

Islay Community Council objection to MachairWind – Annex: Claimed Climate Benefit explainer

Explainer summary

The Iona Community Council objection to MachairWind identifies methodological deficiencies in the assessment of landscape and seascape, cultural heritage, socio-economics and biodiversity.

The Islay Community Council objection identifies the same type of deficiency in the assessment of the project's claimed climate benefits.

ScottishPower Renewables accepts that MachairWind would cause extensive environmental impacts, including many that its own Environmental Impact Assessment classifies as significant.

Its case for consent is therefore founded on the claimed climate benefit of the project. The claimed climate benefit is the principal reason advanced for why those impacts should nevertheless be accepted.

The Islay Community Council objection (Section 11) argues that the applicant has **not demonstrated the claimed climate benefit** on the evidential basis required.

The Islay objection deliberately does not speculate *why* the applicant did not provide the directly comparable analysis that would have demonstrated the claimed climate benefit if the evidence supported it; it identifies only the evidential consequence.

Taken together, the Iona and Islay Community Council objections reveal a consistent pattern. Across landscape and seascape, cultural heritage, socio-economics, biodiversity and now climate benefits, the question is the same: **does the applicant's own Environmental Impact Assessment provide sufficiently robust evidence for the conclusions it asks Ministers to reach?**

That brings us back to the central issue. Ministers are not being asked whether offshore wind is desirable in principle. They are not being asked whether climate change outweighs every other consideration. They are being asked whether the evidence demonstrates that this proposal, in this place, satisfies the statutory tests Parliament has established.

Detail

Why does the Islay objection say the claimed climate benefit has not been demonstrated?

This is quite a technical issue, but the underlying point is actually straightforward. The objection is **not** arguing that offshore wind cannot deliver substantial climate benefits. Nor is it arguing that MachairWind necessarily would not reduce greenhouse gas emissions.

It makes a narrower point: **The applicant asks Ministers to give significant planning weight to the project's claimed climate benefit, but its own assessment does not demonstrate the magnitude of that benefit on a sufficiently robust and directly comparable basis.**

Isn't comparing operational emissions enough?

This is the obvious question. If the question were simply:

"Once both generating technologies exist, which produces less carbon while generating electricity?"

then comparing the operational emissions of wind and gas would be entirely reasonable.

Indeed, that is exactly what the applicant says it has done. However, **that is not the planning question Ministers have to answer.**

What is the planning question?

Ministers are not deciding whether wind power is cleaner than gas.

They are deciding whether to **consent this project.**

The climate consequences of consenting the project include:

- manufacturing the turbines
- producing the steel and concrete
- transporting materials
- constructing the development
- operating and maintaining it for 35 years
- decommissioning it
- constructing the associated transmission infrastructure

Those emissions occur **because the project is built.** They are therefore part of the climate consequence of the planning decision.

The applicant itself calculates those lifecycle emissions. They total **7.56 million tonnes of CO₂e.**

So what should the lifecycle emissions be compared with?

The obvious comparison would be the **full lifecycle emissions of the alternative scenario.**

However, the applicant explains that its gas comparator is **not** a lifecycle figure.

It excludes the emissions from extracting, processing and transporting the gas, and therefore is **"not directly comparable"** with the lifecycle emissions of the wind farm.

The objection accepts that explanation. Its criticism is what happens next.

Having recognised that the figures are not directly comparable, the applicant **does not calculate the lifecycle emissions of the gas scenario** so that a proper comparison can be made.

What does it do instead?

Instead of comparing: **whole-project lifecycle emissions** against **whole-lifecycle emissions of the alternative**

the applicant bases its headline "avoided emissions" figure on **operational emissions only.**

In doing so, approximately **75% of the wind farm's own emissions**—construction, decommissioning and transmission infrastructure—are no longer part of the comparison used to calculate the headline climate benefit.

The objection does **not** say that this operational comparison is mathematically wrong.

It says that it answers a **different question.**

It tells Ministers how the two technologies compare **once they are already built.**

It does **not** establish the net lifetime climate consequence of **choosing to build this project**.

Why does this matter?

Because the applicant is asking Ministers to give **significant planning weight** to the climate benefit of **the project as a whole**.

The planning balance is not between:

- the operational emissions of a wind farm,
- and
- the operational emissions of a gas station.

The planning balance is between:

- the **whole environmental consequences** of consenting, constructing, operating and eventually decommissioning this project,
- and
- the **whole climate benefit** said to justify those consequences.

If Ministers are being asked to weigh the impacts of the **whole project**, they need evidence of the climate benefit of the **whole project**. An operational comparison answers a different question. It does not tell Ministers what the net lifetime climate consequence is of choosing to build this development rather than the alternative.

The objection therefore argues that the claimed climate benefit has **not been demonstrated on a directly comparable basis**, and that Ministers consequently do not have a sufficiently robust evidential basis for attaching the significant planning weight the applicant seeks.

There is one further point.

The applicant does make one comparison on a fully consistent basis.

It compares the carbon intensity of the project with that of its chosen counterfactual.

Using the applicant's own figures:

- MachairWind: **32.9 g CO₂e/kWh**
- Counterfactual: **20.7 g CO₂e/kWh**

On that comparison, the project appears approximately **59% more carbon-intensive per unit of electricity generated** than the comparator.

The objection is careful **not** to argue that this proves the project would increase global greenhouse gas emissions.

Instead, it makes a narrower and more important planning point.

The one comparison in the chapter that is internally consistent does **not** support the conclusion of significant climate benefit, while the comparison that does support that conclusion is one which the applicant itself acknowledges is **"not directly comparable"**.

The conclusion

The objection therefore does **not** say that MachairWind has no climate benefit. Nor does it challenge the importance of renewable energy.

It says something more limited but potentially very significant: **The applicant has not demonstrated, on a directly comparable basis, the net lifetime climate benefit of the project for which it seeks consent. Because that benefit has not been robustly evidenced, Ministers do not have a sound evidential basis for giving it the significant planning weight the applicant seeks under NPF4.**