

P-06-1383 Pause onshore wind & solar projects >10MW until the full potential of off-shore wind is included, Correspondence – Petitioner to Committee, 05.12.23



Petitions Committee
Welsh Parliament
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5th December 2023

Dear Jack Sargeant MS, Chair of the Petitions Committee

Re: Petition P-06-1383: Pause onshore wind & solar projects >10MW until the full potential of off-shore wind is included.

Supplementary contribution

CPRW is grateful for the opportunity to provide this additional information to support our petition and provide feedback on the Minister's written correspondence to the Committee Chair dated the 15 November 2023.

Rational behind our petition

To reach net zero, Wales needs, in addition to currently built renewable generation, a further 6 GW installed capacity in the Irish Sea off north Wales (after Mona), and 3 GW in the Celtic Sea (derived from "Review of Wales' Renewable Energy Targets" Welsh Government consultation document and "Future Energy Scenarios" by the Electricity System Operator). This is less than the total capacity possible. Obviously less is needed (ca 3.5 GW) to meet the Welsh Government's 2035 target of 100% consumption from renewables, and this level of generation should be possible by 2035 given sufficient political will. This level of generation is not possible from onshore wind alone, and there is already a significant dependence on offshore wind.

With the revised U.K. National Policy Statements (particularly EN-1)¹, including classifying offshore wind as a "critical national priority", given the highest level of support in the U.K. planning system, and the U.K. Government's target of 50 GW offshore wind by 2030 and 5 GW floating offshore wind in the Celtic Sea by 2035, it is clear that the UK Government is reliant on offshore wind.

Offshore wind is more popular with the public (see DESNZ Public Attitude Tracker)², as well as being more efficient, and there is currently little experience of onshore wind of the size proposed in Future Wales³ in either England or Wales, and so onshore wind may further decrease in popularity, fuelling

¹ Overarching National Policy Statement for Energy (EN-1), UK Government Department for Energy Security and Net Zero (March 2023) : https://assets.publishing.service.gov.uk/media/64252f3b60a35e00120cb158/NPS_EN-1.pdf

² UK Government department for Business and Trade DESNZ Attitude Tracker: <https://www.gov.uk/government/collections/public-attitudes-tracking-survey>

³ Future Wales: A National Plan 2040: <https://www.gov.wales/future-wales-national-plan-2040#FutureWales:TheNationalPlan2040>



climate crisis scepticism, when more people become aware of the size of turbines (up to 250 m blade tip height).

The analysis behind Future Wales did not conduct a specific evaluation of ability of the landscape to accommodate change within the pre Assessed Areas, but did give an opinion that the landscape would have to accept change. The renewables energy policies were “shoe horned” into Future Wales at the last minute, and public engagement was minimal. The current rollout of projects does not align in any way with the recommendations recently given by the National Infrastructure Commission for Wales (NICW).⁴ For example, the NICW report recommends engaging the public to co-design “future energy landscapes” before developers get involved, representing the opposite of what is happening in practice.⁵

Feedback on the Minister’s letter

We agree with the Minister that the climate change emergency is a serious threat and that we need to ensure that we bring an end to the burning of fossil fuels. We also agree that we need to harness the renewable potential of Wales for our energy needs, that we need a range of renewable technologies of different types and scales, and that wind energy, along with solar are the most mature technology and these are likely to make the most significant contribution to our energy needs. We acknowledge and understand that a number of key levers that the offshore wind industry need lie in the hands of the UK Government.

However, we do not agree with the level or scale and cumulative impact (installed MW and height) of onshore wind that Future Wales proposes. We have concerns regarding the criteria used to select appropriate locations, and the fact that HM Treasury “green book”⁶ analysis is not used to determine the impact on “consumed” public assets (primarily visual amenity). We are also concerned that support from impacted communities is not required.

Whilst acknowledging the climate crisis the Minister’s letter fails to mention the nature emergency. We do not believe that the right balance is currently being struck between addressing the need for renewable energy developments whilst taking proper account of their environmental impacts, individually and cumulatively. Their impact on landscape, forestry, farmland, habitat and biodiversity loss is not being properly considered and we are seeing multiple applications for developments in inappropriate locations.

The Minister’s letter states that there is a robust planning framework. While all planning decisions for renewable technology, including onshore wind, are required to take into account environmental factors and public feedback, ultimately it is a single Minister who makes the decision, who is not required to take regard of any advice and who has no publicly accepted guidance or criteria to draw

⁴ Preparing Wales for a Renewable Energy 2050 A report from the National Infrastructure Commission for Wales (NICW) October 2023: <https://nationalinfrastructurecommission.wales/wp-content/uploads/2023/10/NICW-renewable-energy-report-English.pdf>

⁵ ‘Future Energy Landscapes’ (FEL) methodology to engage with communities: <https://www.cse.org.uk/my-community/community-projects/future-energy-landscapes-community-consultation-method/>

⁶ The Green Book Guidance, HM Treasury (2022): <https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government/the-green-book-2020>



upon. The recently published “Designing for Renewable Energy in Wales” by The Design Commission for Wales⁷ does not provide this (and does not attempt to).

As raised in evidence to the Climate Change, Environment and Infrastructure Committee on the Infrastructure Bill on the 28th of September⁸, and highlighted in the media⁹, we are concerned that Natural Resources Wales is unable to fulfil its duties and functions in relation to its role as a statutory consultee in the planning process, due to resource constraints.

The Minister’s letter states that she does not support the call for a moratorium on onshore wind or solar farms. CPRW are not asking for a cessation or ban on all onshore wind, merely a pause while the enormous potential of offshore wind is properly assessed and planned for, with smaller scale, community schemes given a focus onshore.

We would ask the Minister to consider again, particularly in light of the revised National Policy Statements¹⁰ and National Infrastructure Commission for Wales (NICW) report, neither of which were available when this petition was launched, but we feel further support our request. We also ask that the Minister can assure us that HM Treasury “green book” analysis will be used to help inform all planning decisions.

Yours sincerely

Dr Jonathan Dean

Campaign for the Protection of Rural Wales

⁷ Designing for Renewable Energy in Wales, Design Commission for Wales (November 2023):
<https://dcfw.org/wp-content/uploads/2023/11/Designing-for-Renewable-Energy-in-Wales-1.pdf>

⁸ Record of proceedings. Senedd Climate Change Environment and Infrastructure Committee, 28th September 2023: <https://record.assembly.wales/Committee/13470>

⁹ Natural Resources Wales doesn’t have the resources to do its job properly, Nation Cymru article:
<https://nation.cymru/news/natural-resources-wales-doesnt-have-the-resources-to-do-its-job-properly/>

¹⁰ Addressing the nature emergency through the planning system - Updated National Planning Policy for Chapter 6 of Planning Policy Wales. Letter to Planning Authorities from the Minister for Climate Change Julie James 11 October 2023: <https://www.gov.wales/sites/default/files/publications/2023-10/addressing-the-nature-emergency-through-the-planning-system.pdf>



Annex 1: Petition P-06-1383: Pause onshore wind & solar projects >10MW until the full potential of off-shore wind is included.¹¹

To prevent widescale and needless damage to the Welsh countryside, we call upon the Welsh Government to place a temporary moratorium on all onshore wind and ground based solar developments over 10MW, until Future Wales 2040 and the Welsh Government's renewable energy targets are updated and incorporated with Wales Marine Energy to ensure that the full potential of offshore wind, rooftop solar, and other emerging energy sources is recognised as a critical priority to combat climate change

Wales presently produces 30 Terra Watt hours (TWh) of energy (55% of that from renewables) whilst using only 14TWh, however, demand is estimated to increase to 45TWh by 2050.

Wales has massive potential for far offshore wind (both fixed and floating) with projects proposed for offshore wind projects, in the Irish and Celtic Sea combined forecast to generate at least 100 TWh of energy.

Estimates also calculate that up to 50% of Wales energy consumption could be met through rooftop solar on houses, businesses, and covered car parks. Yet neither the full potential of offshore wind nor rooftop solar is being calculated into Welsh Government policy. The Minister for Climate Change admitted to CPRW it wasn't, stating that their policy document, Future Wales, had not been updated in three years. We call for policy to be updated to include the full potential of offshore wind, rooftop solar and other emerging technologies to ensure we sacrifice the least amount of countryside and farmland.

¹¹ Petition P-06-1383: Pause onshore wind & solar projects >10MW until the full potential of off-shore wind is included: <https://petitions.senedd.wales/petitions/245471>

