SUBMISSION FROM NTA (NO TIREE ARRAY)

NTA members are Tiree stakeholders opposed to the consent of the currently proposed Tiree (Argyll) Array. See www.no-tiree-array.org.uk

Targets

Are the 2020 renewables targets (for electricity and heat) achievable? If not, why not?

No. They are a politicians fantasy with little or no foundation on technical analysis and scrutiny. See Inst of Mech Eng :- (http://www.imeche.org/scottish-energy-2020)

What contribution will achievement of the 2020 renewables targets make to meeting Scotland’s CO2 emissions targets (a reduction of at least 42% by 2020 and an 80% reduction target for 2050) under the Climate Change (Scotland) Act 2009?

Very little.

This is also a very stupid question. This would be analogous to asking what contribution will the achievement of Sport Scotland’s 2020 Targets make to Scotland’s Gold Medal Target for the 2020 Olympics under the Sports Scotland Act 2009.

As with the gold medal analogy, in the absence of imposing unifying international standards, CO2 emission targets are vacuously aspirational.

Unless there is a binding international agreement with draconian sanctions what one nation does /achieves is an irrelevancy. Co2 emissions are an international issue therefore Scotland’s aspirations are an international irrelevancy. Fossil based fuel sources will remain the worlds primary and cheapest energy source and resource.

Scottish Government’s renewable policy with its imbalance and over reliance on wind ignores the back up requirement which can only derived from fossil, nuclear and lesser renewables. The No Nuclear policy of Scottish Govt suggests Renewables Myopia and confirms that current policy is not based on rational scientific and technological analysis, but founded in political dogma.


http://www.adamsmith.org/blog/energy-environment/renewable-energy-vision-or-mirage

Will increase in demand from electric heat and transport be offset by efficiencies elsewhere?

No. This is cloud cuckoo stuff. In a parochial Scottish context some offsets may be possible but in an international context the economic development of eg BRIC (Brazil/Russia/India/ China) and its impact on the energy market, in the last decade
confirms this to be a silly question. Once more this is a politically driven aspiration to suggest the current fiscal imposition to afford Scottish Govt energy policy will have some aspirational longer-term contra accounted fiscal benefit.

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

Manifestly not, otherwise you would not be asking the question.!!!

Challenges

(a) Technology

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

The technology is available but not affordable. Huge subsidy is the only motor influence on technological advance. In the current economic climate this is madness. This is confirmed by both Spain and Holland suspending subsidy policy. Overnight projects have been mothballed.

What needs to be done is;- (1) adopt the engineered approach recommended by the Inst of Mech Eng see; http://www.imeche.org/scottish-energy-2020

(2) Consider investing in carbon capture and associated ‘saving’ schemes. The auto industry and the oil industry are classic examples of an industries investing, without subsidy, in a ‘cleaner ‘product.

Are electricity generating or heat producing technologies compatible with the need for security of energy supplies?

NO, they are only part of much bigger, broader energy supply scenario. There is little point in having all the electricity and heat production you require if you don’t have the oil to run your transport, or import your raw materials and in turn export your products. In the same way as that memorable day in Dec 2010 when every wind turbine was switched off, and, but for fossil fuel back up the UK would have come to a halt.

This is about balance to minimise a “security risk “ it is not about the need to seek total security of energy supply . The latter is unattainable, and an intangible concept. If it is not then why does Scottish Government assume its current policy will benefit Scotland by the “ export potential “ of Scottish Wind?

Are our universities and research institutes fully geared up to the need for technological development, innovation and commercialisation?

NO. It has been Govt policy, since the 60’s to de-industrialise the UK economy ,hence any attempt to re-invent itself will have to be subsidised and imported. This is evidenced by Alex Salmond daily opening /welcoming companies like Gamesa/Mitsubishi/Dooyang etc etc . .
(b) Supply chain and infrastructure.

Stet

Is the supply chain in Scotland in place to meet the targets?

Stet

What further improvements are needed to the grid infrastructure or heat supply networks both at a national and a local level?

See: JMT final rev submission re transmission to SA Comms 02 02 12

Additionally, are we confident that the necessary infrastructure can be developed and financed so that Scotland can export any excess electricity generated to the rest of the UK and/or the EU? What is the role for the Scottish Government here?

This begs the obvious question as to why Scottish Government is investing in achieving an export capacity. If the infrastructure does not exist to distribute future domestic supply/meet domestic consumption then it certainly does not exist for “export”.

The Scottish Government is culpable of imposing a costly energy strategy with a conceptual export potential but has not produced
(1) a business plan
   nor
(2) any market research
   nor
(3) details of the export pricing mechanism
   nor
(4) any documentation to support its viability or cost effectiveness

NTA has asked these questions of both Alex Salmond Scottish Government and Reform Scotland and as yet not received any substantive reply
(see Powering Scotland. Published by Reform Scotland 13 Dec 2011)

(c) Planning and consents

Is the planning system adequately resourced and fit for purpose?

It is not just adequately resourced, it is grossly over-resourced.

Government wants to ram its Renewables policy through irrespective of any critical input. Statutory consultees are with rare exception Govt Bodies eg SNH. Advisory quangos are packed with representatives of Govt Bodies and Developers. Some consultees have been emasculated from input (eg Visit Scotland). There is growing evidence that planners are genuflecting to central government and ignoring local input. For example with regard to Tiree when the Developer SPR was asked in the event of 100% Community objection by every Man Woman Child of the community would the
proposed Array go ahead replied confidently and simply with “YES. if it got the required L&C consent “. There is no provision in the L&C process to register such objection prior to consent.

There is tacit support from local council to developers prior to any planning application. See SPR /Argyll and Bute Concordat.

The so called Community benefit is an obvious Bribe to both Council and community to facilitate consent and minimise objection. If such proposed payment were a feature of the planning system with regard to other development projects, there would be a demand for a public enquiry into possible bribery/corruption and undue influence.

There is a total lack of scrutiny by the consenting authority of a developer fulfilling L&C obligations. The implied assumption is the developer would not risk a default. If this had any intellectual credibility then why as a nation do we require and implement “Drink Drive Legislation“?

The suggestion by Prof Griggs as below suggests an obvious weakness of the planning system

From:

RENEWABLES ROUTEMAP SHORT LIFE TASK FORCE ON STREAMLINING ENERGY DEVELOPMENT LICENSING AND CONSENTS

First Meeting – Atlantic Quay, Glasgow – 28 October 2011

MEETING NOTE

For example, multi-stakeholder discussions prior to planning applications being submitted, led by someone outside who all parties would regard as independent.

For all the above reasons the planning system is NOT fit for purpose

How can national priorities be reconciled with local interests?

(1) By adopting Prof Griggs suggestion as above
(2) Government to respect any public consultation as opposed to regard it as a “ticking the box “exercise.

Scottish Government's consultation on off shore wind was a sham

(d) Access to finance

Will sufficient funds be available to allow investment in both the installation and the development of relevant technologies?
One either has faith in the market or not and if the policy is financially sound then the Market will invest. Government subsidy distorts the Market therefore distorts financial judgement.

The assumption that Government would never allow a bank to fail, totally distorted lending criteria with the ensuing banking crash and its disastrous consequences. Take heed.

What can the Scottish Government do to influence this?

Why should it? If Govt is selling a pup why should it use tax payers funds to do so. If Government sells a pup then it is failing in its duty of care to taxpayers.

What will the impacts be on consumers and their bills?

Inexorable price rises and extended fuel poverty [REF on Fuel Poverty]

(e) Skills and workforce development

□ Will Scotland have sufficient home-grown skills to attract inward investment? NO Are current policies producing the desired move towards Science Technology Engineering and Maths subjects at schools and universities? NO Is the skills transfer from the oil and gas sectors being realised? NO

This is an import culture and regime. Demand currently exceeds supply in what is an international labour market

(f) Energy market reform and the subsidy regime

Are the reforms of the energy markets and subsidy regimes at both UK and EU level sufficient to meet the challenge of the Scottish Government’s renewable targets?

Begs the obvious question.. why should they? Scottish Govt’s Renewables targets have to be a ‘stand alone’ policy with its own merit to encourage market reform and investment and not require subsidy regime reform to meet its self imposed challenges

Why is Scottish Government making demands of UK government and the EU to facilitate Scottish government to meet the challenges of Scottish Governments Renewables targets when those targets are not required or demanded by either UK Government or the EU?

Submitted on behalf of NTA by Robert Trythall  secr NTA
29 February 2012