

## **Ramblers Cymru policy on renewable energy development**

### **1. Introduction**

Ramblers Cymru accepts the seriousness of man-made climate change and the need to reduce carbon emissions through the production of renewable energy. This policy sets out Ramblers Cymru's views on renewable energy and the national and local policy framework that should guide decisions on where and at what scale schemes should be sited. While the policy applies to all renewable energy technologies, it places a specific focus on wind energy, as this is the technology that is having, and has the potential to have, the greatest impact on the Welsh landscape, visual amenity and the walking environment. The walking environment includes areas visible from rights of way, permissive footpaths, access land and the [National Trails](#) of Wales.

### **2. General**

A [charitable objective](#) of the Ramblers is the protection and enhancement, for the benefit of the public, of the beauty of the countryside. Ramblers Cymru therefore considers that renewable energy schemes must be sustainable in the fullest sense, both in terms of reducing carbon emissions and in avoiding and minimising harmful impacts on the Welsh landscape and walking environment. We believe that the guidance on renewable energy from the Welsh Government ([TAN 8](#)) is out-of-date and should be reviewed. We are especially concerned about the proliferation of large scale onshore wind schemes and the degradation to the Welsh landscape and walking environment that these are causing.

### **3. Incentives**

We support the development of renewable energy as part of new generating capacity. However, UK and Welsh Government policy is focused excessively on supporting renewables through large scale onshore wind energy developments. This is leading to the industrialisation of the Welsh landscape and is eroding public support for the development of renewable energy systems. New incentives are needed to shift the basis for encouraging wind turbine development, with preference to be given in future to smaller scale onshore developments, primarily designed for meeting local energy needs.

### **4. Mix of technologies**

While increasing the contribution to overall energy supply from renewable technologies is desirable, care must be taken to avoid undue concentration on any one technology. A diverse range of technologies is required.

### **5. The need for greater integration**

Applications for renewable energy generating schemes and for the infrastructure required to transmit the electricity that they produce are submitted by different applicants in different timescales, and are determined by different decision-makers. This fragmentation makes it difficult to consider schemes in the round and is a cause of confusion for the public. Ramblers Cymru believes the consenting regime should be reformed so that schemes are considered and determined in a more holistic manner. We suggest that the relevant legislation should be amended to enable this to happen.

### **6. Policy framework – Technical Advice Note 8 (TAN 8)**

As concluded by the National Assembly for Wales Environment and Sustainability Committee in June 2012, technological and other changes since TAN 8 was issued in 2005 have made it out-

of-date. Not least, today's wind turbines are often much higher and more conspicuous than when TAN 8 was drawn up. While favouring smaller-scale onshore wind energy, we support the principle of concentrating developments in order to prevent proliferation, provided that overall power generation targets are consistent with a robust analysis of the Welsh landscape. The cumulative scale of operational and proposed wind developments in most Strategic Search Areas now greatly exceeds even the TAN 8 indicative targets, as recognised by the [First Minister's Statement](#) in June 2011 that the targets should be regarded as upper limits. If all wind developments now proposed were to be built, along with the necessary grid connections, large areas of the Welsh landscape would be seriously damaged.

Ramblers Cymru believes therefore that the Welsh Government should review TAN 8 at the earliest opportunity so that a better balance is struck between the carbon reduction benefits of onshore wind schemes and their adverse environmental impacts. This will help to ensure that schemes are sustainable in the fullest sense (see paragraph 2) and that public support for renewables is not eroded. The review should include:

- An objective assessment of the Strategic Search Areas in relation to landscape impact, using the Countryside Council for Wales [LANDMAP](#) tool so that all high quality landscapes are taken into account, not just those nationally designated for their natural beauty. It is essential that a landscape assessment, hitherto lacking, should be carried out for any area being considered for wind energy development
- A methodology for assessing the impact of renewable energy schemes on the setting of designated landscapes, including views into and out of those landscapes
- Consideration of whether the emphasis on large scale onshore wind remains appropriate, given the adverse impact that this technology is having on many areas of Wales
- An assessment of the impact that wind energy schemes are having on areas of recreational importance such as access land, Forestry Commission land promoted for public recreation and National Trails (Offa's Dyke, Pembrokeshire Coast Path and Glyndwr's Way)
- The conversion of indicative targets to upper limits for development, subject to a landscape appraisal of the Strategic Search Areas, which may require the limits to be reduced

## **7. Dealing with proposed developments**

Ramblers Cymru, normally through the areas and groups, will consider proposals for renewable energy development on a case-by-case basis and will object to schemes that would have a detrimental impact on the Welsh landscape and walking environment such as to outweigh any carbon reduction or other benefits. Single turbine projects will be similarly appraised against the consideration of their effect on the public's enjoyment of the Welsh landscape and walking environment. Small scale projects will be supported, provided these do not affect the public's enjoyment of the Welsh landscape and walking environment. When considering proposals a range of factors will be taken into account, predominantly the impact on the landscape and the value attached to it by walkers. Environmental safeguards are especially important for new or emerging technologies, where the impacts may not be well understood.

## **8. Taking the policy forward**

UK and Welsh Government policy on renewable energy is evolving, and Ramblers Cymru policy will be reviewed by our Welsh Council as necessary.