

Future Wales Update January 2021:

A cautious welcome to the CCERA Committee's scrutiny report

GS January 2021

In mid-October 2020 CPRW made a detailed submission to 'CCERA' - the Senedd Committee undertaking a formal scrutiny of 'Future Wales' (the updated and revised working draft version of the NDF).

We singled out what we saw as the major flaw in FW - the lack of integration between terrestrial and marine policies and targets for renewable energy (RE). We argued that as a result the agenda was distorted by the focus on onshore wind, and the exclusion of any marine component. We asked CCERA to recommend that the RE assessment be re-cast to fuse the NDF and National Marine Plan approaches within one separate document. This would have the double benefit of defining a rational and effective approach to the climate emergency and at the same time saving the landscapes of rural Wales from an unjustified sacrifice.

CCERA's report to Welsh Government was published in November 2020

<https://senedd.wales/media/apkdznzt/cr-ld13845-r-e.pdf>. Its relevant text (*in italics*), is interspersed with CPRW's comments (**in bold**):

5. Energy - Renewable Energy

Policy 17 – Renewable and low carbon energy and associated infrastructure

47. Future Wales states that the Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet future energy needs.

This implies marine as well as terrestrial, yet FW limits itself to the latter.

48. In 'Pre-Assessed Areas for Wind Energy', the Welsh Government has already modelled the likely impact on the landscape and has "found them to be capable of accommodating development in an acceptable way".

It is disappointing to see this repeated without qualification. There has not been a resource assessment or an impact assessment for the actual PAAs, which were only defined negatively in relation to external constraints.

Policy 18 - Renewable and low carbon energy - Developments of National Significance - Pre-Assessed Areas

51. Renewable UK Cymru and RWE Renewables believed that the renewable energy industry will be able to work within the revised policy framework provided by Policies 17 and 18 but they remained sceptical about the utility of the Pre-Assessed Areas.

This may mean that the trade lobby want the PAAs enlarged or, more likely, just scrapped. Although CPRW argues against the Areas taking up a disproportionate amount of RE onshore, their removal could lead to an undifferentiated flood of proposals throughout Wales.

Marine policy

57. Savills, *the Campaign for the Protection of Rural Wales*, and others argued that Future Wales should take more account of marine renewable energy potential. RTPI Cymru and RSPB Cymru argued that stronger links should be made between Future Wales and the National Marine Plan.

CPRW focussed on these linked points following its detailed critique of terrestrial RE in NDF/FW, but is disappointed that the disproportionate effect on the rural landscape is not also cited. However, our fundamental policy critique is taken on board in the Recommendations.

64. In reference to designated Pre-Assessment Areas, the Minister [in part of long submission quoted by CCERA] said that the Welsh Government has: “already modelled the likely impact on the landscape and found them to be capable of accommodating development in that acceptable way, ...”

As noted in our response to para 48 above, this is incorrect. Future Wales does not contain an area-based character assessment or an impact assessment within the so-called ‘pre-assessed areas’.

66. In response to a question about whether Future Wales should focus more on marine issues, the Minister said it was important to recognise that Future Wales constitutes the “national spatial plan for the land”. She then said it should be read alongside the Marine Plan ...

This exposes the structural flaw in FW and the error in its unilateral focus on terrestrial energy.

Our view [CCERA, interposed with Recommendations]

We are concerned that the shortcomings of the grid are impeding strategic energy development in Wales. We note the Minister’s comments that Future Wales will provide a basis for further discussions with the National Grid and distribution companies. We strongly believe that these discussions must happen as a matter of urgency.

Recommendation 11. *The Welsh Government should work with the National Grid, the electricity distribution companies and the renewable energy industry to develop a shared understanding of the strategic improvements which need to be made to electricity transmission and distribution infrastructure, including any new infrastructure required in mid Wales.*

This is welcome and necessary, and hopefully will encourage the creation of a unified off-shore/onshore grid.

Contributors from the renewables industry were sceptical about the merits of Pre-Assessed Areas for wind and solar in Policies 17 and 18. We believe that the Welsh Government should reconsider whether their inclusion in Future Wales is necessary.

Recommendation 12. *The Welsh Government should consider whether PreAssessed Areas for Wind Energy should be retained in Policies 17 and 18 of Future Wales.*

As noted in our response to para 51 above, the removal of the PAAs – stimulated by the renewables lobby - could make it even more difficult to argue against an undifferentiated

flood of proposals throughout Wales, as is already the case due to the removal of solar from the Areas.

We are pleased that Future Wales has been amended to provide a more supportive framework for renewable technologies in addition to wind and solar, and address storage and the onshore infrastructure requirements of offshore wind farms. These matters are addressed in Policies 17 and 18, and 24 & 32. However, we believe that the framework continues to place too much emphasis on onshore windfarms. We believe the framework should address the onshore opportunities associated with supporting offshore renewable energy developments. We note the comments made by the Minister in relation to the Marine Plan. However, we believe that the link between Future Wales and the Marine Plan should be clearer.

Recommendation 13. *The Welsh Government should amend the text of the final paragraph on page 99 of Future Wales to make clearer its intention that planning at the regional level should identify opportunities for all types of renewable energy developments.*

Recommendation 15. *The Welsh Government should consider whether criterion 2 of Policy 18 should require the application of the test of ‘no unacceptable adverse visual or noise impacts on nearby communities or individual dwellings.’ It should also consider whether cumulative impact should be a consideration in the assessment of other potential environmental impacts.*

Recommendation 16. *The Welsh Government should ensure that Future Wales and the National Marine Plan are well aligned and complementary in relation to renewable energy developments. Future Wales should provide guidance on the protection of potential cable landfalls for offshore renewable energy developments.*

These recommendations, in combination, are very heartening. It remains unclear as to whether they have been fully thought-through, leading to a major re-think of FW such that a further re-consultation takes place.

Recommendation 14. *In monitoring Future Wales in relation to progress in delivering renewable energy, regard should be had to the target of 70% of electricity consumption being generated from renewable sources by 2030 and the targets required to achieve net-zero carbon emissions.*

Regrettably, this fails to cross-refer to the need to incorporate both terrestrial and marine technologies – as expressed elsewhere by CCERA.

Recommendation 17. *Future Wales should include a clear statement that it is the highest tier of the development plan, against which proposed Developments of National Significance require to be assessed.*

Subject to reservations above, CPRW supports this recommendation.

Footnote:

Earlier responses to the NDF itself are available on the CPRW website:

Senedd Debate 2020.09.29:

<https://cprw.org.uk/news-and-events/ndf-debate-in-the-senedd>

<https://cprw.org.uk/cms-data/resources/GS%20Notes%20on%20Senedd%20debate%20on%20NDF%202020.09.29.pdf>

Open Letter to Members of the Senedd 2020.09.15:

<https://cprw.org.uk/news-and-events/open-letter-sent-to-members-of-the-senedd-regarding-the-ndf>

<https://cprw.org.uk/cms-data/resources/CPRW%20Open%20Letter%20to%20MSs%20re%20NDF%20002.pdf>

The story so far! 2020. 01:

https://cprw.org.uk/cms-data/news/renewable-1989416_1920_1.jpg

<https://cprw.org.uk/cms-data/resources/NDF%20update%20January%202020.pdf>