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Renewable Energy Policy  
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6th September 2007

Dear Mr Clark

### **Reform of the Renewables Obligation, Consultation Document May 2007**

#### **Summary**

1. The views of the Ramblers' Association in relation to the Consultation on the Reform of the Renewables Obligation can be summarised as follows:

- i. We support the Government's intention to band the RO as a long-needed reform to target more support for a range of renewable technologies, and especially to provide more incentive through rewarding technologies which provide more firm generating capacity.
- ii. We would welcome more radical reform of the support for large-scale onshore wind generation, while retaining incentives for community-based, small-scale onshore wind turbine developments through the introduction of output limits to ROC eligibility rights.

#### **Preamble**

2. The Ramblers' Association is a voluntary organisation founded in 1935 whose aims include the protection of the outdoor environment so that walkers can enjoy its tranquillity and beauty. We have over 140,000 individual members as well as the members of affiliated clubs and societies. We cater for all abilities and seek to involve people of all ages, races and creeds in our work. The Association believes that it is the largest single organisation representing walkers in the UK and therefore campaigns to protect the countryside to ensure that it is maintained for all to enjoy.

3. In 2002, the General Council of the Ramblers' Association adopted the following policy:

*"This General Council calls upon government to invest immediately and substantially in industrial and domestic energy conservation, and environmentally sensitive sources of renewable energy. When wind power is developed alternatives should be found to the siting of wind turbines in national parks, areas of outstanding natural beauty and other scenic areas."*

4. This policy statement was further developed to reflect the more recent situation regarding the implementation of the UK Government renewable energy policies, and was adopted by the RA Board of Trustees in January 2007. Relevant to this consultation are the paragraphs:

*The current government subsidy mechanism, the Renewables Obligation, has been expensive and ineffective in bringing a range of technologies to market. Our key demand is for urgent*

*reform of this system so that diversity and decentralisation of electricity generation is encouraged.*

*We are concerned that the present Renewables Obligation system is resulting in an increasing number of large wind turbines in the landscape, which have an adverse impact on our appreciation of the quality of the countryside.*

5. This is consistent with our response to the previous RO review in 2005, the Energy Review of 2006 and the Reform of the Renewables Obligation consultation 2006. We believe that a range of alternative carbon reduction strategies is available to the Government which does not rely predominantly on giant onshore wind turbines.

6. As an environmental organisation, we support the promotion of the sustainable use of energy, and in particular, support energy technologies which are not environmentally damaging. However, given the landscape and visual impact of some renewable technologies, we would support a careful and responsible attitude to their development which takes other environmental issues into consideration, as well as carbon abatement.

### **Banding the Renewables Obligation**

7. As stated in our previous consultation responses to energy and renewables policy mechanisms we are strongly of the opinion that the Renewables Obligation Certificate system is in need of urgent overhaul. The Renewables Obligation needs a fundamental review as the RO has not been effective in assisting the development of renewable technologies other than onshore wind.

8. We welcome the recognition that the ROC system doesn't distinguish between different generating options with their differing merits, and that the RO cannot be allowed to remain technology neutral if the Government is serious about delivery of a portfolio of renewable technologies.

9. What needs equal recognition is that the RO is an inadequate way to meet Government targets for CO<sub>2</sub> emissions reduction. The Obligation has been effective in achieving the percentage electricity generating target in Scotland for 2010 and is well on the way to meeting the Scottish 2020 target, but the RO has been ineffective elsewhere, and the UK as a whole is rather lagging behind in achieving this target. It is worth noting here that geographical diversity is as important as technological diversity, and concentrating onshore wind generation mainly in Scotland could be counterproductive when high pressure systems can blanket the country for days, especially in mid-winter. This results in cold, still days with no wind, when demand for power will be high.

10. The important point to emphasise is that DTI figures suggest carbon emission reduction targets are still some way off from being achieved. It is now apparent that the encouragement of large-scale onshore wind turbine development has had little impact on CO<sub>2</sub> levels, and that the cost of the RO subsidy per unit of carbon is excessive compared to other methods of reducing emissions.

11. It is now a matter of urgency that the RO is reformed to create technological diversity and stop the over-subsidising of more economical technologies like large-scale onshore wind turbine developments. With the previous RO reviews in 2005 and 2006, the Government must surely have sufficient information available to be able to make the necessary changes now without further delay.

12. We support the Government's intention to band the RO as a long-needed reform to target more support for a range of renewable technologies. As to the approach used to

achieve this, we urge the Government to listen to grid control engineers as to how much intermittent generation can feasibly be connected in any particular region of the UK, and also the most effective way to deliver power from generator to market, bearing in mind the environmental sensitivities of remote and wild land, where many wind turbines are proposed to be sited..

13. We believe that firm, dispatchable electricity (generation with a high degree of predictability and therefore reliability) from renewable sources should be preferentially rewarded in any subsidy scheme. Firm generation can have the effect of *replacing* existing carbon-intensive generating plant, whereas intermittent renewables only *displace* conventional plant for a while.

14. Regarding the setting of the bands, we would expect to see support being greatly reduced so that the heat is taken out of the onshore wind market; a situation that is putting undue pressure on the planning system and is having significant landscape impacts to the open hills and uplands of the UK. The offshore market, however, still requires ROC support.

15. Having said that, we believe that there is a place for onshore wind in a suite of renewable generating technologies. We believe that land based wind turbine systems, as a supplementary power source, should be primarily designed for meeting local energy needs. New incentives are needed to provide an entirely different basis for encouraging wind turbine development, with preference given to small scale developments on land, with large scale developments in future being generally favoured in offshore locations.

16. In reducing support for more economic technologies like onshore wind, care needs to be taken to not disadvantage small scale community and domestic projects, and microgeneration projects in particular need much more support in linkages to grid networks and in administration of ROCs.

### **Conclusion**

17. In conclusion, we are supportive of this review of the impact of the Obligation in order move the market away from overemphasis on large-scale onshore windfarms, which has been identified as the most costly means available of reducing carbon emissions, as well as creating cumulative landscape impacts.

18. The RO needs to become more sophisticated in the way that it promotes renewable technologies, making links with other Government policies that manage energy demand, so that much more small-scale development is supported. Onshore renewables developments should promote local generation for local use, with associated investment in reinforcing the electricity distribution system, not major transmission overhead lines moving power from remote, scenic locations to the centres of demand.

Yours sincerely

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