



CPRW Briefing: for the Minister of Sustainability, Environment and Housing.

Agenda item: October 8th 2007

TAN 8 Revisited

Generating renewable energy using industrial scale onshore wind installations has proven to be emotive and highly controversial.

Whilst supporting the development of renewable energy, CPRW has campaigned vigorously nationally and locally that all renewable technologies at both domestic and industrial scales should be encouraged in an environmentally responsible manner. We have strongly criticised the preferential advantage currently being given by TAN 8, for the promotion of industrial scale onshore wind development because of the extensive and unnecessary damage they are causing to the uplands of Wales. Our position in this respect remains unchanged.

Why TAN 8 is failing everybody

CPRW believes as do an increasing number of others that

- The strategic approach to promote renewable energy in TAN 8 is flawed and will not achieve the generation targets set out in Planning Policy Wales.
- The implementation of TAN 8 is resulting in the unnecessary and potentially long term loss of the quality, distinctiveness and amenity of the countryside and the unspoilt character of upland Wales.
- Rather than engaging communities of interests to achieve Wales' renewable energy ambitions, it is derisive and splitting rural communities

We have long advocated that as the principal rationale for any form of renewable energy, is its contribution to the mitigation of Climate change through the reduction of CO₂ emissions. The limitations and efficiency of wind technology means that industrial scale wind generation not only represents poor value for money but more importantly is having little more than a miniscule affect in reducing CO₂ emissions.

In addition recent studies show the critical value of Wales' uplands as life support systems and the significance and potency of their resources in mitigating the impacts of Climate Change. The functional role that the "*environmental resources and infrastructure*" of our uplands represent, is little recognised and their relevance has not been accounted for in the development of previous national renewable energy strategies. The effects of disturbing, and/or changing the hydrology and the status of soils in upland areas characterised by peat deposits, increases the exposure of these massive inert reservoirs of sequestered carbon to oxidation. When this occurs substantial amounts of previously inert carbon is released as CO₂ into the atmosphere. Instead of contributing to the reduction of CO₂ emissions, the use of our uplands for wind energy generation often results in a nett increase in atmospheric CO₂.

Such contradictions clearly highlight the lack scientific rigour associated with consequences of the existing approaches promoted by TAN 8. We therefore

believe that until these issues are resolved, the Assembly should introduce a moratorium on the development of any wind installations in upland Wales.

TAN 8 can and should work but will only do so if...

- It is accepted that it should be radically reviewed because it is failing to deliver either for the industry or the environment.
- The full contribution of measures which recognise the contribution of the demand management of energy, the promotion of consumer led energy efficiency and energy conservation initiatives are built into the a national sustainable energy balance sheet.
- The introduction of less environmentally controversial methods of renewable energy generation are encouraged
- The true contribution that domestic scale energy generation and saving can make to reducing CO₂ emissions.
- The inherently controversial presumption in favour of industrial scale wind power generating schemes in ring fenced Strategic Search Areas is abandoned.
- The current logic and implementation framework of TAN 8 is replaced by one which is comprehensive, integrated and refocuses on the Assembly's commitment in "*One Wales*" to combat climate change by ensuring a 3% reduction of CO₂ emissions each year in Wales.

What should TAN 8 include?

- Ensure that the 3% CO₂ emission reduction target, reflects the contribution of both energy conservation and generation measures.
- Share the responsibility to achieve the CO₂ target more equitably between the Assembly Government, Local Authorities and the public.
- Convert the 3% target into a "**Climate Change Challenge**" by placing the responsibility for its achievement on the Assembly Government and every Local Authority, including National Park Authorities.
- Define an agreed contribution and the most effective means by which each responsible authority should make to achieve the 3% annual reduction target.
- Allow the Assembly Government to reward those Authorities who meet or exceed their targets and develop innovative and sensitive ways of developing "**Sustainable energy budgets**" for their areas.
- Place the burden of responsibility for the production of energy on those who use it most and reward those who conserve it.

We believe such an approach is more democratically equitable than the centralised and prescriptive requirements of the existing TAN 8 guidance. By focussing responsibility the highly populated urban areas, large energy users and those not prepared to use energy sparingly; the burden of responsibility is more appropriately apportioned. In addition such an approach would mean that those in rural areas using less but currently bearing the consequences of those who are energy greedy would not see their local landscapes blighted and their communities unnecessary split. Such an approach is totally consistent with the polluter pays principles and the rationale of the Assembly's own Sustainable Development Scheme.

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