

# Response ID ANON-U1HE-16PG-H

Submitted to **Consultation on a Draft Onshore Wind Policy Statement**

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## About You

### What is your name?

**Name:**

Dr Theodore Holtom

### What is your email address?

**Email:**

theodore.holtom@wind-farm-analytics.co.uk

### Are you responding as an individual or an organisation?

Organisation

### What is your organisation?

**Organisation:**

Wind Farm Analytics Ltd

### The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

**We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?**

Yes

## Questions

### 2.1 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?

**What is your view on the appropriate approach for the inclusion of windfarm efficiency as a material consideration in the Section 36 consents guidance?:**

Including efficiency is not helpful and can be misleading. There is risk that planners would exaggerate efficiency if it is used as a discriminator. It is in the interests of investors to deliver efficient projects anyway and they are the ones who need correct estimation of productivity and cost effectiveness. But productivity and cost effectiveness are not just down to efficiency. Anyway efficiency of wind farms is not the same concept as efficiency of fossil fuel plant because the wind resource is free and will never run out.

### 2.2 In Chapter 2, 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?

**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?:**

There needs to be more emphasis on encouraging pumped hydro energy storage. Wind energy needs large scale energy storage. Therefore it must be cheap large scale energy storage and a low carbon method. Therefore it must be pumped hydro since there is no viable competitor.

This can be proven by setting up competitive auctions for 28 hours storage with multiple GW of power capacity with the auction bids on the basis of support price per MWh installed energy capacity. Allow any form of energy storage to enter. At present time pumped hydro will certainly win but by all means allow other technologies to try and compete.

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

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

Please ensure that pumped hydro facilities have the right to buy curtailment energy at zero cost for free pumping instead of allowing curtailment energy to be dumped; establish competitive auctions to bid for energy storage power capacity with a minimum of 24 hours energy storage for the given power capacity; reduce planning burden on pumped hydro energy storage on the basis of its national strategic importance for managing periods of significant excess wind or lack of wind and thereby eliminating energy security risk due to uncontrollability of wind/weather.

Furthermore Scottish govt can introduce a pure green hydrogen market requiring hydrogen to be produced by electrolysis from renewable energy installations

such as wind farms in order to decarbonise transport – only pure hydrogen pipelines will achieve the cheap transport of hydrogen for use by hydrogen fuel cell vehicles since they require pure hydrogen; therefore pure green hydrogen pipelines should be established.

Scottish cities should require all new buses to be hydrogen buses running on green hydrogen; Scottish vehicle fleet operators of large size should be required to use green hydrogen vehicles in future; Scottish ferry operators should be required to employ green hydrogen ferries; this will establish Scotland as a leader in green hydrogen economy and Scottish wind farms earn extra revenue from producing green hydrogen from locally abundant natural wind resource and locally abundant water.

### **3.1 Do you agree with the Scottish Government's proposed approach to repowering?**

No

#### **Comments::**

I don't agree that repowering is all that it is cracked up to be from a technical efficiency or from an economic standpoint in terms of efficient deployment of capital and effort. In general an operating wind farm has already had the investment and is producing energy for free. Efficiency is unimportant since there is no fuel cost or pollution.

However, I do agree that planning permission lasting more than 25 years such as 50-100 years will be very helpful, especially when considering that pumped hydro energy storage assets will last for 50-100 years and these are particularly helpful for managing wind energy.

### **3.2 Are there any further means by which repowering proposals might be facilitated?**

#### **Are there any further means by which repowering proposals might be facilitated?:**

My suggestion would be that planning permission and consents for wind farms should be allowed for greater than 25 years on condition that the wind farm includes co-located energy storage of power capacity greater than 50% of the installed wind capacity and with at least 8 hours time duration (any logical means of energy storage should be permitted including pumped hydro, batteries and production of green hydrogen) – for instance a 100 MW wind farm could have consent for 50 years provided that energy storage of at least 50 MW power storage capacity was co-located and having at least 8 hours duration, ie at least 400 MWh total energy storage capacity. It should be noted that lengthening the duration of a wind farm planning consent from 25 years to 50 or 100 years is a give away of a license to generate money and therefore it is fair to combine this significant bonus with a responsibility to provide energy storage for grid stability and assisting Scotland's eventual transition to zero carbon energy system. It is important to be clear whether the land owner or the existing wind farm asset owner should directly benefit from an extension of planning consent and bear in mind that the original planning applicant may have sold the wind farm project.

### **4.1 Do you agree or disagree with the proposals to pursue option 3. A 'locally co-ordinated approach'?**

Disagree

#### **Please provide reasons to support your answer::**

I am not convinced that government should play a part in a locally coordinated approach. How does one define "local"? If there are strong grounds for coordinating then companies can make their own agreements to do so.

### **4.2 Do you agree or disagree with continuation of the Scottish Government's 'Business as usual' approach (option 4)?**

Disagree

#### **Please provide reasons to support your answer::**

I think there is merit in continuing business as usual on the basis of past success of Scottish onshore wind deployment – if it ain't broke, don't fix it! However, I would recommend tuning the system to encourage or incentivise all developers (not just the uncompetitive big players!) to co-locate energy storage with future and existing wind farms.

### **5.1 Do you agree or disagree with the SG 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?**

Disagree

#### **Please provide reasons to support your answer::**

The strategic approach to radar stakeholders should be to tell them to stop bleating about wind farms and to emphasise to them that in Scotland we have something called rain which causes far more radar clutter than any wind farm and yet aeroplanes manage to fly through rain right? Furthermore passenger aircraft have transponders which are identifiable despite clutter; furthermore wind turbines are on the ground or very close to it; furthermore the locations of wind turbines are well known and their coordinates can be easily programmed into all relevant systems so that if the RAF cannot manage to survive in the presence of well known location stationary located wind turbines how will they ever defend us against an actual enemy, and what if it rains? For too long the wind industry has been badgered by these exaggerated claims of the impact of wind turbines and the reason is obvious that they just want the wind industry to pay for new radar upgrades.

### **5.2 Do you agree or disagree with the SG proposal that the exclusion zone round the Eskdalemuir array should be set at 15km?**

Agree

#### **Please provide reasons to support your answer::**

No comment except that it is obvious the seismic spectrum from wind turbines is quite different from that of nuclear explosions, therefore this noise should be possible to filter out. But clearly a treaty must be respected so if we have to fulfill obligations on that basis then so be it.

## 6.1 Do you have any comments regarding our Peatland Policy Statement and the functionality and role of the carbon calculator?

### Do you have any comments regarding our Peatland Policy Statement and the functionality and role of the carbon calculator?:

The policy should emphasise the possible mitigation methods in case that peat disturbance is a factor. It should be noted that the absorption of carbon dioxide from the air in one year is insignificant compared with the CO2 savings of renewable energy projects. The carbon sequestered within a cubic metre of peat may be more significant for large quantities of peat. However, this carbon content within the peat does not immediately and entirely evaporate when digging peat out of a hole and moving it somewhere else. Therefore it should be possible to simply move the peat, preferably using this peat for nearby peatland restoration. In this case there is little or no detrimental effect in terms of carbon dioxide emission. In conclusion strategic energy installations should not be stopped on the grounds of carbon content of peat. No comment on peat carbon calculator except that it is quite detailed.

## 7.1 Is our Good Practice Principles for community benefits from onshore renewable energy developments doing what it set out to achieve?

### Is our Good Practice Principles for community benefits from onshore renewable energy developments doing what it set out to achieve?:

Community benefits are not the field of expertise of WFA. I can see positives in terms of engaging with the local community, awareness of what renewable energy achieves, a sense of involvement and even well-being, and after all a kind of compensation for possible impacts of the development. Probably these are the positive effects which the policy on community benefits sets out to achieve. However, is there not a danger that these community benefits are perceived as bribery and therefore corrupt? If the policy is intended to encourage deployment of renewable energy schemes is there not a danger that the expectation of community benefit payment becomes an undue additional tax on the renewable energy industry which actually disincentivises investment. A normal business, for instance a fish and chip shop, does not have to pay community benefits over and above normal business rates, etc. Are gas power stations paying community benefits to local communities whilst they pump out pollution into the air we breathe?

## 7.2 Are packages of community benefits that were agreed in partnership with communities, being delivered in practice?

### Are packages of community benefits that were agreed in partnership with communities, being delivered in practice?:

No comment. I don't know.

## 8.1 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?

### 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?:

We are all a member of a community! I am interested in community ownership of renewable energy but I live in the inner city of Glasgow. The definition of "local community" is unclear – is this a radius of 2 kilometres to the project, or is it the nearest 1000 residents; there are obvious variations in population concentration. And there is a lack of consistency between schemes. Air pollution and climate change affects all of us globally, irrespective of whether we live near the generating facility. Current community ownership suffers when aimed at limited numbers of "local" people who may have limited funds to invest compared with project investment of millions or hundreds of millions of pounds.

## 8.2 What steps can the Scottish Government take to improve the prospect of further shared ownership development?

### What steps can the Scottish Government take to improve the prospect of further shared ownership development?:

Everyone should have equal opportunity to invest in profitable wind farms whereas there is an ongoing hoovering up of the wind farm assets by the financial elite and savvy investors who obviously aim to deploy their capital logically and invest in profitable schemes, who can blame them? Meanwhile old age pensioners, financially unsophisticated or small time savers without trading accounts are getting ripped off by banks paying close to zero interest on savings accounts. Why don't we have a nationally publicised saving rate of 5% based on revenue from community CFD projects. The 5% rate should be accessible for every citizen of the country. It could be possible to limit the annual input as for an ISA savings account. It can be a kind of "CARES-Green-ISA" or "Scottish-Green-ISA". It could be a kind of medium term bond but small savers may need instant access account options, so other financial designs can be possible – surely the financial whizzkids in Edinburgh or elsewhere could come up with a good scheme so that ordinary people can get a decent return on their logical investments. It might be better if all participating shared ownership funds would be a common national fund so as to avoid any kind of local bias to projects in relation to local wealth and local population concentration. The participating projects need only pay the interest rate of 5% to the scheme on any funds received from the scheme, plus a small administrative charge which should be kept to a minimum such as 0.25%, typical in efficient fund management. The overall fund can be a central pot applied nationally in proportion to the MW capacity of participating generation schemes.

## Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

### Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

### Please enter comments here.:

Thank you for your work.

### Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

### Please enter comments here.:

Thank you.