

Open Letter from the National Executive of CPRW

(The Campaign for the Protection of Rural Wales)



Contact details: carys@cprwmail.org.uk
31 High Street, Welshpool SY21 7YD - 01938 552525

15th September 2020

Dear Member of the Senedd

The National Development Framework (NDF): Renewable Energy proposals

From next Monday (21 Sept) all Members will be receiving the third revision of the National Development Framework for a 'formal scrutiny period of 60 Sitting Days' prior to publication in February 2021.

CPRW replied constructively to the range of topics related to rural Wales, most of which were broad-brush, as befits such a comprehensive document.

However, there was one fundamental point that we found unacceptable and indefensible: the Government's novel and detailed proposals to address the climate emergency by generating 70% of Welsh electricity consumption from renewable energy (RE) by 2030. The draft NDF proposed a huge increase in RE **but on land only**, where large numbers of immense wind turbines (some up to 250m or 820ft high) and extensive solar farms would be concentrated in 15 Priority Areas spread across 20% of the Welsh countryside.

Whilst we supported the overall % target, the NDF ignored strong arguments - including those in other Government documents - for creating a much greater proportion from marine and offshore sources, which would remove the pressure on our irreplaceable resources of landscape and countryside in mainland Wales. CPRW therefore wrote directly and urgently to Ministers requesting that the Framework's renewable energy section was unfit for purpose and should be **withdrawn and completely re-written**. This brief but concentrated critique of the NDF's failings forms an Appendix to this letter.

The NDF did not even mention marine renewables, despite the commitment in the Government's Wales Marine Plan which envisaged a substantial role for green, offshore energy. and recommended that '**Ministers should take all available opportunities to promote the marine energy sector domestically and internationally**'. This was later reaffirmed by the Minister for Environment, Energy and Rural Affairs in September 2019 who stated '**Marine energy has the potential to be at the heart of ambitious plans for Wales to become a nation powered by renewable energy sources**'.

Since the NDF, huge financial resources have been made available for the development of far-offshore floating wind turbines, typically 44km (27 miles) off Pembrokeshire. Floating solar power is also seen as an emerging technology. To quote the Government's press release in September 2019: '**Wales can be a nation powered by marine energy**'. CPRW would agree, with the obvious proviso that it should be located carefully in order to minimise adverse impacts on marine biodiversity.

The strange absence of marine energy from the draft NDF has disappointed - and mystified - CPRW. The NDF seems to be looking backwards to outdated technology which will damage our landscapes while ignoring electricity from the sea which will provide sustainable energy and jobs in line with our unique Wellbeing of Future Generations Act in Wales.

The unbalanced signals sent by the draft NDF threaten far too many valuable landscapes inside the 20% of Wales proposed as the Priority Search Areas. Worse still, they have also encouraged opportunistic developers to start proposing a series of vast wind and solar schemes outside these areas - in cherished and vulnerable landscapes - wind on Pumlumon and the Radnor Forest, and solar on the Gwent Levels, which the First Minister is rightly anxious to conserve.

This unjustifiable and outdated approach needs to be removed from the NDF and replaced with one that puts the emphasis on the marine sector and brownfield sites. The so-called Priority Areas should be vastly reduced and re-named; other rural areas of Wales should not normally be considered for significant RE installations. By publishing a final NDF that puts the right technology in the right place, Wales would earn the gratitude of both its present and its future generations. We ardently hope that this fundamental change will be included in the third version text to be published next week.

If changes on these lines have not been included, we urge you to suggest amendments in the Senedd to implement our concerns. It is surely common ground between the political parties in Wales that we should respond to the climate emergency in a way that conserves the character and quality of our rural areas, which are also a major economic asset for tourism.

On behalf of CPRW's National Executive

Geoffrey Sinclair, Acting vice-Chair

The Welsh-language version of this letter will follow as soon as possible

Appendix – below:

National Development Framework – Welsh Government Consultation

7th November 2019

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



Chair: Peter Alexander-Fitzgerald

Contact details:

carys@cprwmail.org.uk

31 High Street, Welshpool SY21 7YD

01938 552525

CPRW was founded in 1928, this year celebrates its 91st anniversary, and is Wales' only organisation whose primary concern is the country's rural landscape and the land uses that support it. It is a membership charity (number: 239899) with its head office at 31 High Street Welshpool Powys and has 14 Branches throughout the country. Further details are to be found on its website (<https://cprw.org.uk>) including its National Executive Committee (NEC) and representative advisory Council.

The public consultation process on the National Development Framework

CPRW is preparing a comprehensive response to the Welsh Government's National Development Framework (NDF) consultation, which will be sent on 15th November.

In the meantime, on behalf of CPRW's National Executive Committee, I wish to make this **urgent interim submission** concerning the Renewable Energy (RE) assessment contained within the NDF and expressed in proposed Policies 10-13. CPRW has studied this text and associated background documents, and has reached the following conclusions:

- a) the RE assessment does not set out a clear statement of current and projected electricity generation and consumption, ignores the fact that Wales is a net exporter of electricity, and fails to quantify the level of additional output required to reach the target of 70% by 2030;
- b) it considers only onshore wind and solar technologies as contributors and ignores the role of other existing and viable sources over the target period, notably the draft Marine Plan's commitment to expand offshore wind;
- c) it is full of fundamental errors in defining the 15 wind and solar Priority Areas and fails to describe or assess potential impacts of its proposals upon them;
- d) although incredibly complex, it is not a fully-fledged document and has emerged into the NDF process without prior consultation or public debate;
- e) in its present form it is not therefore a Framework document conforming to the aims and scope of the NDF as a whole - and is **unfit for that purpose**.

CPRW accordingly submits that **the RE part of the NDF should be set to one side and postponed for subsequent re-drafting**. This would allow current responses to be considered, and its shortcomings rectified. Once it has reached an appropriate level of accuracy, comprehensive-ness and clarity it can be subject to a later dedicated consultation process. Only after that can it become capable of being included within the scope of the Framework.

Unless and until this is done, CPRW maintains that the NDF itself is devoid of an articulate central policy suite capable of rationally addressing the climate emergency. This is a debate in which we are eager to play a constructive role.

I would be grateful for a specific and timely response to this request from an appropriate officer of the Welsh Government.

Yours sincerely

[original version signed]

Peter Alexander-Fitzgerald