

ROCP 51, Climate Cymru

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Adolygiad o flaenoriaethau'r Pwyllgor ar gyfer y Chwchedd Senedd | Review of the Committee's priorities for the Sixth Senedd

Ymateb gan Climate Cymru | Evidence from Climate Cymru

Your views

1. What are your views on the Committee's three strategic priorities: Climate Change; Sustainable Communities; and Protecting and enhancing the natural environment?

The Climate Cymru network is made up of 370 cross-sector organisations and 15,000 individuals who are brought together by common values and a shared desire for urgent, fair action to address the climate and nature emergencies.

The points below were put forward by a diverse range of Climate Cymru partners as part of a consultation process. Whilst many engaged and contributed to this process, with general support for most of the content, not all points are supported by all partners.

Priority 1

On climate change, we think the Committee need to expand its focus beyond CO2 to methane, which is a powerful climate accelerant responsible for around 30% of warming since the industrial revolution - and the world is waking up to the fact this needs to have a far greater focus than it's received historically in terms of measurement and inclusive in climate targets alongside CO2. This is obviously a factor we are conscious of, as coal mines themselves are significant contributors to global methane emissions.

We are pleased to see just transition is in your priority document, an area that our network is working to promote on a daily basis. We wish to see legislation introduced to ensure we reach a just transition by 2035.

A *just* transition cannot be achieved unless people and communities are at the centre of our energy system. A *just* transition is not possible with the current

energy model. The whole system needs to change. We require a system that would provide people with the opportunity to use local natural resources to generate and trade power from community-owned renewable energy generation, storage and distribution assets.

There are barriers preventing local trading at scale, which has been exemplified by our partners in Community Energy Wales. A transition that overcomes these barriers - of market regulation and distribution infrastructure (e.g. the National Grid, a private, profit-driven company) - will significantly reduce the injustices in the current energy system.

People should be the primary beneficiaries of efficiencies achieved through smart technology, grid balancing and reduced use at peak times (Energy Local is an example of a concept that under different market conditions could do this). With access to their own data, people should be able to make the most efficient use of local infrastructure by matching demand to supply.

We want to maximise citizens' involvement and shared participation in energy decision-making and governance. People's active involvement in their local community energy groups helps to do this, and Community Energy Wales are helping to support this process.

Priority 2

We are pleased to see that your priority document only includes transition, an area that our network works to promote on a daily basis. We wish to see legislation introduced to ensure we reach a just transition by 2035.

A two tier energy market

Large scale projects both on and off-shore will need to be developed. These will require significant investment and new transmission infrastructure.

However, to achieve a just transition, we advocate the development of a two tier market, with community renewable energy, tier one, supplying as much local energy demand as possible. Energy that is consumed locally to where it is produced can be produced at a significantly lowered price and in a way in which behaviour change drives down demand. This 'tier one' would help to build maximum resilience and energy security into our energy system.

'Tier two' would be the larger commercial renewable energy sector and its developments. In the urgent context of climate change, this tier needs to be

developed simultaneously alongside tier one, but Tier two must not be allowed to encroach on the democratising power of Tier one.

For people and communities to be able to participate in both Tier one and Tier two development on equal terms, examples of shared ownership projects between local communities and larger renewable energy developers will need to evolve rapidly to secure this element of a just transition.

Public / community partnerships

Community energy groups would be able to install generation at scale if public bodies committed to buying their energy from them. Local councils, Welsh government and other public bodies should prioritise community energy procurement in recognition of the added value from our sector. This can be achieved through a flex power purchase agreement, sleeving contract and / or a larger scale Energy Local agreement.

We also need to ensure that any just transition includes engaging with sectors that are carbon heavy at the moment, and supporting companies to transition to green energy and green businesses. Tata Steel and others must be in the room for such discussions, as well as representatives of Trade Unions and communities. We want to keep coal in the ground, and create a thriving green economy for Wales, but we have to do this with communities, and not do it to communities.

Priority 3

In relation to coaling, mapping, inspection, and proper restoration of former opencast coal mining sites that pock-marks the South Wales landscape is a necessary condition to protect and enhance the natural environment. Research from [Coal Action Network](#) on this marks a start, and underscores the ongoing harm these sites and their incomplete/substandard restoration cause, but the research needs to be taken further. Communities need their land to be restored and for companies to be held to account. We request that the Committee carries out more work on this, especially in light of recent events at Ffos y Fran in Merthyr. We do also recognise that some of these tips have become important [wildlife habitats](#). The committee could identify ways in which the Welsh Government could balance community safety against possible biodiversity loss.

You will be aware that we have run a Nature Positive Campaign in Climate Cymru. In light of the planned, proposed and promised policy development towards the “Environmental Governance and Biodiversity Targets Bill” (Nature Positive Bill) by the Climate Change Minister, the urgency of action required to address the nature

crisis and the escalating scale of action with each and every delay cannot be underestimated.

Julie James MS told Climate Cymru, *'Policy development is underway and a White Paper setting out the full scope of the Bill and its legislative proposals will be published by January 2024. A consultation on the Bill will follow the publication of the White Paper. I am committed to using the White Paper as a way of engaging people in the debate about biodiversity and making the Bill, when it comes before the Senedd, as successful as it can be and one that commands the widest possible support. I very much welcome Climate Cymru, and your signatories, input and feedback to this consultation and in shaping the delivery of our legislation to be nature positive in Wales.'*

We urge you as a committee to prioritise scrutiny of the policy development of the 'Environmental Governance and Biodiversity Targets Bill' to ensure this meets the needs of nature and that scrutiny is not a hindrance to rapid policy development and the presentation of a Bill suitable to the task at hand.

2. To what extent are the Committee's three strategic priorities still relevant, reflecting on social, economic and environmental developments since they were set at the start of the Sixth Senedd?

The strategic priorities are still relevant, and we understand that you are trying to demonstrate work in three distinct areas, but some themes cut across all priorities. Planning is one of them – and it's urgent. It's raised under sustainable communities, yet planning within Local Authorities cuts through so much of the work under all three priorities.

For example, priority 3, "protecting and enhancing the natural environment", really means protection from developers and the planning system. There's much that needs to be done with regards to strengthening or doing away with SPGs, TPOs and SSSIs, all of which currently allow planning applications to circumvent guidance.

3. What are your view on the Committee's detailed priorities/outline programme of work for Years 3 to 5 of the Sixth Senedd (set out in its report, Priorities for the Sixth Senedd?)

Irrespective of the desire to increase "capacity, resources and specialist skills", developers will still have their way if legislation isn't in place to protect. In your

document, you stress that this is part of your 3- 5 year plan. Leaving it until years 3- 5 to review the planning framework is much too late. We want to see this happening from the get-go. We already know it's not fit for the purpose of achieving outcomes in the key areas.

You state that you will continue your work on renewable energy. We would like more detail on this, especially given the announcement of two public energy companies in Wales (one called Ynni Cymru that focuses on community renewables as part of the collaboration deal with Plaid Cymru, and another separate announcement on a public energy company to decarbonise the energy sector).

We wish to be far more involved as a sector in the progress of this work. We wrote to the Climate Change Minister alongside Cwmpas Wales last year, asking for dialogue about the shape of the new energy company, for example, for the Welsh Government to consider a mutual set up for its structure. Yet we have not seen progress.

Also, regarding renewable energy, it would be good to focus on encouraging more developers to take up Welsh Government's policy support of Local and Shared ownership of renewables. The aim is to retain more value from these schemes in Wales, and gain more public engagement in climate action - so that it's not just developers who are 'doing this to us'.

There are a couple of examples of projects which are in progress already. These involve RWE and Coriolis/ESB. The RWE projects have been led by CEW and include two sites. AAT/NPTCVS and BAVO are involved in the Bryn project. Both projects have been out to community consultation and are due to be formally submitted into planning. It's very positive that Wales is leading the way on this and it's a massive opportunity to get more renewables installed, and retain more ownership/benefit in Wales. We want developers to realise that local and shared ownership of renewables is best practice in Wales, and not doing it will jeopardise their chances of getting planning consent.

We would welcome some work on the planning process for solar development in Wales. We understand that some companies are facing challenges in progressing development due to the nature of the land. A piece of work researching this, and the potential barriers, would be welcomed.

We would like the Senedd to lobby Westminster to facilitate local energy projects to enter the energy market as local 'clubs,' providing a beneficial tariff to power users who balance their consumption within local generation - and local

generators with a higher market return on energy they get their members to use locally. There is a campaign for this ([Power for People](#)) and amendments proposed for the UK Energy Bill that would compel energy supply companies to structure and support such tariffs.

4. To what extent are the Committee's detailed priorities/outline programme of work still relevant, reflecting on social, economic and environmental developments since they were set at the start of the Sixth Senedd?

They are still relevant, and we would say that there should be added intensity to this area of work given the worrying rise in incidents the World over as a result of climate change. To that end, it would be good to see a developed priorities programme assessing the rise in climate refugees and our responsibilities with regards to climate justice on an International level.

5. Are there any other matters related to the Committee's priorities/work programme/ways of working that you would like to comment on?

We are always more than happy to facilitate members of the Committee to visit the work of partners within our network. We also welcome opportunities to give evidence to the committee, or attend roundtables or workshops that you may arrange in the future.

We understand that you may be scrutinising more legislation as a committee, and that time may be taken away from policy for such pieces of work. Nonetheless, we believe that it would be positive to see more cross collaboration with other committees, as issues pertaining to climate change are not the sole responsibility of one Senedd committee.

For example, we see this especially regarding matters pertaining to social justice. If we improve the energy efficiency of our houses, and increase renewables, we will be able to ensure that people's quality of life improves, leading to a decrease in those who are fuel poor, or who live in old, leaky homes. Therefore we would welcome work between the committee leading on housing on such topics.

Also, an important piece of work could be carried out on the effects on people's mental health due to climate anxiety, with your committee working alongside the Health Committee, for example. The Royal College of Psychiatrists, another of our partners, has carried out research in this area, to be released soon, showing the rise in mental health problems emanating from the climate emergency.

Naturally, there is also a role for the Education/ Economy committees to play in assessing the need to diversify skills for a future transition to a green economy, as well as potentially looking at the devolution of funding for the Crown Estate in regards to renewable energy developments.

We wish for your committee to look into the system of providing permissions for solar panels on people's housing in Wales. When you needed to apply for planning permission to put solar panels on your roof, not so many applied to do so. Once it was permitted development (with criteria to ensure they were flat to the roof) then many more were installed, helped by the tariff.

Any community that wishes to meet their own reasonable energy needs renewably should be entitled to do so, so long as no significant harm is done to others. To place planning permission in the way makes this endeavour impractical for reasons such as:

The cost of applying

The time and cost to do a full EIA (environmental impact assessment) before installing as seems to be required.

The subjectivity of decisions such as what 'changes the character' of an area gives power to the authority to potentially reject an application.

The requirement to apply for planning even to install an anemometer to measure the wind for a year. This is an object about the size and shape of a large crow on a pole that measures the wind.

For hydro permissions there are the costs of extraction and impoundment licences and the complexity, costs and duration of the ecological surveys required. The potential impacts of extracting and returning water, and of the depleted reach in between are real and need controlling.

With the amount of applications in Wales this might be a full time job for one person in a good year, visiting approx. one hydro a week. If the cost of applying were around £1000 per hydro to pay their costs, this would make them practical. Instead the costs go to keep a large number of people who never leave the office except on enforcement visits.

If community renewables were permitted development, and the criteria for permission were sensible, applicants would only need to pay if they breached the conditions, thereby paying for the cost of inspection.

The next round of barriers are the grid connection restrictions and costs. Why not pilot permitted development for community renewables in communities of x sq kilometres that agree to use this option, with the support of relevant stakeholders, e.g. the tourism businesses in the community.

If you want people to embrace climate action, let them have agency, to be able to live without fossil fuels. To call on everyone to take action on climate and then make it unlawful to have energy without them is unacceptable.

The Welsh Government is consulting on its [heat strategy for Wales](#), the consultation closes on November the 8th. The committee could do some sessions on this, and use it as a means to provide evidence from the committee to this consultation. This is an important piece of work if we are serious about decarbonising our houses, businesses and industries.

6. Other information

No response.
