

# **Response to consultation on the Government's Renewables Energy Strategy**

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by Transition Brighton & Hove Energy Group

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## 1. Introduction.

To solve the problems of climate change and energy resource depletion, political decision makers must recognise the rise of Renewable Energy as being as significant an event as the Industrial Revolution. This is directly connected to issues of energy efficiency.

These problems and solutions require political commitment and mobilisation of resources comparable with the Second World War. This is more than a short term immense effort – we must cooperate at international levels to an unprecedented degree and also localise the production of materials, goods, foods and other services so that consumption of fuel in transportation is significantly reduced.

It requires leadership and foresight, under common endeavour. Our peoples, and the peoples of the World as a common humanity, need to rise up to the challenges. The consequences we face if we do not succeed are dire to state and amount to a global catastrophe unprecedented in human history.

## 2. What are the primary concerns?

Three crises beset mankind – a world financial crisis, an energy and resource crisis, and a climate crisis. It has been stated that “the level of effort required to bend the global emissions curve [of CO<sub>2</sub>] in time is Herculean” and there are reasoned apocalyptic views of climate change.

The Government consultation is written with the intention of framing policies that meet the 2020 renewable energy target of the EU. To promote the welfare of UK citizens and residents, it is necessary to ask if the EU targets are appropriate and sufficient to prevent the major problems of the threats of climate change and fossil fuel depletion. A careful analysis reveals that the EU targets are too conservative, and meeting them is no guarantee that major upheavals will be prevented.

Bigger emission cuts are needed if the EU is to meet its own target of limiting temperature increases to two degrees Celsius compared to pre-industrial levels. It has

been estimated that to avoid two degrees of warming we require a global emissions cut of 60% per capita between now and 2030. Nathan Rive and others estimate that to obtain a 50% chance of preventing more than two degrees of warming requires a global cut of 80% by 2050 in total emissions. From the point of view of climate change, anything less than a 30% reduction by 2020 is dangerously conservative.

Climate change is not the only energy issue surrounding fossil fuels. The other concern is depletion. Oil depletion – "peak oil" – has been studied extensively, and forecasts from analysis on average suggest a peak in production around 2010 and a decline around 2% after the peak. There has been less analysis done for gas, but it is generally agreed that peak gas should occur during the next five years after peak oil, and the decline is expected to be sharper.

Fossil fuel depletion needs to be taken into account because oil and gas are expected to decline sooner than coal. It is unrealistic to design a policy that assumes unlimited availability of a depleting resource, but UK government forecasts so far have assumed exactly that, including those that assume an increase in renewable energy. Given that almost all of our transport uses oil-based fuels and oil availability is bound to decrease in the very near future, any renewable energy policy that does not have as one of its main goals to encourage vastly improved efficiency in transport, and to reduce unnecessary transport as much as possible, will have to be abandoned as reality differs more and more from the planning.

### 3. How should the UK government respond?

#### 3.1. Change standpoint from risk assessment to contingency planning.

**Purpose.** The purpose of the Government's renewable energy strategy is to gradually reduce the burning of fossil fuels to combat climate change from global warming. Most western governments at last acknowledge its reality, but believe that it is not forecast to seriously affect our way of life for a decade, so the issue has a low priority.

Renewables used to be called 'alternatives' and treated as secondary to the primary fuels, which were fossil and nuclear. That standpoint is now *unreasonable*.

**Great storm?** Over the weekend of 13<sup>th</sup> Sept, hurricane Ike did \$1 trillion damage to the southern USA, flattening the insurance industry. Unsinkable companies went bust on what is now known as black Sunday (14.9.08). Government leaders posture a steady hand at the helm, but the timing of the arrival and the ferocity of events is not predictable, and may turn out to be beyond anyone's control.

The government document should acknowledge that a Great Storm threatens the whole of humanity with a global catastrophe, caused by the greed of us in the west who collectively consume more than 3 planet's worth of resources. The onus on us in the west is to adopt policies so that mankind can have a future.

**Precautionary principle.** The view of the document we are commenting on is wrong, and should be changed. The government's *standpoint* is based on the unspoken underlying assumption that continued foreign energy supplies of Russian gas and OPEC oil can be taken for granted as a fixed *given* for the term of the study, namely

at least until 2020 or even until 2050. The events of black Sunday show graphically that this assumption is not only *untenable*, but *absurd*.

That standpoint should be changed to the *precautionary* principle to assume the inconvenient truth that imports of foreign gas and oil could stop at any time. This requires a paradigm shift in thinking and attitude, which sees renewables as *primary*, and fossil fuels as secondary, and temporary.

**The Transition Town movement.** This was formed two years ago in 2006, to promote a paradigm shift. We ‘transitioners’ acknowledge that the west is dependent on gas from Russia and oil from the Middle East which the west does not control, and which could be turned off at any moment, whether war is declared or not.

There are many vested interests who are in denial of this truth. We are campaigning to influence others to our views, including government. Whether we influence policy or not, we are nevertheless doing what we can in our own back yards to mitigate against this eventuality.

The document should come from the same *position* as that which the transition town movement is coming – recognition that western society is cruising on an ocean liner which is not only *sinkable*, but could hit an iceberg and sink at any *moment*. The document should therefore be rewritten and start talking about the action required by government and citizens between now and ‘when’ that the sinking occurs.

**D day.** We should take the position that sooner or later the west’s foreign gas and oil supplies will cease at an anticipated future moment, which we will call ‘D day’.

The document should be rewritten as the government’s plan for the contingency of the cessation of foreign oil and gas. The plan should include the action required by national and local government and citizens in the run up to D day, whenever that might occur. It may be weeks, months, years or decades away. The more that the idea of a D day is in the mind of public opinion in the west, the better the contingency plan will work, and the further away D day will be pushed and recede.

**Commodity or right?** Petroleum products should be seen for what they really are, namely *commodities* to be traded, rather than *rights* to be taken by force by the strongest country that imposes its will on weaker countries who happen to have them.

As the representatives of us in the west, our political leaders are behaving like addicts who will stop at nothing to get the fix of oil to which we have become addicted. We are in process of drafting an ‘Energy Descent and Resilience Action Plan’ (EDRAP) which is like a 12 step programme to dry out the west of its addiction to oil, the essence of which is contained in this submission.

**Top priority.** The priority of the contingency plan should be pushed up to the very top of the political agenda. Declared or not, we in the west are in a state of emergency. As in 1938 the realisation that we needed to rearm against Hitler meant that when war broke out we had a years’ preparation behind us.

We should build renewables with the urgency and attitude prevailing from 1938 to 1945. Foreign gas and oil that the west receives between now and D day should be used to mitigate the effects of their inevitable subsequent cessation.

**Target 100% renewable electricity by 2020.** Al Gore pointed out in a speech last July the craziness of western policy, saying: ‘we are borrowing money from China, to buy oil in the Gulf, to burn and wreck the planet’. The solution is to stop, by adopting the policy of making 100% our electricity supply renewable by 2020.

Al Gore is right, and we urge all national and local governments throughout the world to adopt the 100% policy on renewables by 2020 as their central objective. He points out that the price/demand curve of fossil fuels is inexorably *upwards*, whereas that of renewables is inexorably *downwards*. That single policy could create a secure and better future of new jobs for everybody in the world, and eliminate the cause of wars over oil, securing the world peace that all citizens want.

### 3.2. Contingency plan for cessation of foreign gas and oil.

**What will happen?** What will the effect be after D day, when Russia turn off the gas tap and OPEC turns off the oil supply? These are two separate events, and so will probably occur at separate moments in time. The precautionary principle requires the worst case scenario be considered, that they occur at substantially the same time.

The only occasions in the past which give us any answer to this question are the OPEC price hikes in 1973, (about 300%) 1979 (about 100%) and July 2008 (about 50%), These gave us glimpses of what the consequences might be. There were long queues at filling stations, business was disrupted, and recession followed.

**Cuba 1990.** The example to study is Cuba. They had become dependent on the Soviet Union for oil and gas which ceased in 1990 after the Union collapsed. Cubans had to make a rapid adaptation, and now consume a seventh of the energy per capita of the USA. We would have to do the same. The longer the period we have before D day, the better we will be able to adapt, and less disruptive that adaptation will be.

A working hypothesis is that our petrol pumps will sometimes run dry, and some of our journeys by car, bus, train, and plane will be curtailed. Our lights will sometimes brown out or black out in our homes and offices, sometimes disrupting our computers and phones. Our shops will sometimes run out of goods. Water supply will be intermittent, and our taps will sometimes run dry. People will sometimes be hungry, if not starving.

To mitigate these effects we will have to localise the production of food, materials, goods, and services so that consumption of fuel for transportation is significantly reduced. Rationing may have to be introduced. This is a big subject which is well covered in the Transition Handbook – from oil dependency to local resilience.

**Civil Defence.** The contingency plan for that state of emergency should be modelled on the old Home Guard and Civil Defence plans. The aim should be to make the UK independent of foreign energy supplies as soon as possible, and by 2020 at the latest.

When choosing between alternative renewable resources the key issue is *energy return on energy invested*. For example

- Wind turbines take little energy to build, and can deliver energy returns of up to 100 times, (i.e. they deliver 100 times *more* energy than that required to build, erect and commission them).
- Coal fired power stations barely return 1, (i.e. they consume *as much* energy in building the station and mining and transporting the coal as they provide in electricity).
- Nuclear power stations return less than 1 (i.e. consume *more* energy in building them, mining the uranium, and disposing of the waste, and decommissioning).

We compare the “*Credit Crunch*” with the “*Energy Crunch*”, as the energy debt will catch up with us sooner or later.

### 3.3. Electricity generation security.

**Emergency generation.** A great dependency is on computers – for a secure supply of electricity to keep them running. Every town should plan to have local generators for at least the town hall, so the government machine can continue to work. Emergency generators should be installed as soon as possible, as in Woking. Ideally these should be renewables, but if fossil fuelled, it should be reserved for emergency use only.

## 4. Responses to questions

### UK RENEWABLE ENERGY STRATEGY JUNE 2008

**Q1: How might we design policies to meet the 2020 renewable energy target?**

*Tariffs and business models* should be developed which reward low consumption and distributed generation.

*Grant aid for energy efficiency* should be continued with vigour to extend the benefits of energy efficiency to low income households. There should be a stable financial environment for companies provided with grants to enable work on increasing domestic energy efficiency. Grants should not ‘dry up’ when their financial allocation is exceeded and should be set at a long term level.

**Q2: To what extent should we meet some of our renewable energy target through deployment in other countries?**

The suggested *renewable energy target* is 20% by 2020 across the EU. A cross European strategy is sensible as an opportunity to maximise renewables opportunities. The UK target of 15% of TOTAL energy coming from renewables by 2020 should be sourced within the UK based on an achievable plan.

*Renewables offset schemes, and negotiations with other EU states:* The UK government, to maintain the Renewables Offset schemes, should not prevent other EU nations from adopting policies that differ from those of the UK.

*Bogus schemes:* The need for transparency and confidence in environmental measures supply is urgent. A number of Carbon Offset schemes are bogus and unmonitored. The penalties for Carbon Offset fraud should be equivalent in all categories to that for financial fraud and theft

**Q3: (EU renewable energy target). Where should we act on energy efficiency and cost-effective savings?**

We ABSOLUTELY support the need for *energy efficiency and increased renewables deployment*. Possible links between access to ultra low use tariffs and highly energy efficient housing should be developed.

*Low use tariffs* which reward minimum consumption should be made.

The OFGEM *regulator* should impose a standard tariff structure and pricing breaks, so consumers can simply compare costs, encouraging genuine competition. Tariffs should be developed to have a single annual rise in April fixed for the next 12 months, consumers having the right to switch at any time.

*Load matching* is needed – grid demand follows a predictable pattern whereas renewables availability does not. Local energy (residential scale) storage needs to be provided using existing technologies as well as RandD to develop and support large scale (commercial) energy storage.

*Large scale energy efficiency projects:* Energy *saved* is energy that does not have to be provided, so it is sometimes called *negawatts*. There are many ways of doing this, from switching TV and computers off, rather than on standby, to insulating buildings, to large scale schemes.

*LED traffic lights:* We propose a UK statutory requirement forcing local authorities to adopt traffic lights with an energy efficiency equal or greater than current LEDs.

*Buckminster Fuller's ideas:* A EU solar generated energy scheme is based on Buckminster Fuller's transmission of electricity hyperefficiently over large distances.

*Local energy storage* is already available and viable in the form of deep cycle lead acid batteries. Local Authorities should implement demonstration projects across a range of housing stock.. We suggest the UK initiates a competition based on local conditions similar to the US Dept. of Energy [www.solardecathlon.org](http://www.solardecathlon.org) competition.

*Smart metering and demand management* should be promoted urgently. Widespread Internet availability provides for coordinated management of high load activity. Smart metering should be integrated with tariff management to ensure low consumption and off peak patterns of use are rewarded.

*Electricity metering library loans:* We have considered setting up a scheme for electricity metering library loans. The metering equipment to monitor electricity consumption of domestic appliances is a little expensive for the less well off. We propose that public libraries issue loans to their membership of this metering equipment.

We suggest *Energy Audits* are rolled out across residential properties as a matter of urgency with key recommendations to be acted on within 6 months. This would have a direct effect within 12 months. The Audit should be structured include fast EROIE measures as well as biggest saving measures. 80% of housing in place now will be in place in 2050.

A target of £1bn/year income from *exported renewable energy* is most unlikely.

**Q4: Are our assessments of the potential of different renewable electricity technologies correct?**

There is a need for *clarity and consistency of use and application of units*.

We are *not convinced the RO is a real success*.

*Wind schemes have gone ahead in poor wind regimes* and are not delivering as they should.

There is little note of the potential contribution of *wave power* – an example is Pelamis, a long flexible barrage rated at 750kW with a yield of 25-40%.

*Solar* is developing with major recent improvements in material efficiency. The US is installing utility scale PV projects.

Energy storage through *electrolysis* may be advancing.

**Q5: What more could the Government do to enable the planning system to facilitate renewable deployment?**

*On planning and planning delays* – we note that an efficient and rapid process, in particular for offshore wind farms, must be put in place, such is the urgency of dealing with the energy gap.

We believe the *planning system* needs proper tools for ensuring the best performing projects are prioritised. We also suggest the planning system should have much more direct influence over integrating energy efficiency and microgeneration and renewable energy sources. New build should be obliged to provide renewables appropriate to location and style of building.

**Q6: How can the Government ensure community support for renewable generation?**

It is essential the public have faith in the value of implemented schemes and hence the need for transparency and appropriateness.

Encouraging *not for profit energy supply* seems reasonable and community schemes could be viable. We suspect the potential is limited.

**Q7: What more could the Government or other parties do to reduce the constraints on renewable wind power development arising from aspects of regulation?**

a) There may be compatibility between offshore wind and Marine reserves once built and we suggest consultation with appropriate expert bodies is progressed urgently. The case is similar for wave power from flexible barrages.

b) Offshore protection in the Marine Bill needs to take account of renewables. We also suggest careful thought is given to risk and responses to failure of Carbon Capture and Storage technology.

c) Define standards required for radar installations to be unaffected and publish these to developers such that they are not faced with last minute objections.

There should be proper funding for the MoD to replace radar affected by wind turbines.

d) Ensure noise data is consistent and clear and published such that objections are based on reliable practice and evidence.

**Q8: Taking into account decisions taken on the offshore transmission regime and the measures in the Transmission Access Review, how can the Government or other parties reduce the constraints on renewable development arising from grid issues?**

Ensure greater use of *distributed generation, local energy storage and energy efficiency*. This will reduce demand for GRID supplied power.

**Q9: How can the Government or other parties reduce supply chain constraints on new renewables deployment?**

The projections for additional 25GW (rated) of Wind suggest 1 turbine per day will need to be installed for 10 years. This suggests a huge challenge but also an opportunity for UK industry. We suggest a proper *build plan* is developed with necessary business incentives to promote very rapid start up. There is a case for accelerated/extended writing down allowances.

**Q10: Do you agree with our analysis on the importance of retaining the Renewables Obligation as our prime support mechanism for centralised renewable electricity?**

We suggest RO qualifying *schemes should meet minimum EROEI criteria*. We prefer that actual limits and targets are broken down across generators and compliance is required in order to generate.

**Q11: What changes should we make to the Renewables Obligation in the light of the EU 2020 renewable energy target?**

We suggest EROEI *criteria* are introduced and RO is biased to those with the best performance.

**Q12: What changes are needed to the current electricity market regime to ensure that the proposed increase in renewables generation does not undermine security of electricity supplies, and how can greater flexibility and responsiveness be encouraged in the demand side?**

Use of *load sensitive tariffs* ought to be promoted, especially with industry.

*Onshore Wind:* The planning and other restrictions on onshore wind turbines should be relaxed to make it economic so anyone with land can erect one or more and sell power profitably to the grid, subject to a satisfactory EROEI case. Many of the continental countries already do this.

*Offshore wind/tidal:* The licencing of coastal waters should be extended all round the British Isles coastline for offshore wind/tidal power farms and speeded up, so that entrepreneurs can bid for them and build as soon as possible. Scotland already exceed the EU target of 30% renewables production because of its investment in offshore wind farms, an extension of their offshore oil rig production.

*Energy storage from wind farms:* Offshore wind turbines are presently the most cost effective, efficient and technologically well developed solution to both our energy and carbon emission problems. If solar PV realises the potential some see for it this could change.

The recent change of policy is commendable, but we have still a long way to go. The UK has some of the best characteristics for wind energy production in Europe, but on a per capita basis, our wind turbine power generation is less than one tenth of Denmark.

*Variable energy* from wind farm resources, which is predictable using both satellite data and computer modelling, can be *stored* by e.g.

A Severn barrage. The Severn barrage could provide three times the power storage of the 4 hour 1.6 Gw hydroelectric storage at Dinorwig in Wales. This would be a sensible way of storing the variable energy from wind power and releasing it as required.

Electrolysis. Recent developments mean this can now proceed using inexpensive materials, and this is now sufficiently efficient to be commercial.

Air compression. An enhancement is to store the heat that appears during compression, then return it to the air when the air is expanded. No utility scale plants of this type have been built. In practice round trip efficiency is expected to be 70%. Heat can be stored using liquid salts at 600 degrees Celsius. The US has experience in using a less advanced technology for storing wind turbine energy.

**Q13: What more could the Government do to realise the full potential of renewable Combined Heat and Power?**

*Combined Heat and Power (CHP) / District Heating:* This is a well established technology which was well developed in large European towns throughout the last century. The radiators in most of those cities were kept hot by hot water pipes laid under the roads, known as district heating.

They utilise the waste heat from the power stations, which were situated in the centre of the town to minimise losses. From 1930-1985 Battersea power station provided hot water to heat 3,500 flats in Pimlico via a cable tunnel under the Thames. The overall efficiency of energy utilisation of all these big schemes was in the region of 90%. These schemes became uneconomic in the era of cheap natural gas over the last few decades, but are now viable again at current gas prices. As gas prices rise further, CHP/DH schemes will become increasingly attractive investments.

Any power station which is situated close to a conurbation can be retrofitted with CHP. An example is Shoreham power station, which is a gas fired station of 400 MW. It throws away into the sea about 500 MW of hot water, but is near enough (within 10km) of a conurbation of 200,000 homes and businesses from Worthing to Brighton to be able to meet all the population's needs for space and water heating.

All that is required is district heating pipework under the roads to make the heat sink to condense the steam in the town instead of the sea – increasing the overall efficiency of the station from its present 55% to at least 90%, and saving the gas which those 200,000 homes presently consume (about 0.4 TWh pa) which is presently burnt twice.

The need for *back up fossil generation* needs to be properly explored. A modern CCGT can be generating within 30mins of start up. Properly coordinated cogeneration with renewables needs to be developed. Industrial scale CHP as demonstrated at Immingham shows sufficient potential for dramatically improving overall UK fuel efficiency. Consideration must be given to relocating generating plant to sites where this is viable. An initial study has shown potential for up to 16 GW continuous generation – equivalent to 10 nuclear power stations.

We note the role of the seasons in dictating energy consumption patterns.

In the end all costs come back to consumers either through direct billing or increased taxation. Energy efficiency is an immediate opportunity to achieve effective ROI solutions. It is critical to the success of a renewables/low carbon energy supply.

Taking Gross Thermal efficiency of UK GRID generating plant at 40% for coal and 50% for gas, this is greater than the projected 15% renewable contribution of 260 TWh by 2020. It is also approx. 0.6% of UK GDP.

**Q14: Are our assessments of the potential of renewable heat deployment correct?**

We suggest the approach taken by *Poyry in a report "Securing Power"* is carefully analysed and its potential explored. We suggest the potential for smaller CHP units at district/neighbourhood level is explored. Especially for new build we suggest energy self sufficiency at a local level is the target.

**Q17 How can the Government or other parties encourage renewable heat deployment?**

Build and implement *demonstration schemes* open to full scrutiny of results and costs.

**Q19: Do you agree with our analysis of the mechanisms for support of small-scale renewable electricity?**

There is a need for a *simple amortised cost package for householders* which guarantees energy provision up to a certain level, the cost over say 10 years to be equivalent to anticipated energy bills and finance should be available as part of a mortgage arrangement qualifying for MIRAS style relief. The package should include best practice energy efficiency. The cost case should be clear and straightforward.

**Q20: How and how much should we direct support to microgeneration electricity?**

*Excess electricity* should be bought at the same rate as the consumer pays.

*Financial incentives for photovoltaics*: Financial incentives for photovoltaics are needed, similar to long term German financial stimulation of this still rapidly developing technology, similarly enabled here so that UK industry is ready to take up the challenge when this form of energy becomes truly competitive.

Businesses and homes should be encouraged to install photovoltaic collectors on their roofs, which could keep computers and emergency lighting running in the event of a power brown out or black out. The planning restrictions hindering the erection of these should be removed. The electric companies should allow and pay for electricity surplus to be exported to the grid, so that the output of all home generators is pooled.

**Q21: If better information will aid the development of distributed energy, where should attention be focused?**

Focus on clear transparent demonstration projects with results appropriate to local conditions.

**Q22: Do you agree with the Government's current position that it should not introduce statutory targets for microgeneration at this stage in its development?**

Results of the above demonstrations should be used to *quantify the potential*. Demonstrations should be run for a year then a rollout plan with statutory targets should be developed. This should be subject to annual review as technology improves and energy costs change. The projects should be run in public view with results published in a public forum similar to the Warwick Wind Trials.

The *exception* is new build where *solar thermal should be statutory* – the installed base shows this to be effective with good EROEI.

**Q23 How can the Government incentivise retrofit of distributed energy technologies?**

Widespread *skills transfer program for installers*.

**Q24: How can we best incentivise renewable and low-carbon transport in a sustainable and cost-effective way?**

We suggest much greater emphasis is given to the *prioritisation of walking and cycling* for transport in urban areas and suggest minimum targets for energy consumed per passenger km travelled are required from public transport operators – these must be based on actual full seats!

Part of the answer is to *dis-incentivise high-carbon transport*.

*Planning permissions for airports*: Planning constraints on airport construction are an effective way of obstructing the development of air travel, which some point out produces in each flight more carbon dioxide emissions than would be produced under a lifetime's use of energy inefficient light bulbs.

The inequitable pricing of aircraft fuel under international agreements, so that more carbon efficient transportation is penalised, needs to be redressed. Aircraft fuel should be taxed similarly to road fuel at the very least, eliminating a subsidy of aviation.

Expansion of existing airports should be considered carefully and rarely accepted. Cheap flight carriers are likely to go bankrupt as oil prices increase due to limited supply, and the future of aviation is likely to become a type of transport available only to the upper part of the market due to constraints in fuel supply.

If the prices were further increased by the suggested taxes, it would guarantee a drastic reduction in flights. Airport facilities are likely to be sufficient for the foreseeable future, as an industry that is likely to suffer imminent contraction.

*Future cars*: Whatever the future of the car – circumstances will force it to be reduced – the desirability of a transfer of new car production to hybrid electric and electric vehicles presents itself.

We are cautious re: electric vehicles – they may consume all the RE generated! We suggest urgent measures for improving occupancy of vehicles to provide improved efficiency of the IC engine. We suggest urgent measures to achieve an urban shift to walking and cycling. There are benefits of health and environmental improvements.

Electric and hybrid cars are already on the market, produced in small quantities so the price is high. Fiscal measures should be used to penalise gas guzzlers and promote hybrid and, some think, electric cars which can be more than twice as efficient. An approach is to reduce car tax for these type of vehicles – not a blanket reduction, but depending on the level of efficiency achieved by the model. The easiest approach would be to tax cars depending on average mileage per kilo of carbon dioxide emitted, taking into account the carbon emissions of vehicles powered through the electricity grid would vary depending on the amount of fossil fuels in the electricity mix, so the tax would need to be recalculated every year.

The government should set challenging standards of new vehicle energy efficiency, standards to reduce the energy expended in the construction of new vehicles, and measures to ensure the lifetimes of such vehicles are extended.

The capacity of public transport needs to be increased, because higher prices of oil and carbon taxes will gradually erode car ownership levels. Public transport infrastructure needs generous investment. Ideally, public transport networks should be centrally coordinated and not profit-driven, and service level agreements set up with customers, so that regular users who buy seasonal tickets would get refunds if the level of service dropped beyond a known value.

We suggest *wind power for shipping* should be evaluated and encouraged.

*Rail* could benefit from the solar potential of the land portfolio but it especially requires metered energy use, improved off peak utilisation and regenerative braking. Improved off peak use should be achieved by widening appeal to all social groups.

Consideration should be given to *free off peak travel* in order to benefit overall UK energy efficiency. There is a huge spare capacity in the off peak use of public transport. Each of those empty seats could be a single occupancy car of the road.

**Q25: What potential is there for the introduction of vehicles powered through the electricity grid in the UK? What impact would the widespread introduction of these kinds of vehicles have?**

Substituting the current fleet of vehicles for electric ones powered through the electricity grid would require a *50% increase in generating capacity*. This is clearly unrealistic, especially when at the same time fossil fuel power plants need to be substituted by renewable electricity in large numbers.

New vehicles powered through the grid should be introduced only under the following circumstances:

- a. If the amount of renewable electricity has increased to such levels that electric vehicles have less carbon emissions than those using oil-based fuels, and there is spare capacity in the grid
- b. For transport that is absolutely necessary (such as ambulances, fire, etc.), in case that there are shortages of oil-based fuels
- c. For trains, because many are already electric and the average locomotive lasts more than 20 years, and by that time diesel may not be easily available.

**Q26: Over what timescales do you think electric vehicles could plausibly contribute to our renewable energy and carbon reduction targets and what could the Government do to accelerate the introduction of such vehicles in the UK?**

Some of us believe the Government should NOT try to accelerate the introduction of electric vehicles.

We suggest caution with electric vehicles, similar to present IC vehicles. Electric vehicles will require approximately *50%* more energy available via the GRID.

Reduce IC vehicle demand by incentivising the alternatives. We suggest studies are done to investigate/support the local employment and economic benefits.

**Q29: Should the Government take further regulatory measures to discourage biomass waste, including food waste, from going to landfill? If so, which types? What, if any, other measures should be taken to encourage its use to generate bioenergy?**

*Energy from waste:* There are better ways of obtaining energy from waste than mass incineration, which produces dioxins downwind of the exhaust plume causing health hazards to the population.

We strongly support LESS WASTE. The EROEI case will be far better for reducing waste than accepting it but reusing it for fuel.

We suggest CHP *is the default* for all energy from waste plants.

**Q35: How can we adapt the Renewables Obligation to ensure that it effectively supports emerging as well as existing renewable technologies?**

We suggest ROC *is increased* according to EROEI criteria and competitions are promoted to encourage innovation.

**Q37: Are there barriers to renewable technologies that are not addressed?**

The document has little mention of *energy storage at either local or bulk scale*. This needs to be a specific area of RandD. Existing viable technologies (deep cycle lead acid for example) need to be packaged and promoted for domestic use. We suggest storage and transport applications are separated.

Development of a *demonstration distributed neighbourhood generation scheme* should be encouraged.

**Q38: How can the Government or other parties ensure that the UK secures the maximum business and employment benefits from the EU renewable energy target?**

We would like to see stimulation of the *practical teaching for trades* in the construction of solar panels on domestic and industrial properties, and also for photovoltaic arrays, for example, locally in B&H College of Technology.

It is best to develop skills transfer programs whilst running demonstration/evaluation projects – incentivise UK based manufacture then mobilise to implement.

**Q40: How can the Government ensure the UK meets the EU renewable energy target?**

Urgently *tackle waste and inefficiency* across all sectors.

Scale of deployment is a big issue – work should be done on *modelling possible speed of deployment* of smaller scale distributed generation. Say 10 MW rated offshore turbines become possible – approx 1 per day manufacture, ship, install and commission – a huge employment and business opportunity. However compare the London Array – aiming for 341 turbines over 4 years. The microgeneration case needs to be worked up for comparison/compatibility.

**Q41: Is our overall approach to a UK Renewable Energy Strategy right?**

*No – it is too little too late.* Whilst this consultation is still open it appears the decisions for new nuclear and new coal have been taken. Government needs to properly coordinate across departments and policy objectives.

Recent events in the finance markets show deregulated industries to lack a strategic view and they fail due to the domination of short term objectives. Energy and environmental policy need long term direction and commitment.

Much of this consultation appears to be interested in protecting the “market”. The energy market does not need protecting – it is the consumer and the environment which need protection!

In the end all costs find their way back to the consumer. The cheapest solution is to use less and reward people for doing so. Compared to the commodity price rises recently seen in the energy sector these are small amounts. Renewables have the benefit of being commodity independent and are effectively a capital purchase case and therefore offer security of price related to the cost of capital. Future revenue streams beyond the capital return period will be highly profitable and should lead to energy price reductions. An example of socially responsible capital repayment scheme on this model is French toll motorways.

The outcome of this Consultation is due for publication spring 2009 – this is only 6 months away. The need for radical reform is not likely to be properly analysed in this timescale and this is supported by today’s announcement of “business as usual” commitment to centralised generation. We suggest strict EROIE evaluations of coal with CCS and nuclear are performed.

A bit more time in the analysis and planning stage will be time well spent. The example of Bio fuels as rushed legislation giving unexpected and unwanted results should not be forgotten.

**QX: What should the Government do about nuclear power?**

We are convinced *nuclear power’s* justification is a dual one of energy generation and production of fissilable weapons material, otherwise Thorium reactors would have equal or more justification – since their nuclear waste is much easier to handle. They do not solve the immediate energy gap problem. Since it is government policy to take this route, they will no doubt ensure that such construction is enabled.

New nuclear power stations take at least 10 years to build, so will always lag a decade behind the gap. They also have a very low energy return, even lower than coal, less than 1, so that they take more energy to build, mine and transport the uranium, dispose of the waste and decommission, than they create in electrical output. They can therefore not be classed as a renewable resource.

Despite a half century of trying, the problems of disposing of the radioactive waste and decommissioning have not yet been solved, and the stations are therefore uninsurable.

We therefore believe that nuclear power should be dropped from the contingency plan. Pursuing the nuclear option further will be a distraction that takes scarce resources away from truly renewable solutions.

**QA5: Should we put in safeguards to limit the cost of feed-in tariffs for small-scale electricity generation? How could safeguards be set, and what would the criteria be?**

We suggest EROEI *criteria* are used with all schemes being allowed provided they meet a minimum standard.

## 5. Conclusion and recommendation

We recommend national and local government adopt Al Gore's policy initiative of making 100% of our electricity renewable, and all vehicles highly energy efficient as soon as possible, and by 2020 at the latest. This could be termed the Renewables Revolution, as it will be to the world what the Industrial Revolution was to the west, giving birth to many new industries and jobs.

To realise this vision we need to maximise our resources and cooperate at international levels to a hitherto unprecedented degree. It requires leadership based on common worldwide endeavour, wisdom and foresight.

## 6. References

<http://www.jimhadams.com/eco/BHTransitionEnergyRenewablesConsultation7.pdf>

Many other references can be found in the <http://www.jimhadams.com> website.

## 7. Writing of this document

Transition Brighton & Hove (<http://www.transitionbrightonandhove.org.uk>) is open to all citizens of Brighton & Hove and the surrounding area. B&H Transition Energy Group is a subgroup of this organisation.