cost considerations for remote locations;
- Current approaches to turbine lighting;
- Radar data feed requirements.

2.50. Whilst the consultation question focussed only on civil aviation radar, some respondents commented on the need for wind farm-friendly Ministry of Defence air traffic control and defence radar as well as civilian air traffic control radar, with a comment that this may need changes to some regulations. There were also comments that the commercial interests of civilian aviation should not be considered in planning applications.

2.51. Respondents also stressed the need for early engagement in the planning process, with the Ministry of Defence as well as civilian aviation, and there were suggestions that the Scottish Government should facilitate engagement and discussion on this and on other wind farm-related aviation issues. There was comment that with regard to the Ministry of Defence, there should be focus on issues such as air traffic control, air defence and Spadeadam.

2.52. All 6 of those who disagreed gave their reasons and these included; that radar mitigation has become a commercial venture for some aviation interests; that the impact of wind turbines on aviation has been exaggerated; and, as seen in comments from those agreeing, the need for wind farm tolerant radar.

2.53. 10 respondents did not explicitly agree or disagree with the proposal but included comments on this subject. An aviation respondent detailed their long standing and proactive engagement with the wind industry, and other stakeholders, in trying to resolve any issues. They detailed their own strategic approach and commented on issues around different airports employing different approaches. This respondent felt that the cost of aviation mitigation is not unreasonable and that it has not impacted on most wind farm developments.

2.54. Other respondents commented on the need for a strategic geographic approach; one said that radar deployment needs to be considered strategically. There were requests for more detail on how accessing civilian data would work in practice, and on the actual costs of radar mitigation.

2.55. The need for the Scottish Government to be involved in cost allocation was also mentioned.

2.56. One onshore wind industry respondent commented on other barriers that, they said, had not been considered in the consultation. These included ‘route to market’, consent issues and a lack of up to date guidance.

Q5.2. Do you agree with the Scottish Government proposal that the exclusion zone round the Eskdalemuir array should be set at 15 km?

2.57. As can be seen in the following table, 25 respondents agreed with the Scottish Government proposal that the exclusion zone round the Eskdalemuir array should be set at 15 km, 4 disagreed and 9 made other comments.

	Agree	Disagree	Other comment	No reply
Aviation specialists (4)	2	-	1	1
Communities (3)	-	-	-	3
Environmental and energy advisory (non-governmental) (6)	1	-	-	5
Public Sector / Delivery Agency / Regulator (7)	-	-	1	6
Land / Landscape (2)	-	1	1	-
Lobby and interest groups (4)	-	-	-	4
Local authorities and planners (16)	2	-	1	13
Onshore wind industry (35)	18	1	5	11
Individuals (12)	2	2	-	8
Total (89)	**25**	**4**	**9**	**51**

2.58. 30 respondents commented on this question including 17 of those who agreed with the proposal. Several of these respondents commented on their membership of the Eskdalemuir Working Group.

2.59. Most of the comments simply reiterated support for the proposal. Other comments included:

- The need for a regular review of noise budget allocation.
- That this proposal may allow for more developments in the area.
- The need for a list or map of developments in the area.

2.60. The four respondents who disagreed also commented giving their reasons. These included:

- Whether such an exclusion zone is supportable in the longer term.
- That the exclusion zone should be set at 10km.
- That the number and viability of projects located within 10-50km should be reviewed before making a decision.

2.61. There were comments in 9 other responses with a variety of queries, concerns or suggestions, including:

- That that every wind farm should be modelled on its own merits.
- The need for regular reviews of the situation.
- That the exclusion should not apply to the 5/15/35 kW small-scale turbines which support farm diversification and business efficiency.
- That a greater number of turbines may be constructed to meet the noise budget, increasing development pressure in the 15-50km zone.
- That not enough consideration has been given to larger turbines.
- That increasing the development exclusion zone from 10km to 15km may prevent substantial amounts of capacity and reduce the overall generation available within the area.

Protection for Residents and the Environment

Q6.1. Do you have any comments regarding our Peatland Policy Statement and the functionality and the role of the carbon calculator?

2.62. 39 respondents commented on this question; several gave generally supportive comments on the Peatland Policy Statement and/or the carbon calculator.

2.63. Many, however, raised queries or concerns, including a number of respondents from the onshore wind group that felt that the carbon calculator and peat map do not add any significant value to the consenting process (although one from this group felt that the carbon calculator does add value).

2.64. The main themes to emerge from other responses were:

Peatland Policy Statement:

2.65. A lobby and interest group respondent included a detailed list of concerns and recommendations about the draft Peatland Policy Statement.

2.66. Several other respondents raised concerns about the draft Peatland Policy Statement, including:

- That the statement is too broad or general.
- The need for the Policy to reference possible mitigation methods where peat disturbance is a factor.
- The need for consideration of peat disposal or positive uses of peat.
- A comment that the absorption of CO_2 is insignificant compared with CO_2 savings from renewable energy projects.
- Disagreement with the implication that peatlands must remain unchanged.
- The need for some flexibility or the need for a case by case examination of areas.
- Concern that peatland issues being split across three different agencies may lead to an inconsistent approach; a suggestion for a single agency to take responsibility.
- That with so much policy on a range of issues it is becoming easy to find grounds for objecting to a development.

2.67. Reservations were expressed regarding the carbon and peatland map on the SNHi Information Service. Comments included:

- Concern over the methodology used to produce the combined carbon rich soils/ deep peat / priority peatland habitat map.
- That the mapping used is not helpful.

Carbon calculator

2.68. Comments included:

- That this is less useful than the previous version at design stage but more useful during planning.
- That the online version is less user friendly than the previous spreadsheet version.
- That carbon calculations should have to be submitted for all onshore wind developments (although one local authority respondent pointed out that these are submitted at face value and are not assessed).
- That the carbon calculator should take into account the whole lifecycle of a development and elements outwith the immediate proposal.
- That the carbon calculator is only understood by specialist consultants and so is of limited use.
- That the purpose of the carbon calculator is not clear and that there needs to be guidance on what constitutes a 'good' or 'bad' carbon payback period.

2.69. An individual submitted a lengthy and detailed response about the role and functionality of the carbon calculator and on the Draft Peatland and Energy Policy Statement.

Residential amenities

2.70. In addition to those who commented on the Peatland Policy Statement and carbon calculator, 17 respondents also commented here on other issues in consultation including wind farm impacts, house prices and electricity networks.

2.71. There were comments, particularly from the onshore wind industry, that the impact of development on house prices has never been recognised as a consideration in the planning system and that there is no evidence that onshore wind farms have any impact on house prices in Scotland. It was also suggested that considering the use of community benefit funds to provide compensation to residents seemed neither necessary nor appropriate. A local authority respondent suggested that impacts on house prices are a key concern.

2.72. Several respondents queried why there had been no further detail or questions on the residential amenities section or why there had been no discussion of a wide range of other natural and cultural heritage interests.

Community Benefits

Q7.1. Are our Good Practice Principles for community benefits from onshore renewable energy developments doing what they set out to achieve?

2.73. Comments on this question were noted in 52 responses, from across all groups. One key theme in these comments was that the Scottish Government's Good Practice Principles on community benefits from onshore renewable projects have had a positive impact.

2.74. A second key theme, from across respondent groups, was support for the idea that new community benefit packages may be required to reflect new business models. Respondents from the onshore wind industry commented particularly that the community benefit package needs to be revised in line with subsidy reductions.

2.75. The third key theme was support for continuing to deliver community benefits in some form going forward.

2.76. Other recurring themes, albeit from relatively small numbers of respondents, included:

- The importance of a clear distinction being made, and understood, that benefit and compensation are not the same thing and that benefit should not be perceived as a 'bribe'.
- Pre-empting the next questions, one or two respondents commented on a need to ensure that where benefits are agreed they are actually delivered.

Q7.2. Are packages of community benefits that were agreed in partnership with communities, being delivered in practice?

2.77. 51 respondents from across groups commented at this question.

2.78. A majority of those who commented, particularly those from the onshore wind industry, felt that agreed community benefits packages were being delivered. Onshore wind industry respondents often cited their own projects as examples of effective delivery of community benefits and some referenced data to support this.

2.79. A small number of respondents from the onshore wind industry, local authorities and planners group and individuals felt it was not always the case. One or two respondents in the onshore wind industry group linked any failures to transfer of projects or failure of successor owners to deliver benefits that had previously been agreed.

2.80. Other respondents, particularly in the local authorities and planners group, were slightly equivocal about the extent to which benefits are consistently delivered or did not have experience or evidence on which to base any judgment. A small number suggested that research or monitoring in this respect would be helpful. Comments included:

- That community benefit is being delivered but to different models, which is perceived to complicate matters for communities;
  That some communities are benefiting significantly, while others are not;
- That many communities lack the support or direction in how to invest the funds that are accruing;
- That communities are mainly receiving benefit from larger schemes;
- That some communities feel that smaller schemes (such as FiT schemes) should also deliver community benefit, particularly where there are perceived cumulative impacts in some areas;
- That scope to integrate community benefits for wind-farm development with other local community benefit programmes should be highlighted.

2.81. Some respondents noted the benefits of support to communities e.g. in developing community action plans or setting up agreements.

Shared Ownership

Q8.1. If you represent, or are a member of, a community, are you interested in shared ownership and what do you think are the barriers to achieving shared ownership under a renewable energy scheme?

2.82. 31 respondents from across respondent groups made comments at this question, including three respondents from the communities group; two of these suggested that there is interest in shared ownership but that lack of skills and resources can be barriers to shared ownership schemes. Several respondents from other groups echoed this theme and one respondent in the environmental and energy advisory group offered feedback from workshops, which also suggested that while interest in shared ownership was high the complexities presented barriers. This respondent detailed suggestions as to how the Scottish Government might further assist and simplify the process.

2.83. The support provided by the Community and Renewable Energy Scheme (CARES) was praised by several respondents from different groups, although it was a relatively common theme that additional support from government is needed; some comments focused specifically on raising finance / funding. A respondent in the local authorities and planners group suggested 'a central hub or focal point could be provided by the Scottish Government whereby interested individuals, groups or communities could seek advice or support'.

2.84. A theme from a small number of respondents related to the treatment or consideration of shared ownership in a planning context. Some respondents from the onshore wind industry highlighted the resources needed to promote the concept of shared ownership and with no guarantee that communities will take up the opportunity. There were suggestions regarding the ways and stages at which the offer / failure to offer or take-up of shared ownership might become a material consideration.

Q8.2. What steps can the Scottish Government take to improve the prospect of further shared ownership development?

2.85. 46 respondents commented on this question. The main emerging themes related to funding and to ensuring provision of a range of advice, including technical, commercial and financial. There was also some suggestion that there is a role for the Scottish Government in creating initial awareness of the options for communities or facilitating discussion between developers and communities.

2.86. A number of respondents suggested the possibility of a Scottish Government Renewable Bond as a means of communities obtaining the necessary funding to invest in a Shared Ownership scheme. A few respondents also commented on the importance of maintaining funding for CARES and Renewable Energy Investment Fund (REIF). A reduction in the rate of REIF funding or the provision of an Enterprise Finance Guarantee was suggested as was relief on business rates for shared ownership projects.

3. Other Comments

3.1. 37 respondents made additional comments.

3.2. Many provided additional information, such as background information about their organisation, or added their thanks for the opportunity to comment. Some provided examples of projects and data relating to those projects.

3.3. Many also reiterated that they welcome the Scottish Government's continued support for onshore wind as well as recognition of its significance in achieving future targets.

3.4. There was additional comment on the use of larger turbines from several respondents, which largely reflected themes identified earlier in this report.

3.5. There was further comment from several respondents on the need for integration between energy strategy and the planning system and the requirement for a supportive planning process.

4. Consultation

At the end of the questions, respondents were asked if they would like to provide feedback in order to help improve future consultations and this section outlines the findings from these responses.

How satisfied were you with this consultation?

4.1. Of those providing an answer, more respondents (26) were satisfied with the consultation than were dissatisfied (4):

- 11 said they were 'Very satisfied'
- 15 said they were 'Slightly satisfied'
- 8 said they were 'Neither satisfied nor dissatisfied'
- 3 said they were 'Slightly dissatisfied'
- one said they were 'Very dissatisfied'

4.2. Only 11 respondents provided any additional commentary and comments included:

- The need to include somewhere to comment on areas outwith the scope of the questions.
- The need for an alternative to agree / disagree.
- That the consultation did not contain enough detail to allow informed answers.
- That some of the questions were presumptuous.
- That the consultation was well structured.
- The need to update respondents with outcomes.
- The need to better publicise consultations.

How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?

4.3. Of those providing an answer, more respondents (30) were satisfied with the consultation than were dissatisfied (2):

- 19 said they were 'Very satisfied'
- 11 said they were 'Slightly satisfied'
- 6 said they were 'Neither satisfied nor dissatisfied'
- 2 said they were 'Slightly dissatisfied'
- No respondents said they were 'Very dissatisfied'

4.4. Only 8 respondents provided any additional commentary; some related to the consultation and are included above, others related to issues with wind farms and broadband.

Appendix A: Respondent organisations

Respondent organisations
Aberdeen City Council
Aberdeenshire Council
ABO Wind UK Ltd
Arcus Consultancy Services Ltd
Argyll and Bute Council
Atmos Consulting Limited
Aviation Investment Fund Company Limited
Banks Renewables
Brookfield Renewable UK Limited
Changeworks
Comhairle nan Eilean Siar
Community Energy Scotland
Coriolis Energy Limited
Defence Infrastructure Organisation – Ministry of Defence
Dumfries and Galloway Council
E.On
East Renfrewshire Council – Planning Service
EDF Energy
Eishken Ltd
Engie
ESB Asset Development UK Ltd
Falkirk Council
Force 9 Energy

Foundation Scotland
Fred Olsen Renewables Ltd
Glasgow Airport Limited (GAL)
Green Cat Renewables Ltd
Heads of Planning Scotland
Highlands and Islands Enterprise (HIE)
Historic Environment Scotland
Hoolan Energy
Infinergy Ltd
Innogy
John Muir Trust
Jones Lang LaSalle
Landscape Institute Scotland
Local Energy Scotland
Muirden Energy LLP
Muirhall Energy
National Trust for Scotland
North East Mountain Trust
RenewableUK
RES
RSPB
RTPI Scotland
Scottish Borders Council
Scottish Communities Climate Action Network
Scottish Land & Estates

Scottish Natural Heritage
Scottish Power
Scottish Renewables
Scottish Water
SEPA (Scottish Environment Protection Agency)
Siemens Gamesa Renewable Energy
South Lanarkshire Council
Southdean Community Council
Statkraft UK Ltd
Stirling Council
The Highland Council
The Independent Renewable Energy Generators Group (IREGG)
Vestas Celtic Wind Technology
West Dunbartonshire Council
West Lothian Council
Wind Farm Analytics Ltd
Zero Waste Scotland
2020 renewables
7 Organisations responses withheld (although named above)
12 individuals

social research

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