



PIU Energy Policy Review

**Submission by
the Campaign for the Protection of Rural Wales
(CPRW)**

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Introduction - CPRW welcomes the PIU's Review and though the wider context is of great interest, it wishes to concentrate its submission on the Renewable Energy paper, with special but not exclusive reference to wind power issues (for reasons explained below).

1 CPRW's policy position

- 1.1 The Campaign for the Protection of Rural Wales (CPRW) is a registered membership charity founded in 1928 whose objects include the protection and conservation of the landscape. CPRW is as concerned as any organisation that atmospheric pollution and climate change could threaten the future of the planet and accepts the urgency and seriousness of the need to take action, which includes the desirability of increasing power generation from renewable sources, the reduction of atmospheric contaminants from fossil fuel burning, and an increased emphasis on energy conservation and restraint in its use. CPRW supports government policies to address these issues, but is nevertheless concerned at the emphasis on land-based wind energy which has developed, and at the adverse and progressive visual impacts of wind power station proposals which it regards as the greatest current threat to the landscape of Wales.
- 1.2 In 2000 CPRW's Executive Committee revised its policies on renewable energy installations, which after due debate were endorsed by its ruling national Council. In an Annex on wind power the policies accordingly contain a commitment "to oppose large scale or visually intrusive proposals in upland and coastal locations, in rural locations where residential and community amenity would be adversely affected, and in other areas that are valued locally, nationally or internationally for qualities which would be jeopardised".
- 1.3 It should also be noted that CPRW's policy is not to oppose on-shore wind turbine proposals which are small scale in their physical context and which would not have unacceptable impacts as defined above; and normally to support proposals for off-shore wind power that do not adversely affect coasts and estuaries of landscape, recreational or ecological importance. In this context CPRW would take an initially permissive view of other forms of renewable energy proposals.
- 1.4 In furtherance of this policy, CPRW has made major submissions to local planning authorities on almost every on-shore wind power station proposal in Wales, and has taken part in 7 Public Inquiries. It has also responded to many statutory consultations on the subject and is included as a partner in relevant working parties and study groups on related issues.

2 Comments on the Scoping Note

- 2.1 We note and support the wide range of the government's current activities [19] under 18 separate points, but in view of the sustained annual increases in electricity consumption we are disappointed to see that while there is reference to energy efficiency, and energy-saving products there is no mention of the desirability of encouraging restraint in use at a personal or domestic level.

3 Comments on the Renewable Energy paper

- 3.1 CPRW is re-assured to note the emphasis [1.2] that “the PIU has [not] in any respect closed its mind” and has read many of the earlier responses with great interest. We notice, however, that they are few in number and appear at this stage to cover an unrepresentative part of the wide spectrum of relevant interests. As we were not approached directly for a response we wonder whether there has been sufficiently wide publicity, or clarification that this study is operating independently of the various DTI consultations on the subject.
- 3.2 In the text on Technical Potential [4.1] we appreciate that this is a highly summarised account, but are surprised at the omission of sub-tidal current projects and the confinement of the reference to tidal *barrages* thus ignoring the various projects being developed to use the same principle in tidal lagoons. We are aware of several such projects at various stages of development, and feel that these could have the benefits of barrages without many of their disadvantages. We have the impression that the media and thus the general public equates renewable energy unduly closely with wind power, and we see the wind turbine being used both subliminally and overtly as an apparent surrogate for green issues, which from our perspective is erroneous and injurious.
- 3.3 In Table 1 the reference to the potential deployment of on-shore wind is qualified by a footnote which reads “Assuming minimal constraints due to planning, network and build rate”. This sets a tone and a theme which we observe throughout the last few years’ debate on this subject, and one which we are disappointed to see emerging throughout this document. The implication is that the planning system, and the constraints it has so obviously had for on-shore wind power station proposals, is a barrier to be overcome.
- 3.4 Accordingly we do not feel that the finding that the economic potential is greater than the practical potential is necessarily ‘perverse’ as stated. It simply reflects the fact that the established Town & Country Planning system does not permit a free for all wherever an opportunity may appear to exist. The same might apply, for example, to houses in the open countryside.
- 3.5 We notice that there is no Question or Proposition Box attached to this section of the text. Were that so, we would be responding that the assumptions for on-shore wind are not valid.
- 3.6 We note the reference to the local environmental impacts - especially visual intrusion in relation to onshore (and possibly offshore) wind [8.2]. Since this is the lead technology and by far the most conspicuous, which also being used (out of context) as an icon for renewable energy, we cannot agree with the bland proposition that “the environmental impacts of renewables are generally low”. Were this prefaced by the words “With the exception of wind power” the proposition would be tenable.
- 3.7 In relation to the text on *Perceptions* [8.3] we doubt from evidence we have seen whether wind power installations are as well-accepted as is suggested in Germany and Denmark. From survey work we have seen, we are also sceptical about the basis on which evidence is collected for opinion sampling. We do agree, however, that at least one reason where

there may be a higher level of public opposition in the UK is that the competitive nature of the NFFO system has driven developers to the more sensitive sites.

- 3.8 In this context it is important to stress that [10.4] the existing NFFO contracts which remain in place still represent a substantial proportion of the contracted capacity, which may be augmented further from the ‘portability’ of frustrated contracts. The link between high wind speed sites and adverse visual impact is clear and continuing, and until there is a specific mechanism to encourage developers to seek brownfield, acceptable lower yield, and offshore sites - possibly through selective NFFO portability - then the threat and conflict will continue.
- 3.9 Finally, we are concerned to see emphasis to the need to remove or overcome institutional barriers [11], of which the first and apparently major one is the difficulty of obtaining planning permission [11.2]. The clear implication here is that the planning system is refusing projects for capricious reasons. We do not accept this view, and regard this section as tantamount to the conclusion that some fast track or special pleading will have to be developed in the planning system for renewables - and by implication - for wind power in particular. We would suggest that this is moving the goalposts to suit the defects inherent in the players. Our conclusion would be to the contrary that there is something inherently wrong in the deployment of onshore wind power stations on the necessarily large scale envisaged. Individually and cumulatively they would have - and already are having in some areas - a devastating effect on the landscapes, enjoyment potential and tourism revenue of the countryside, coupled with an adverse effect on the amenity and thus the residential value of nearby properties.
- 3.10 We therefore conclude by emphasising that this particular institutional barrier is a justified expression of society’s high regard for the countryside, both in Wales and throughout the United Kingdom, and that the perceived ‘environmental imperative’ is not such that it justifies the radical change implied. The correct way forward to the aim we share with our critics is to develop appropriate technology in appropriate places, and despite our critical response to this aspect of the report we see much in the remainder of the PIU material to lead in that direction.

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