



# NO OPENCAST

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Allan Brereton,

Energy Review Team,  
PIU, Cabinet Office,  
Admiralty Arch,  
The Mall,  
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## COMMENTS PIU THE PIU SCOPING NOTE FOR ENERGY REVIEW

Dear Allan Brereton,

Greetings, and apologies for the belated despatch of these brief comments on particular aspects of the Scoping Note document. The Energy Review is a much-needed development, and we welcome the opportunity for this input.

No Opencast operates as a network of community groups and national organisations opposed to opencast(oc) mining. It has been supported by the National Union of Mineworkers, Friends of the Earth, Earth First, miners support groups and many other environmental and community organisations. Since 1995, we have organised a range of actions drawing publicity and attention to our campaigns for the closure of all opencast pits (with a general 'presumption against' oc mining to be included in the planning system), plus a comprehensive strategy for energy policies rooted in sustainable power generation & use (on a regional basis), and clean-burn technologies introduced extensively in all coal-fired power stations. While coal is still used, we feel it should be sourced from deep mine pits. Our comments reflect these concerns re cc mining and renewables etc.

Opencast mining is a highly destructive form of coal extraction bearing heavy social, health, economic and environmental costs for the countryside and mining communities. It has been described as "one of the most environmentally damaging processes being carried out in the UK," (House of Commons Select Energy Committee 1987).

Since the introduction of a revised Mineral Planning Guidance (MPG3) - which did contain a general presumption against the granting of planning permission for cc applications (unless community/environmental benefits... etc) - a more restrictive approach seems to have been taken by many local authorities in England & Wales. Subsequently we have been liaising with Scottish anti-opencast campaigning groups, as

- despite the introduction of NPPG16, allegedly equivalent to MPG3, (though not including a general presumption against...) - coal companies seem to be targeting the Scottish coal—belt with an increasing number of applications, many of which have been granted planning permission. Particular areas of the coal-belt have been devastated by this process, with perhaps the worst-hit being East Ayrshire.

We know that some of the Scottish groups were hoping to send in their comments re the situation in Scotland, and it is appropriate that their input should bear the weight of it's local relevance. Thus our essential points are itemised below, more as supportive corroboration for the input of fellow-campaigners in Scotland than as separate comment.

### 1. COAL

As a fossil fuel with a high carbon content, we would hope that, with regard to the recommendations of the Royal Commission on Environmental Pollution (RCEP) report on Energy and changing climate

i.e. 60-80% reductions in all greenhouse emissions, and notwithstanding questions re overall security of supply re energy sources, moves towards the limitations and phasing-out of the use of coal would find high priority in the Review of Energy policy.

Within this consideration, we would hope that, given the overall negative impact of opencast mining in many areas of the Scottish coal-belt, maximum limitation would be placed on any further cc development - with such restriction to take effect ASAP. In Scotland, cc mining tends to be seen as a planning issue, subject to local authority and Scottish Executive approval. Yet energy policy overall is a reserved matter, and emanates from Westminster/Whitehall. Thus there is a clear need for the Energy Review to outline a clear policy re opencast coal in Scotland (there is now only 1 remaining deep mine pit in Scotland), so that the correct emphasis (hopefully, restriction) will be enacted by local authorities.

Consideration will need be given to comprehensive regeneration/revitalisation measures in mining communities. The jobs argument rendered habitually in support of cc mining rarely stands up to any close examination, and alternative economic strategies will be needed, linking with remediation processes for deeply scarred environments. It is to be hoped that such strategies will be seen as components of wider sustainable economic practice, enacted on a regional! local basis.

## 2. SECURE, DIVERSE, SUSTAINABLE ENERGY SOURCES

On an ongoing basis - noting the Review as looking to 2050 - the only sources that do comprehensively fit these - criteria are those from renewable sources. Though it is good to note the ever-increasing range of initiatives/projects being undertaken in many of the UK' s regions and areas - wind turbines, photovoltaic and solar panel systems, hydropower, combined heat and power, and (minimally as yet) fuel cells - the sector overall remains massively under—resourced, given the scale of the task, it's relevance, and indeed the urgency of it' s comprehensive implementation.

There is huge potential for this sector, and we would see it as a major task and priority of the Energy Review to examine in intricate detail the minutiae of requisite investment and fiscal incentives which the Government might introduce in order to ensure that we do not, on a national basis, lose out on the potential for renewables — not in terms of energy considerations alone, but also employment, environmental gains, and wider ecological wellbeing.

Again, we would see the best strategy for such potential as being enacted through a devolved regional/local basis, with equal relevance and import for rural and urban areas, in Scotland, England, Wales and N. Ireland.

## 3. CY~HER SOURCES: OIL?/GAS?/NUCLEAR?/COAL?

Astonishingly, chillingly, tragically, as I finish these comments, news is coming in of events in New York and Washington that just numb the mind; it is now Tuesday 11 September 2001, and difficult to focus on the task in hand, so I'll finish this hurriedly. Terrorist attacks on the World Trade Centre and the Pentagon, thousands dead, the world changed, - different perceptions required of power, truth, and indeed, energy. Shortly, UK will be net importers of oil and gas. Our concerns re coal are detailed at point 1. Nuclear power, quite apart from the question of vulnerability to any terrorist attack, are concerted problems of the Magnox programme, the unreliability, the escalating costs, the questions re a radioactive waste legacy for the planet running into tens of thousands of years (!!!?), radioactive seepages into seas/oceans.

An urgent request, that the transition to clean, secure, diverse sources of energy generation be effected as speedily as possible - surely, if we value this precious Earth.

To close, we hope these points will be of some use in your considerations re the full Energy Review. They'll get to you slightly beyond the requested date, for which I'm sorry, but hope they 're not too late for inclusion in your report to the project committee. Thankyou.

With best wishes, sincerely

Ernest Rodker  
Chair, No Opencast