

CCERA scrutiny of the working draft of Future Wales

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Submission from CPRW (The Campaign for the Protection of Rural Wales)



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CPRW was founded in 1928, this year celebrates its 92nd anniversary, and is Wales' only organisation whose primary concern is the country's rural landscape together with the land uses and economy that support it. It is a membership charity (number: 239899) with its head office at 31 High Street Welshpool Powys and 14 Branches. Further details of its submissions to the Welsh Government consultation on the NDF are to be found on its website (<https://cprw.org.uk>) including its National Executive Committee (NEC) and representative advisory Council.

I am Geoffrey Ashton Sinclair, a largely retired environmental consultant. I have been an active and influential member of CPRW for 50 years. I am a Trustee and Acting vice-Chair. I have written many of CPRW's consultation responses and was its consultant on renewable energy cases from 1995 to 2005.

1 CPRW's response to the NDF

[The need for this detail is explained at 5.3 below]

- 1.1 After a dialogue with members and Branches, the National Executive Committee of CPRW replied constructively and in critical detail to the wide range of topics related to rural Wales in the 2nd draft of the NDF, most of which were broad-brush, as befitted such a comprehensive document. Our submissions took up more than twice the KBs of any other in the 'Other' category of 87 responses.
- 1.2 On 11th November 2019 we wrote an interim urgent response to three government Ministers (now a free-standing part of our evidence) which concluded that it was '*devoid of an articulate central policy suite capable of rationally addressing the climate emergency*' ... a debate in which CPRW was '*eager to play a constructive role.* ...
- 1.3 Our main document extended to 88 pp and contained five detailed sections:
 1. Part 1 The Response Form [29 pp]
 2. Part 2 The NDF's Onshore Wind and Solar text [25 pp] – subsections below:
 - 2.1 The renewables target:
 - 2.2 The Onshore Renewable Energy Technologies used in the NDF
 - 2.3 70% in 2030 - what does it mean and what does it involve?
 - 2.4 The 15 'Priority Areas' (PAs)
 - 2.5 The Rational Solution
 - 2.6 Conclusion – what should the Welsh Government now do?
 3. Appendix 1. Application of Constraints: Arup vs Aecom methodology [7 pp]
 4. Appendix 2. Full response to HRA assessment [7 pp]
 - 5..Appendix 3. Errors, problems & methodology in the evidence [20 pp]
- 1.4 Despite detailed text under all these headings our chief concern was the specific and prescriptive focus of the Renewable Energy (RE) text which in our view was inappropriate in a spatial plan straitjacketed by its confinement to land areas. In Part 2 we argued that as marine technology was generally accepted to become the dominant renewable in the next decade it was a fundamental mistake to make contentious and specific proposals for terrestrial technology in isolation. Moreover, that process was influenced by ultra-ambitious targets for each of the Priority Areas as calculated by Arup Consultants (NDF Appendix E).
- 1.5 We bemoaned the lack of factual detail to justify this approach and calculated that the various targets could be achieved by various combinations of floating wind turbines up to 50km from shore – following the schemes currently being financially stimulated by the Welsh Government. This did not mean that we were categorically against wind turbines (or solar panels) in the Welsh countryside
- 1.6 The climate emergency was a universal problem and required comprehensive thought-out solutions. An ambitious land-based approach to RE was premature and demonstrably imposed irrational targets on rural Wales that would unjustifiably threaten the landscapes and special qualities of the countryside. Our conclusion was more radical than just a complaint about the exclusion of offshore technology (which the Minister repeatedly stresses is not on the Future Wales agenda), but required that the process should be combined with a similar approach within the Wales National Marine Plan, and that neither could possibly make any rational sense if devised in isolation from the other.

2 CCERA recommendations on related topics

- 2.1 Two of CCERA's previous reports took a position which is not inconsistent with CPRW's. In its 2018 feedback on the **draft National Marine Plan** it recommended that :

6: The Welsh Government should set out how the National Development Framework, Planning Policy Wales and the draft Plan will work together. This should include the decision-making process for agreeing developments on land which will have an impact on the marine environment and the consultation process between the relevant planning authorities and Natural Resources Wales.

- 2.2 The Minister accepted this in principle noting that:

Together, the WNMP, Planning Policy Wales (PPW) and the National Development Framework (NDF) will set the strategic direction and framework for decision making in the terrestrial and marine environments. They will support integrated decision making and collaboration across land and sea interfaces.

Perhaps she and her colleagues should be reminded of those useful phrases.

- 2.3 More recently, in its **Report on the draft NDF** of December 2019 CCERA stated

Conclusion 34. *The NDF should set out a unifying strategic vision for the future of energy in Wales and be clear about the targets for electricity generation and decarbonisation to which the Welsh Government is working.*

- 2.4 The Ministerial response states that that 'It is not the role of the NDF to set the Welsh Government's overarching energy strategy and policy'. In legalistic terms that may be true, but it reveals two separated positions which - unless some joint approach is devised - prevent a prior evaluation of the need, the process and the relationship of all components. Hopefully CCERA has not been put off by this dead-bat answer.

3 CPRW's response to Members of the Senedd

- 3.1 On 15th September 2020 (in advance of the issue of Future Wales on 21st and prior to the Plenary session on 18th) CPRW sent an **Open Letter** to all Members of the Senedd summarising its position as set out above, and citing examples of Welsh Government text supportive of marine renewables – including a Press Release of September 2019 stating that '*Wales can be a nation powered by marine energy*'. At Plenary, wind turbines were by far the most frequently-mentioned topic across the political spectrum, often echoing the sentiments of the Open Letter, but not grasping the nettle of CPRW's radical critique that the Framework's RE section was unfit for purpose and should be withdrawn and re-written.

4 CPRW's response to Future Wales

- 4.1 Only days afterwards, Future Wales was published. Following a detailed analysis of the three-column 'Changes' document, I calculated that over 70% of the text differed materially from that in the NDF. CPRW accepts that the structure and some of the content is a significant improvement.– for example the references to the South East Wales Transport Commission on alternatives to the abandoned M4 extension project, and the re-casting of Wales into four rather than three Regions. However, and despite it being a persistent topic in Plenary, the RE section has been shrunk to 3% of the text, of which almost 80% is new, suggesting a pervasive disconnect between Members and the current text. The removal of solar from the pre-Assessed Areas might seem to reduce pressure on certain locations, but could encourage proposals across the country outside designated areas. While the reduction of pressure on Ynys Mon is welcome in itself, it is a side issue when compared to CPRW's main critique of the NDF. That therefore remains the focus of this submission.

5 The Welsh Government 's response to submissions on the NDF

- 5.1 The text of the **Consultation Report** (compiled by Strategic Research and Insight Ltd) is a key part of the raw material on which the WG has based FW. However, it is grossly inconsistent, and to that extent unprofessional. It is of no real service to the Committee, whose members should be able to rely upon it for systematic fairness, completeness, and reliability. There is no consistency as to attribution. It cites and quotes, often at length, masses of individual responses, revealed by the use of the first person pronoun – '*I think; I believe*', etc., etc.. Many are idiosyncratic. Some obscure and even niche organisations are given generous and acknowledged quotations. In the analysis tables of totals, the report scores each of these individual responses as 1 each, while apparently doing the same for established and authoritative sources.
- 5.2 I systematically studied the synopses of everyone's comments on RE and the terrestrial / marine conundrum. I soon found – rather like the preponderance of the MS comments on the Senedd debate - that the topic which dominated most sections was RE, wind turbines and the lack of a marine dimension.
- 5.3 As well as a bizarre selection of conflicting and sometimes idiosyncratic individuals, there were some attributed comments from CPRW's specialised partner organisations such as the Alliance for Welsh Designated Landscapes, and the Cambrian Mountains Society. But, **there was not a trace of anything on any topic attributed to CPRW.** This was despite our submission being detailed, thorough, forcibly expressed and unique in its critical approach seeking a withdrawal of the RE. It is for this reason that I have had to explain CPRW's position in detail to the Committee and to set it in context of other responses on this topic, both within the Future Wales exercise, in the Plenary and CCERA.

6 The CCERA session October 2020

- 6.1 As in other venues, the topic of RE kept re-occurring. The Minister repeated clearly that the NDF is '*a spatial plan for the land*' and therefore did not accept that responding to the climate emergency through RE should or could be a joint exercise with the Marine Plan.
- 6.2 However, two specific points emerged during the debate, on which I need to comment: *[See Update below]*.
- 6.3 **Neil Hamilton MS** spoke at length about renewables and their impact on the landscape, the emphasis on onshore wind, problems in the Powys LDP, etc. His first words were as follows: [23min 05 sec] '*I didn't declare an interest ... but I am a strong vocal member of the Campaign for the Protection of Rural Wales ...*' Mr Hamilton is self-evidently strong and vocal in his opinions here and elsewhere on renewable energy and onshore windfarms, but while he is registered as a member of our Brecon & Radnor Branch, he has never to my or colleagues' knowledge made any direct contact with CPRW at *either branch or* national level. He is entitled to his views which in some details may co-incide with CPRW's but do not represent the settled position of the Charity or its evidence to the NDF.
- 6.4 Somewhat later [1 hour 08 minutes 37 seconds] and at the Minister's request, **Jon Fudge** of the Welsh Government's Planning Division described the NDF consultation process in response to Janet Finch Saunders MS. He included the following claim... '*Ministers met with CPRW*'...The impression given is of a formal meeting. None such took place. It is possible but unlikely that one, let alone multiple, Ministers may have been present at a Drop In session, but that is hardly '*met with*', and none of my colleagues can recall any such event.

7 Conclusion

- 7.1 There must be an integrated policy on RE as a whole, calibrated properly and progressively for the decade to the 2030 target and for the rest of the period to 2040. To claim that the onshore and offshore RE are separate pieces of the Welsh Government demonstrates the fatal flaw in this approach to the climate emergency. It reveals a willingness to impose unjustified burdens on the already stressed countryside - plus the controversial and largely uncharted locations for grid transmission lines. It has attracted massive speculative DNS wind proposals in sensitive areas of the wider countryside, such as Pumlumon and the Radnor Forest.
- 7.2 The unpalatable conclusion is twofold:
- a) The scope of the working draft of FW has been so distorted by the rogue agenda on RE due to the exclusion of its key marine component and the false focus on onshore wind while at the same time only 3% of the text covers this most controversial topic;

- b) In a simple policy re-evaluation to demonstrate a holistic approach to the energy aspects of the climate emergency, the RE assessment should be re-cast to fuse the NDF and NMP approach within one separate document.

CPRW respectfully asks the Committee to recommend such a change leading to a rational and effective approach to the climate emergency which would then save the landscapes of rural Wales from a needless sacrifice.

Update in relation to section 6.3 and 6.4

CPRW's Montgomeryshire Branch has since pointed out that Mr Hamilton has communicated **at a Branch level**, and again that **individual Branch members** had once unilaterally discussed the NDF with the Minister at a meeting arranged by the County's MS Russell George.