



**Supplementary Manifesto briefing
September 2010**

**Harnessing Wales' renewable energy potential in a responsible manner:
The necessity to revise TAN 8**

1. Context

1.1 CPRW supports the need to tackle the inevitable consequences and impacts of climate change by reducing CO₂ emissions. We acknowledge this can be achieved in part by sensitively utilising the natural resources of Wales to generate renewable energy.

1.2 CPRW does not however believe that the means of achieving this, as currently being pursued by the WAG through its Low Carbon Renewable Energy Strategy and in particular the emphasis in TAN 8 in promoting industrial scale onshore wind generation, are either appropriate or justified.

1.3 We fundamentally believe that the logic upon which TAN 8 is based was from its outset flawed and as demonstrated by the problems which have arisen during its implementation, has subsequently proven to be so.

1.4 CPRW advocates that the principle of developing **industrial scale** on shore wind power plants in remote upland areas to generate renewable energy was always and continues to be totally unjustified, short sighted and contrary to sustainable development principles. Evidence over the last five years vindicates CPRW's position; namely that the principles which justified the designation of the SSAs in original TAN 8 were flawed.

1.5 We contend therefore that there is now a compelling need for the current approaches in TAN 8 to be revisited so that it specifically accounts for:

- The principles enshrined in the European Landscape Convention that **"All landscapes matter"** and in particular the value and contribution that non designated landscapes offer and provide to the amenity of society as a whole and in particular the well being of those local people who live in those designated areas.
- The Westminster Government's commitment to develop nuclear power as the primary source of renewable energy in the UK and hence the marginal relevance of onshore wind as the platform for renewable energy generation in Wales.
- The immediate and long term impact that the construction of wind farms have on those uplands areas characterised by significant deposits of organic soil carbon, especially the counterproductive effects the release of CO₂ locked in the sequestered carbon on these sites will have on the carbon footprint of these schemes and hence the net CO₂ emissions balance they seek to reduce.
- The significant reduction in the CO₂ fixing and carbon regulating capacity of land in the WAG ownership as a result of the wholesale felling of trees on this land.



- The detrimental changes to the hydrological conditions of those upland areas converted into “turbinescapes”.
- The significant damage and permanent disruption to the road network of those rural areas within and adjacent to existing SSAs, caused by the transportation of turbine components, structures, materials and their ongoing maintenance.
- The lack of transmission capacity in the local grid network to service many existing SSA sites and the damage that is caused to their surrounding landscapes by the provision of new power transmission networks to serve their predicted power output requirements.
- The significant power loss which arises in the transmission of energy from these areas as a result of SSA being strategically located in areas remote from the hubs of national electricity distribution network.
- The dramatic changes in the nature of wind turbine technology, in particular the size and scale of current day wind turbines and the completely different and significantly increased visual and landscape impacts they now have on the areas within which they are located and on their surroundings.
- The conflict which the development of industrial scale wind farms has unveiled upon those rural communities affected by these proposals.
- The opportunities provided by the strategic redevelopment of underused / industrial sites in or close urban areas.
- The poor energy dividend which characterises the subsidy regime which underpins the financing of industrial scale wind generation in comparison to the increased public support and renewable energy supplement which would exist if this same money had been invested in energy conservation measures and the appealing range of smaller scale local /community based renewable energy technologies.
- The failure of the WAG to recognise the opportunities which SMART electricity generation and distribution technology would provide for the efficient use of locally generated small scale renewable energy sources.

1.6 Given these circumstances and therefore the failure of the SSA approach to deliver the reliable and sustained levels of energy output anticipated,

CPRW believes that

The founding principles of TAN 8’s spatial analysis for on shore wind energy development must be revisited before further irreparable damage is done to the life support qualities of the Welsh uplands and the communities that live and depend upon these areas.

CPRW therefore advocates that your Party

- **Repeals TAN 8** and replaces it with a more environmentally responsible and landscape sensitive approach to the development of on shore wind energy which encourages only those forms of wind generation schemes which meet and serve an agreed local need.
- **Introduces an immediate moratorium** on the development of industrial scale onshore wind power generation schemes in the uplands of Wales
- **Revises the current Environmental Impact Regulations** to require any proposal for on shore wind farm to include as part of its Environmental Statement, a comprehensive Carbon Impact Assessment of the development and its associated infrastructure on the land on which it is located and its surroundings.(including that affected by any proposed road improvements or transmission line enhancements)
- Requires all planning proposals for on shore wind to **include in the same application comprehensive details of the nature of all associated infrastructure works** including access routes and the proposed location of any additional power transmission networks to and from the site and their impact on the carbon balance of the site and its surroundings.
- **Reallocates the current funding and subsidy regimes** which give preferential opportunities for the development of commercially lead industrial scale wind power plants, to one which encourages community led initiatives which enable the income benefits from the scheme to be reinvested in facilities for those community affected by the scheme
- **Increases the payments associated with Feed in tariffs for non industrial scale renewable energy schemes**, to stimulate the growth of local solutions to local energy supply problems.
- **Requires all Electricity utility companies to utilise SMART transmission** technology to optimise the distribution and use of locally produced renewable energy.
- **Introduces an environmental levy on the developers of power stations** which require any new over ground high voltage transmission line networks to be constructed. These funds cross subsidise the undergrounding of any wirescapes which would otherwise need to be routed through important or sensitive landscapes or areas having recognised landscape qualities.