SUBMISSION FROM MINTO HILLS CONSERVATION GROUP (MHCG)

TARGETS

*Has the Scottish Government made any estimation of the overall costs of achieving the targets, and identified which parties will bear them?*

‘Overall costs’ in any such estimation need to include visual impact and health costs to local people, particularly those living within sight and sound of turbines but also those who see or hear them regularly due to work/travel. These might be measured for instance by counting the number of objectors who live within 2, 3, 4, 5k distance of a turbine, as well as the proportion of the total number of people who have objected who live within those distances, and perhaps doing the same for zones of theoretical visibility.

The same should apply to power lines, of which the Beauly to Denny line is only the longest so far. Since this is being built largely to carry wind-farm electricity closer to the populated central belt, the impact on nearby residents is a cost of achieving the Government’s targets. The national grid requires many other, albeit shorter power lines, to be built to connect to wind turbines. All of these must be included in the cost, both in terms of construction/maintenance and impact on residents and landscape.

There is an acknowledged lack of independent, objective analysis relating to the effect of the sound of turbines on the health of people living or working nearby¹. This should include academic combined clinical and acoustic investigation, including longitudinal studies involving quantification of total exposures to sound energy and its characteristic (modulation) in the infrasound and low frequency noise ranges. Scotland, as the country in the UK with the highest density of turbines, has a moral duty to its citizens to commission independent research on this.

Costs to tourism should also be estimated and these estimates cannot necessarily be based on the most recent research commissioned by the Scottish Government since the effect of proliferation and the extension of wind farms into more populated areas than previously has not yet been measured. The mistake which some commentators appear to have made is to rely on the lack of evidence to support a claim that the cost to tourism is negligible. The converse may yet be proven, albeit too late. Visit Scotland should be tasked with running an iterative survey amongst all operators seeking feedback from tourists on wind turbines. This has to include proactively inviting views from all tourists, not just samples, since the experience will be different in different landscapes, weather conditions and times of day. The fact that data such as this could be easily gathered has not yet been, on this scale, suggests that the Government is reluctant to face the results.

Ecological costs should be calculated and organisations such as the John Muir Trust are well-placed to offer estimates of these. Valid evidence can also be garnered from organisations more closely linked to Government sponsorship, like Scottish National Heritage, but, as with their inputs to
planning processes, it must be borne in mind that they are reliant for their existence on the public purse. Independent advice needs to be sought by the Committee during this inquiry.

The other huge cost which few people have yet identified let alone mentioned is the cost of the damage to social cohesion in rural communities, with neighbours and sometimes even families bitterly divided over objection to or support of wind farms in the locality. Again, some measure of this might be gleaned from recorded objections/support.

All of these costs will be with us for generations and it may be that another category of people will pay a significant cost because of this cumulative effect. Those MSPs promoting a rush for wind energy that the country cannot bear will inevitably suffer in the next Parliamentary elections.

CHALLENGES

Technology

Is the technology to meet these targets available and affordable? If not, what needs to be done?

The submission already lodged from Professor D Jane Bower, on the need to revisit the assumptions on which Scotland’s targets are based, is highly relevant. She points out that recent technological and engineering developments elsewhere in the world have made future oil and gas energy supplies within western democracies more secure and affordable. Hers is not a lone voice in the field of science, technology and commerce: we need to keep abreast of the rest of the world or we will be left behind with outdated technology, producing electricity which is too expensive for our own consumption and for potential customers elsewhere. Even if carbon-based energy supplies will run out eventually, the message today must be that the Scottish Government can and must now revise in its target growth rate for renewable energy the light of new information.

We know that the technology to make other forms of renewable energy affordable will develop over the years up to 2020: there is no point therefore in putting all our eggs into the onshore wind turbine basket if we can survive comfortably with cheaper forms of carbon energy until then.

PLANNING AND CONSENTS

Is the planning system adequately resourced and fit for purpose?

One indication that the planning system may not be adequately resourced is the fact that some local authority officers such as landscape architects appear to be unable, because of rapidly increasing workload, to give adequate time to each application in order to deliver sufficiently comprehensive scrutiny. This state of affairs leaves the Scottish Government open to accusations that it suits it to have planning authorities stretched in this way.
Speeding up planning processes, as proposed by the First Minister following his task force review in February 2012, is not the answer: that would only succeed in giving less protection to Scottish citizens.

Many local residents complain that they don’t know about wind farm applications until it is too late either to object or support. We submit that wind turbine siting is so much more affecting to residents than most other planning matters that mandatory postal notification to residents for these specific planning applications needs to be extended to a much, much wider radius than the 20m which applies at present. Current practice is clearly based on urban planning, where most built development has taken place up till recently. Non-domestic wind turbines in rural landscapes have an impact of several times magnitude greater than a garage extension or even a telecoms mast. Zones of theoretical visibility can be imprecise and subject to disagreement. We therefore suggest at least 5 kilometres since all residents within that radius will certainly be affected by any wind turbine over 10m height. This would end the scenario where neighbouring residents find out about planning applications only by word of mouth and then become objectors solely on the grounds of being apparently ignored by developers and planning authorities.

How can national priorities be reconciled with local interests?

The Scottish Government’s record on appeals against local authority planning refusals for wind turbines appears to reflect an unheralded importation of a Westminster policy proposal. The Coalition Government’s intention that planning authorities should presume in favour of economic development has become the adopted practice of the Scottish Government without any of the consultation or challenge which was evident south of the Border. Members of the public watching the repeated over-turning of local authority decisions by Reporters might be forgiven for wondering how Reporters, paid for and appointed by the Scottish Government, can possibly be independent. Our independent Scottish judicial system is capable of appointing, overseeing and remunerating Reporters without any influence from the government of the day and so should be resourced to do this, hypothecated from fees submitted by developers.

Appeal systems must not only be fair but be seen to be fair.

Another case in point is the status of designated/restricted areas in appeals. To aid developers Scottish Borders Council, to its credit, has published a map of its area showing its graded assessment of suitability for wind farm development. Reporters have paid scant regard to this in considering appeals. Likewise the Areas of Great Landscape Value and their successors the embryonic Special Landscape Areas need to be afforded a higher degree of relevance than at present when appeals are considered. The contrast with the capital city is stark. Edinburgh is built on seven hills but anyone wishing to see the type of industrial scale wind turbines which are filling the uplands (and now the lowlands also) of the Highlands and the south of Scotland would have to travel a very long way from Holyrood.
Scottish planning guidelines indicate that 2 kilometres is the critical distance when wind turbine proximity to receptor dwellings is considered by planning authorities, yet developers and even Reporters appear to ignore this repeatedly. We appreciate that planning legislation does not currently allow a complete prohibition on wind turbines being sited within this 2k (although the Scottish Parliament might want to review this) but we feel that this guideline is being ignored to such an extent that it brings into question the value of national guidelines per se. The Committee may wish to question Ministers and officials closely on this point. The Australian Waubra Foundation recommends a precautionary 10k distance until there is greater understanding of medium and long term health hazards.

When is saturation point reached? Surely planning authorities should be permitted to assess and identify this point for a given area? The Scottish Borders Council area has the second highest density of operating and consented turbines per square kilometre in the UK after Powys and the second highest number of such turbines after Highland. Electricity produced from wind farms in the Scottish Borders is enough to supply all of its households 9 times over, therefore this area exports 8 times as much electricity as its residents need. So people living in the Borders must suffer these windfarms without any gain for 25 years so that more people elsewhere can subsidise mostly foreign companies for operating them.

The Scottish Government’s promotion and encouragement of community benefits is perhaps the most insidious aspect of its policy on renewable energy. Superficially, the idea appears to be eminently egalitarian, but the design and reality are closer to the kind of bribery and corruption endemic in countries where democracy is less established than in Scotland. We should be ashamed of this policy and throw it out immediately. The idea that either developers or the communities whom they target really believe that the incentives offered by the former to the latter do not influence the way in which members of that community (or their community council) react to the planning application concerned, is laughable. The proposal to link community benefits to planning applications would put into statute what already appears to be Government-sanctioned bribery.

In a moral world, community benefits if they persist at all should be negotiated and disbursed only after a planning decision has been made and only by elected bodies such as community councils. Anyone who claims, as we do, that this would not work because developers could disregard community benefits after obtaining planning consent, is admitting an undeniable truth. This is that the intention of developers, in the current practice of negotiating benefits for a community prior to a planning decision, is to buy some acquiescence from part of the community to be affected.

The existence of this policy is a clandestine admission by Government that communities living close to wind farms suffer.
ACCESS TO FINANCE

What will be the impacts on consumers and their bills?

Not only are residents in rural areas most likely to be nearer wind farms and power lines than urban dwellers (and so suffer the costs outlined above under ‘Targets’) but in Scotland they are twice as likely to experience fuel poverty as urban residents. Also people in rural areas are more likely than townspeople to have to rely on electricity for heating because of the scarcity of mains gas supply and the excessive costs of oil. The increases in costs to electricity consumers caused by their subsidising of the producers of renewables therefore disproportionately increases average household running costs for rural residents. Data for electricity users, including those most reliant on electricity, is available for all of Scotland so should be included in both the calculation of costs of renewables and the identification of ‘which parties will bear them’.

Electricity-reliant businesses in every part of Scotland will also suffer through increased running costs. Many may be forced to close. An independent survey needs to be conducted of all businesses, perhaps by the CBI, to estimate the aggregate effect of the predicted increases in electricity bills.

Nevertheless, many electricity consumers are being led to believe, intentionally or otherwise, that living near wind farms will make their electricity cheaper. This is because developers of renewable energy express their existing or planned contributions to targets by referring to the number of households which production could supply with electricity. Parliament and Government both have a duty to dispel the myth that this will mean cheap local electricity so that local communities can decide on support or objection to wind farms on the basis of facts.

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ii Ibid
iii Calculated from data provided by Renewables UK
iv Data obtained from Planning Dept, Scottish Borders Council
v Southern Reporter, 19 January 2012, p9
vi The Fuel Poverty Monitor, published 28 September 2011. (This is an ‘Annual Report’ on the problem of fuel poverty across the UK. It is written by experts from the UK’s leading fuel poverty charities, including Energy Action Scotland.) See: http://www.nea.org.uk/assets/PDF-documents/Monitor-2011-small.pdf