

Climate Change, Environment, and Infrastructure Committee: correspondence received via e-mail from Non Davies, on behalf of Moelfre Residents, regarding the Welsh Government's Future Wales renewable energy policies – November 2021

e-mail received 23.11.21

Bore da Llyr

We write to you as our regional Senedd Member and specifically in your role as Chair of the Climate Change, Environment & Infrastructure Committee. Despite extensive correspondence in this regard and our meeting of 21 October 2021 we remain extremely concerned about fundamental aspects (as previously detailed and in summary below) of the Future Wales Plan 2040:

- Policy 17 ac 18: - the fact that the HM Treasury Department's Government Guidance on Appraisals and Evaluations (The Green Book), a statutory mandatory requirement which evaluates and quantifies the value of 'natural capital' such as landscape and therefore the value of the loss of landscape, was not applied.
- The absence of evidence presented to date which supports the claim that sufficient compensatory mechanisms were applied thereby negating the need to apply the Green Book.
- The delay in developing promised Guidance to accompany FW Policy 2040, a reasonable expectation when making life changing decisions
- That decision making on these Developments of National Significance can ultimately be determined by one individual's subjective interpretation of the terms 'acceptable' ac 'unacceptable' ('no adverse impact unless there are no less damaging alternative solutions').
- In our opinion all these elements culminate in our claim that The Future Wales Plan 2040 is ultimately flawed and as a result our human rights have been breached; Under Article 6 'right to a fair trial' by limiting our rights and the basis upon which we can object to developments on the basis matters such as of loss of 'natural capital' and the resulting adverse impacts of this including the material loss of value of homes and businesses and personal loss of wellbeing; and under article 8 'right to respect for family and private life' due to the flawed and disproportionate impact of this WG policy.

Further and in light of recent media coverage (Western Mail 20 November 2021) referencing Bute Energy, in order to maintain public confidence, we formally request that the formulation & scrutiny of FW Plan 2040 - along with its emerging adverse consequences across Wales – be reviewed and that this matter be raised at the next

meeting of the Climate Change, Environment & Infrastructure Committee which next meets on 25 November 2021 and thereby tabled for future consideration.

We look forward to a reply,

yours sincerely

Non Davies ar ran Preswylwyr Moelfre

e-mail received 29.11.21

Bore da

oes modd cynnwys y llythyr uchod gyda'r dogfennau eraill a ddanfonwyd ac a dderbyniwyd ar gyfer trafodaeth ar 9 Rhagfyr 2021/ *Please include this letter with the other documents in relation to the same subject submitted to and accepted by the Climate Change Committee for discussion on 9 December 2021:*

- Letter Clive Goodridge
- Letter Residents Safle Moelfre
- Letter Dr Jonathan Dean
- Joint Letter Western Mail (26.11.21) & Daily Post (29.11.21) - in addition as below

Diolch am eich cydweithrediad / thanking you for your co-operation in this matter

Yours sincerely / Yn gywir

Non Davies

Letter Published Western Mail 26 November 2021 & Daily Post 29 November 2021

Future Wales renewable energy policies

When the Welsh Government introduced policies on renewable energy to the final draft of the National Development Framework, now enacted as Future Wales, they did so without subjecting those policies to analysis using the mandatory H M Treasury guidance known as the Green Book. Although an Integrated Sustainability Assessment was performed for the whole of Future Wales, no policy level analysis was performed, and some key features of the Green Book approach missed out.

The Green Book requires effects on the value of "natural capital" to be included - this is the value society gives to less tangible assets such as landscapes, habitats and environments. While never as precise as estimating infrastructure costs or revenue streams, it crucially translates impacts on landscape etc into quantitative terms to

weigh up against more tangible costs and benefits. Environmental assessments are usually qualitative, but often money wins, and descriptions, and landscapes, loose.

Also missing from Future Wales are the renewable energy guidelines on acceptability, promised during the public consultation - essentially the "rules of the game" for both developers and impacted stakeholders. We understand from the minister there is no deadline for these to be produced, although proposals under these policies will be submitted soon.

We strongly believe that the guidelines, including the need to assess the impact on "natural capital" value, should be available before the first application under these policies is submitted in the first half of next year. With the right "rules" then maybe the right decisions will be made, for the right reasons, about such Developments of National Significance like Y Bryn Onshore Windfarm and numerous other wind and solar developments. We believe that the renewable energy policies, and any emerging unintended consequences on communities across Wales, should be reviewed.

Yours sincerely

Non Davies (Safle Moelfre Conwy)

Joseph Jones

Dr Jonathan F Dean

e-mail received 30.11.21

Pnawn da

Oes modd rhoi sicrwydd na fydd pryntiant gorfodol yn digwydd os gwelwch yn dda - **fy mhwyslais isod**? Rheswm arall pam fod angen systemau tryloyw a chanllawiau cydnabyddiedig wrth benderfynu

33. P.111

34.

35. 4.6.35 The Welsh Government recognises the contribution that smaller and community scale developments will have to our future energy system, however it is not envisaged that they will produce enough renewable energy to meet our needs. We therefore need to plan proactively for larger scale developments which will make a larger contribution to our targets.

36. 4.6.36 The Arup report was commissioned by the Welsh Government in 2018 and used a commonly-used methodology for mapping constraints to identify the most suitable areas for large scale wind and solar. These constraints were

discussed and agreed with stakeholders through four workshops, which occurred in the autumn of 2018, before modelling of the areas commenced. Representations have queried the additional use of residential properties as an additional constraint along with road, railway and river corridors. Arup have undertaken additional modelling which demonstrates that this would rule out much of Wales and is therefore it is unfeasible to do this. **This is particularly so where residential properties could be purchased or form part of an ownership agreement to make a scheme acceptable to nearby residential properties, therefore requiring a smaller or no buffer to be used.**

edrych ymlaen at eich ateb ysgrifenedig yn dilyn y cyfarfod
yn gywir
Non Davies