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Onshore Wind Policy Statement Refresh 2021: Consultative Draft

On behalf of the Scottish Wild Land Group, I wish to submit the following response to the consultative draft.

1. This is a technical document and one which takes the stance that the only way forward is to increase the amount of on-shore wind capacity. There is no reference to its limitations. The document does not address the issue of consented wind farms which have not been built. Why give consent for more when they might also not be constructed?
2. The document uses the statement “cheap and reliable” to describe on-shore wind power. We would disagree with that. Generation could also be moved off-shore as the recent ScotWind bidding would provide all the capacity required.
3. Wind is, by its nature, a variable resource so however many turbines exist, if there is no wind, then there will be no power generation. The document does not consider the costs associated with this or the lack of storage capacity.
4. The document states:

“Scotland's most cherished landscapes are a key part of our natural and cultural heritage and must be afforded the necessary protections.”

While we agree with this comment, we note there is no further indication

of how this is to be achieved so it seems to be simply an aspirational statement. We feel that our world-class landscapes have received scant protection and the level of consideration within the planning system varies widely. This includes all the associated infrastructure. We suggest that there is a presumption against new wind farms in wild land areas.

5. The document states:

“The landscape and visual impact of wind turbines, and how this can be understood both for an individual proposal and in concert with other existing and proposed developments, remains an evolving area.”

We disagree that this is an evolving area. There have been years of planning applications, Public Local Inquiries, and Determinations by Ministers, all using tools of assessment that have been around for a long time. We would hope that “evolving area” means that the Scottish Government will invest in **independent** assessment of the impact of on-shore wind development combined with clear guidelines for the consideration and protection of the landscape. Without leadership in this area we will lose those “cherished landscapes”. Such landscapes have intrinsic value and are important on many different levels.

We trust you will give serious consideration to our response.

Yours faithfully,

Jonathan Binny
Convenor
Scottish Wild Land Group