SUBMISSION FROM RAMBLERS SCOTLAND

Ramblers Scotland welcomes the opportunity to make a written submission to the Committee’s Inquiry into Renewable Energy Targets. We would be happy to discuss this submission further with the Committee if invited to give evidence. The questions posed by the Committee are indicated in red text.

Remit

“An inquiry into the achievability of the Scottish Government’s 2020 renewable energy targets, the merits of the targets and what the risks and barriers are to realising them.”

Ramblers Scotland believes that while global climate change and energy security issues need to be addressed, with urgency, the way this is being done at present is damaging Scotland’s overall environmental quality and reputation.

The Ramblers Scotland position on energy policy is as follows:

- We support the need to make massive changes in lifestyles and energy use to help prevent human induced climate change.
- We consider that the development of renewable energy sources, greater efficiencies in energy use and energy conservation should be key aspects of current and future energy policy.
- We do not consider that the development of nuclear energy sources is necessary to meet Scotland’s energy requirements.
- We accept that the development of a low carbon economy will initially require increased financial costs to society but we regard present arrangements, notably the Renewables Obligation, as wholly inadequate. It does not provide a balanced support to the full range of renewable technologies and is inequitable in the way that it imposes a financial burden on those least able to meet the costs.
- The Scottish Government does not appear to give serious consideration to the relationship between energy and transport policy. The use of fossil fuels for transport needs to be reduced through changing spending priorities, at national and local level, so that a minimum of 10% of all transport budgets is directed towards the development of non motorised transport, notably cycling and walking, rather than the 1% which has been the norm for many years. This would help to bring Scotland up to the standard adopted by other modern European nations.

The main issues that Ramblers Scotland finds with the implementation of current renewable energy targets are as follows:

- Government policy is focussing too much on supporting renewable electricity generation through one technology - large-scale, land based wind turbine developments.
- Modern wind turbines are now too large to be able to fit comfortably into most landscapes, visually dominating surrounding views.
- Upland habitats are often sensitive to change and slow to recover, displaying a lasting legacy of visual scars.
• Landscape and outdoor recreation are essential considerations when striking a balance between conserving the natural and cultural heritage, and using it as an economic resource.
• Damaging upland landscapes with heavy engineering projects like wind turbines is inappropriate.
• There has been minimal consideration given to the potential impacts on the tourism industry as a result of large scale onshore wind farm development. We believe that the present situation is seriously threatening Scotland’s reputation as a country with world famous natural beauty. This is likely to significantly diminish the numbers of people who choose to come to Scotland to enjoy our scenery and outdoor recreation opportunities.

In addition, we do not believe that enough emphasis is given by the Scottish Government on energy conservation and energy efficiency, which are the most sustainable options for the long term. Ramblers Scotland notes the conclusions of a previous Scottish Parliamentary Inquiry (Environment & Rural Development Committee 2005, Inquiry into Climate Change) which stated that 40% of energy could be saved and half of the 60% CO2 reduction target for 2050 could be achieved cost-effectively by improved energy efficiency. No significant progress seems to have been made since then in recognition of the Committee’s concerns.

Targets
• Are the 2020 renewables targets (for electricity and heat) achievable? If not, why not?
• 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?
• Will increase in demand from electric heat and transport be offset by efficiencies elsewhere?
• Has the Scottish Government made any estimation of the overall costs of achieving the targets, and identified which parties will bear them?

The target for 100% of Scotland’s electricity generated by renewables is laudable, but by setting the target for 2020 the result has been a rush to onshore wind, with the development of ever larger onshore wind farms, along with their accompanying vehicular tracks and connecting pylons, spreading across large areas of the country. Potential wind farms are now being scoped in sites which are more and more marginal, with notable cases of applications on the boundaries of our two national parks and situated right in the heart of wild landscapes. Opposition from national and local interests and from politicians of all parties is growing apace.

We believe that there should be a major shift in energy policy towards offshore windfarms, wave and tidal power, household energy generation through photo-voltaics or combined heat and power, and a huge campaign to reduce the demand for energy and change the behaviour of the Scottish population.

Challenges
(a) Technology
Is the technology to meet these targets available and affordable? If not, what needs to be done?

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

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

(b) Supply chain and infrastructure

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

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

(c) Planning and consents

Is the planning system adequately resourced and fit for purpose?

How can national priorities be reconciled with local interests?

The current situation has led to a loss of local democracy, since government targets frequently appear to over-ride objections that local authorities or local communities may voice.

There may be a case for some large wind turbine developments in some locations in Scotland. We suggest these would be in association with existing large scale industrial complexes or dockland areas. Such areas should be identified with a presumption against planning approval for large scale turbines in all other locations on land.

Better planning guidance is needed for offshore windfarm development. Minimum distances should be set between the shoreline and development location, perhaps up to ten miles. There should also be a preference for developments to be located away from areas recognized as having special seascape value. This implies a preference for offshore developments to be located off the east rather than west coast of Scotland.

Planning authorities, public agencies, local communities and interest groups are overwhelmed by the number of planning applications for windfarm development that are coming forward. There is a “Klondike” atmosphere created almost entirely by a subsidy regime that encourages any would-be developer to try their hand at getting planning approval for massive wind turbines.

The levels of financial support that developers are able to offer local communities in order to persuade local communities to support windfarm developments is little short of bribery to get planning approval. The integrity of the planning system is at stake.

Furthermore the amounts of annual payments being made to local communities are so great that we hear that local communities do not know what to do with all the money they are receiving on an annual basis. We cannot understand why very small numbers of local
communities should be receiving such payments when the overwhelming majority are receiving nothing, because they are not adjacent to a windfarm, and everyone is paying for this generosity towards a few communities through their increased electricity bills.

(d) Access to finance
☐ Will sufficient funds be available to allow investment in both the installation and the development of relevant technologies? What can the Scottish Government do to influence this?
☐ What will the impacts be on consumers and their bills?

(e) Skills and workforce development
☐ Will Scotland have sufficient home-grown skills to attract inward investment? Are current policies producing the desired move towards Science Technology Engineering and Maths subjects at schools and universities? Is the skills transfer from the oil and gas sectors being realised?

(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?

Ramblers Scotland believes there should be a review of subsidy regimes to encourage developers to move away from onshore wind farms and invest in offshore wind, wave and tidal technologies. It should be accepted that there will be increased costs with offshore wind development, but equally a recognition that in the long term this will provide the most efficient way of harvesting wind energy given the greater consistency of wind flow over the sea.

Consideration should be given to the complete removal of subsidy for large scale onshore windfarms. Only then will developers be sufficiently encouraged to invest in other forms of renewable energy development. A revised subsidy regime should also provide greater support for small scale onshore wind turbines, in which the height of turbines in no greater than 50 metres to the vertical blade tip, with eligibility for such subsidy being restricted to farmers, crofters, local community groups and individual householders and commercial properties. Such a change in subsidy should be accompanied by new planning guidance which restricts small scale turbine development to locations which have minimum nature conservation and landscape value and least impact on local residents.

Ramblers Scotland considers that some investigation is required into whether the provision of public subsidy for renewable energy development is best achieved through the Renewables Obligation or whether some other mechanism, such as the introduction of a “green tax” as part of general taxation arrangements might be more appropriate. The present arrangements appear to lay the greatest burden for supporting renewable energy developments on those least able to afford it. We cannot understand why the UK Government appears content to allow huge numbers of people to be driven towards situations of fuel poverty, and commercial enterprises being made less viable, as a result of increased electricity costs arising from the Renewables Obligation. The primary beneficiaries of this policy are large landowners, many of whom live outwith Scotland, the multinational energy companies and some local communities living close to windfarm
developments. The situation can be summed up simply as “never in the history of public subsidy has so much been given to so few for so little public benefit”. It would be far better for the costs of renewable energy development subsidies to be met through taxation so that the greatest financial burden falls upon those best placed to meet these costs.

Ramblers Scotland
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Ramblers Scotland is the representative body for walkers in Scotland with around 6,500 members in Scotland and 120,000 across Great Britain. We are recognised by sports.scotland as a governing body of sport. We work to promote walking for the health and pleasure, to safeguard public access to land and to protect the natural beauty of the countryside.