



UK Renewable Energy Strategy

Response of the Ramblers' Association to the UK Government consultation on the UK Renewable Energy Strategy

September 2008

1. We welcome this consultation on the UK Renewable Energy Strategy. It provides an opportunity for discussing the problems of global warming and associated climate change, and how we as a society can deal with them. We had also hoped that it would help to resolve some serious problems in the relationship between UK energy policy and the safeguarding of the British landscape, but this aspect of policy implementation does not feature highly in this consultation.

Preamble

2. The Ramblers' Association is a voluntary organisation founded in 1935 whose primary objectives are to act as the representative voice for walkers, and the protection of the outdoor environment and maintenance of its long-term health and sustainability. We have approximately 137,000 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. 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.

The following are some general views on renewable energy generation in the UK, and more detailed comments on the questions asked within the consultation document, where they are relevant to the Ramblers' Association's interests:

4. The market for electricity generation from renewable sources has been distorted through an unbalanced support for lowest cost technologies, irrespective of energy returns and carbon abatement issues.

5. This has led to a proliferation of proposals for on-shore wind turbines, putting undue pressure on a strategic planning system that was not prepared for the quantity of proposals coming forward. It is the rightful role of development control to assess the quality of proposals, and a strategic plan must be prepared before any streamlining of the planning decision process to speed up proposal assessments.

6. This unfocused development of onshore wind turbines, of increasing height, has led to developments that conflict with landscape character and quality.

7. Proposals for banding the Renewable Obligation are a step in the right direction, but must be further refined to direct the indirect subsidy to reward development of technologies that are effective

in delivering dispatchable power, thereby reducing the over-reliance of onshore wind in the energy generation mix.

8. The effect of this would be two-fold: to protect the quality of the landscape, and to reduce the amount of intermittent power on the national grid. This must take place in conjunction with a substantial programme of energy conservation and energy efficiency targeted at existing housing stock and business premises.

9. We would welcome a broadening of the definition of the word 'scale' relating to wind energy. Currently we see scheme proposals that are described by developers as 'small scale' due to the fact that energy generation is low but ignoring the fact that the infrastructure that will be used to generate the small scale energy is in fact of a large, industrial scale.

10. The Ramblers' Association had the opportunity to receive a DBERR presentation on this consultation at a recent Campaign for National Parks seminar. During the presentation we were encouraged to hear that the consultation sets out scenarios for illustrative purposes so that the public are given an idea of what the strategy would look like on the ground. However, this consultation proposes only one delivery scenario which restricts responses to this context instead of a suite of possible on the ground delivery measures. Therefore, we would welcome a broader set of scenarios to address the UK's energy needs prior to this strategy's inception.

Q1: How might we design policies to meet the 2020 renewable energy target that give enough certainty to business but allow flexibility to change the level of ambition for a sector or the level of financial incentive as new information emerges?

Government reliance on market solutions to achieve this arbitrary 2020 target is a risky strategy, as investors will continue to rely on lowest cost/quickest return solutions like onshore wind to attempt to meet the installed capacity requirements. However, this strategy is a sticking-plaster solution as large-scale onshore wind turbines will not replace reliable base-load generation which our energy-intensive society requires, and will cause significant, wide-spread visual intrusion in the countryside, in order to satisfy increasing urban demands for power. Government planning of an appropriate energy mix would best serve business and society, while limiting the adverse effects of tall turbines across hill ranges. Energy conservation and efficiency measures could also be financially incentivised in preference to energy creation to enable a decrease in overall demand over time.

Q3: In the light of the EU renewable energy target, where should we focus further action on energy efficiency and what, if any, additional policies or measures would deliver the most cost-effective savings?

A hierarchy of energy conservation, energy efficiency and finally energy production should be instilled in the UK's approach to meeting EU renewable energy targets. To attempt to reduce the number of large onshore wind turbines that would be required to meet the EU target, increased incentives will need to be in place to not only ensure new-build houses and business premises are energy efficient, but also to ensure stimulation of an extensive programme to address the energy deficiencies of existing building stock. Voluntary measures may be found to be insufficient to tackle this.

Q4: Are our assessments of the potential of different renewable electricity technologies correct?

The numbers required for installed capacity may be a reasonable estimation, but there is insufficient analysis of the impact of such a quantity of intermittent power on grid stability. The numbers of wind turbines required may very well lead to over-investment in grid capacity, in order to accommodate the rare occasions when the installed capacity is all generating at once. New ways of handling intermittent power generators may need to be defined, along with means to constrain excess power flows on the grid without causing excessive costs to the electricity consumer, or resulting in extensive landscape impacts.

Q5: What more could the Government or other parties do to enable the planning system to facilitate renewable deployment?

The planning system must be able to properly assess the quality of renewables proposals, without having to make rushed decisions in order to meet arbitrary targets. One example could be to enable Local Planning Authorities to identify areas where wind turbines are unlikely to receive planning permission on biodiversity or landscape grounds, and also in other areas to be able to define criteria which developments must meet, including turbine heights and their relation to landscape character and features.

Q6: What more could the Government or other parties do to ensure community support for new renewable generation?

Renewable energy policy needs to include the provision of additional financial incentives and advice to those living in remote areas of Britain, especially in island communities, and to those parts of Britain's towns and cities which are suffering from social deprivation. The objective should be to encourage individual householders, businesses and local communities to become more self-sufficient in energy use through the development of small-scale renewable energy schemes, including wind turbine developments. Such support may be regarded as part of regional development policy in remote areas and as part of social policy in deprived areas. In both situations the aim would be to substantially reduce energy costs, both through energy conservation and local generation, and thereby providing significant environmental and economic benefits direct to individuals and local communities.

Community involvement in the planning system is an essential element of successful development for renewable energy. We would like to see ways that central government can enable early community involvement to help Local Planning Authorities to meet challenging renewable energy targets. Our policy position strongly advises that large-scale energy conservation measures coupled with small-scale energy production for local consumption will lock in energy production efficiencies into the strategy as well as reducing the likelihood of community opposition to large scale industrial development because of the scaled down nature of the infrastructure needed for local supply and a stronger sense of public ownership of planning decisions.

Q7: What more could the Government or other parties do to reduce the constraints on renewable wind power development arising from:

- marine navigation;**
- environmental legislation;**
- aviation and radar;**
- any other aspects of regulation?**

It would be useful to plan for marine development rather than let developments appear in the *ad hoc* fashion that has characterised the furore around onshore wind developments. It would also be very useful to see in this document a scenario that focuses on more small scale schemes and fewer large scale schemes, whilst also shifting to a 'local supply for local demand' approach. This scenario could lock in energy efficiencies by minimising energy loss during transfer and address aspects of environmental legislation focused on visual intrusion, landscape designation, tranquillity and amenity.

Q8: Taking into account decisions already taken on the offshore transmission regime and the measures set out in the Transmission Access Review, what more could the Government or other parties do to reduce the constraints on renewable development arising from grid issues?

A review of the GB Transmission System Capability procedures to allow more flexibility in dealing with intermittent power flows, and possibly thereby avoiding building further transmission lines which may be excess to actual requirements.

Q10: Do you agree with our analysis on the importance of retaining the Renewables Obligation as our prime support mechanism for centralised renewable electricity?

The RO may be effective in stimulating growth in onshore wind turbine development, but it is still the most expensive method available to Government in reducing greenhouse gas emissions, as observed by the National Audit Office and the Public Accounts Committee. Even with banding, ROCs still provide excessive payments to onshore wind generators.

It would be worth investigating a payment for onshore wind that is output limited. The purpose of the ROC system should be to generate funds to offset the capital investment required to develop a project. On a high windspeed site, developments will have a higher load factor, with a large output achieved relatively quickly in comparison to sites with lower windspeeds. There is the danger that these projects on sites with high windspeeds would still be receiving ROCs long after development costs have been met.

Whereas for the likes of small-scale community projects situated near to settlements on sites with lower windspeeds or projects with smaller turbines, it would take longer to generate a particular volume of power due to a lower load factor. They would therefore require an output related option to pay off their capital outlay over a longer time period. The effect of output limiting ROC eligibility would demonstrate that small-scale community and domestic projects are to be encouraged as a means of generating power locally for local use.

Q11: What changes (if any) should we make to the Renewables Obligation in the light of the EU 2020 renewable energy target?

As a general principle, 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.

Q12: What (if any) changes are needed to the current electricity market regime to ensure that the proposed increase in renewables generation does not undermine security of electricity supplies, and how can greater flexibility and responsiveness be encouraged in the demand side?

There is a case for reviewing the security standards by which the National Grid is run.

Q19: Do you agree with our analysis of the mechanisms for support of small-scale renewable electricity?

Support for small-scale generation is required, more so than for large-scale onshore wind.

Q20: Given the analysis on the benefits, costs and potential, in what way and to what extent should we direct support to microgeneration electricity?

Consideration of support or subsidy to quickly defray capital outlay is essential.

Q24: How can we best incentivise renewable and low-carbon transport in a sustainable and cost-effective way?

There is recognition of the need for sustainable patterns of transport, but there is also a need for fundamental changes in transport patterns, as well as substitution of fuels. However if a “business as usual” approach is pursued in regard to road infrastructure, it will have little effect on producing more sustainable, active travel, despite the addition of biofuels. We would like to see walking and cycling given equal weighting with other forms of transport, leading to increased priority within transport departments. We realise this responsibility lies with other Government departments, but joined-up thinking is required in order to effectively tackle climate change issues.

Q35: How can we adapt the Renewables Obligation to ensure that it effectively supports emerging as well as existing renewable technologies? Are there more effective ways of achieving this?

This RO is an inadequate way to meet Government targets for CO₂ emissions reduction. The Obligation has been effective in coming close to the percentage electricity generating target, but Defra figures suggest that carbon reduction targets are still some way off from being achieved. 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 Energy Review consultation earlier in 2006 and the previous RO reviews in 2005 and 2008, the Government must surely have sufficient information available to be able to make the necessary changes now without further delay.

Q40: What more could the Government or other parties do to ensure the UK meets the EU renewable energy target?

Re-examine the balance of renewable technologies required to deliver secure power outputs while avoiding greenhouse gas emissions. This would also need to be based on comparative cost and the ability to *replace* greenhouse gas emitting plant. The Government needs to plan the generating mix that the nation requires. Market-led solutions based on limited interventions that skew the market to lowest cost/highest rate of return creates a situation where large numbers of unpredictable and intermittent generators (onshore wind turbines) are required that cause significant landscape problems, while failing to provide value for money in carbon dioxide emissions abatement.

Q41: Do you agree with our overall approach to developing a UK Renewable Energy Strategy?

No. There is a need to place more emphasis on research and development of more predictable and reliable forms of renewable generation, coupled with a rollout of measures to reduce energy use in existing building stock. This is what our energy intensive society needs rather than a short-term reliance on large wind turbines which do little to replace non-renewable conventional electricity generators, while causing significant adverse impacts in remote and fragile upland areas.