

1. Are you responding as an individual or on behalf of an organisation? If you're responding on behalf of an organisation, please provide the organisation's name.

Individual

Organisation

Name of organisation: **Brecon and Radnor Branch  
Campaign for Protection of Rural Wales.  
Secretary: Dr Christine Hugh-Jones**

We've identified some potential actions to adapt to climate change over the next five years but want to know how you think we should take these ideas forward and what else could be done.

When we refer to 'actions' in this consultation, we mean those detailed in Part 2 of the Climate Change Adaptation Plan for Wales.

2. Overall, to what extent do you agree with the potential actions for adapting to climate change set out in this document? (1=completely agree, 5=completely disagree)

1

2

3

4

5

Please explain the reasons for your answer:

3. Please tell us if you have any ideas for how we should deliver the potential actions for adapting to climate change.

These comments were prepared by members of BRB-CPRW committee. We welcome the opportunity to respond to this consultation. Our comments for the most part address the Draft Climate Change Adaptation Plan for Wales as a whole and relate to its deliverability. We have also made a few particular comments on the content which do not relate precisely to the questions below. For this reason we have set out our entire response here.

In relation to the foreword, which sets out the rationale underlying the need for climate change adaptation, it is necessary to emphasise the entire lack of any certainty as to what climate change might bring in the way of stresses, additional to those already created by human activity, on the natural environment on which we all depend. For this reason, it should be made absolutely central to the Government's strategy, and clearly set out as so in this document, that the achievement of resilient ecosystems, and the protection of air, water and soil quality, have the very highest priority. These goals must not be compromised or made subsidiary to the pursuit of other Government policies.

We have two fundamental concerns which lead us to doubt the government's ability to deliver many of the positive initiatives set out in the draft document.

- The first is that there are proposals within this draft which conflict with other Government strategies, and we cannot be confident that climate change adaptation goals will take priority where conflict arises.
- The second relates to the Government's willingness to commit public spending to the achievement of ambitions set out within this draft, particularly where that involves making finance available to public bodies to enable them to take on new responsibilities, or adequately perform existing roles which should contribute to climate change adaptation goals.

Policy conflict: To give just one obvious example, recent experience in Powys, and in particular the permission given to the Hendy Wind Farm in a very environmentally sensitive location, makes us very doubtful that any environmental (or heritage) concern will in future hold any weight whatsoever when weighed in the planning balance against generation of renewable energy, at whatever scale.

In the case of the Hendy Wind Farm, the protection of biodiversity, landscape and heritage assets (and tourism and residential amenity) were all dismissed by Wales' Environment Minister as insufficient to outweigh the production of a nationally insignificant amount of renewable energy. Potential risk to freshwater ecosystems and designated sites was also given no real consideration. The credibility of the Government's stated environmental aspirations is seriously undermined by this decision.

At the same time the weakening of protections in PPW10, as compared to previous editions, for example for ancient woodland and heritage assets, and the relentless centralisation of the planning system, suggest that the Hendy Wind Farm decision reflects future intention rather than being a one off aberration.

If this assumption is correct, then given the scale of the Government's ambitions for renewable energy production and the policy preference for the most damaging industrial scale developments, the environmental goals set out within this climate change adaptation document will not be achievable. In this case, the future for Wales' adaptability to climate change, as well as for the deliverability of ecosystems services, key to the proposed new land management policy, is very bleak indeed.

Public spending: Many proposed actions within this document have costs. For example, proposals include the undertaking or commissioning of new research, and the document emphasises the importance of the enhancement by NRW of the integrity of N2K sites. At the same time, the achievement of many of the environmental ambitions will rely heavily on the ability of local authorities to direct development to the most suitable locations, not to mention the willingness of the Welsh Ministers to do the same.

NRW and local authorities are already struggling financially to fulfil existing duties and responsibilities. With current reduced budgets, NRW's enhancement of protected sites, for example, is simply not happening. Local authorities, under similar budgetary pressure, are paring services to the bone and cutting staff. Powys is probably not alone in lacking inhouse expertise to comply with its S6 Ecosystems Duty, or adequately inform planning decisions.

Without the necessary funding, much of the aspiration in this document is incapable of being fulfilled.

Specific points:

The importance of peat restoration is not just about carbon budget targets but also its public goods value as surface water storage and control. We feel it is essential that all peat soils are not allowed to deteriorate if we are to optimise their benefits. We are concerned that the upland areas where deep peat is most common are also targets for renewable energy schemes, the infrastructure for which have very negative impacts on the peat soils. There is over emphasis on restoration of deep peatlands at the expense of ensuring all soils are in optimum condition for both fertility and carbon sequestration.

AIR QUALITY: The importance of rural air quality issues, in particular ammonia emissions from intensive farming, is fundamental. There are huge environmental impacts from these emissions, and serious implications for public health, from the ammonia itself and its role in formation of fine particulates. Environmental impacts could not be more important and nitrogen and phosphorus pollution are, with biodiversity loss, the two highest risk exceedances of planetary boundaries, considerably higher risk than climate change itself, according to the Stockholm Resilience Centre<sup>1</sup>. These planetary boundaries are intended to underlie the principle of sustainable development and are therefore key data which should inform Government strategy.

Nitrification threatens plant diversity and soil ecosystem health, in turn essential to carbon sequestration. It has been proposed that post war agricultural practices have contributed to climate change and that adoption of practices contributing to soil and plant health and diversity may have considerable potential for mitigation<sup>2</sup>.

We welcome the First Minister's recent acknowledgement to the Senedd of the importance of rural air quality issues. We are waiting though to see this reflected in

Government policy on planning and air quality, and so effective measures to restrict ammonia emissions are not in place.

Plantlife advises that simple measures such as slurry store covers and improved housing floor systems in farm units can dramatically reduce ammonia emissions. Without the rapid roll-out of such measures, the report warns that Wales will fail to cut 8% of ammonia emissions by 2020 and 16% by 2030 (compared with 2005), as required by the UK's legally-binding targets under EU and international law. Emissions could even exceed the 1990 baseline, causing even greater damage to wildlife, people and our climate<sup>3</sup>.

**BIODIVERSITY:** Biodiversity loss and its reversal should be at the heart of the Government's environmental strategy<sup>1</sup>. At present the planning system is failing to deliver the maintenance and enhancement of ecosystems which would support the reversal of biodiversity declines. Some useful mechanisms are there, for example the S6 Ecosystems Duty, but the means are not – see our comments above on public funding. Local authorities must be put in a position where they can deliver on this ambition and this will require funding for the necessary inhouse expertise, together with training.

Hendy Wind Farm is a prime example of a development which will cause considerable habitat loss, degradation and fragmentation. Neither NRW nor Powys Development Management took any action to ensure that habitat restoration and enhancement would be required to compensate for this loss. There are no mitigation requirements. We do not know if the Welsh ministers were aware of this when they approved this development, against the Inspector's recommendation. However, it is clear that the Welsh Ministers drive to meet renewable energy targets has created a situation where public bodies do not see leadership from Welsh Government, or feel supported by Welsh Government, in actions to reverse biodiversity declines.

See also recent UN report on the importance of biodiversity to food supply, sustainable development and ecosystems services<sup>4</sup>, and key message (p17) "Biodiversity for food and agriculture (BFA) – including domesticated crops and animals, harvested forest and aquatic species, and the associated biodiversity found in and around production systems – is indispensable to food security, sustainable development and the supply of many vital ecosystem services."

**ANCIENT WOODLAND:** It is not set out what sort of woodland Welsh Government intends should make up the 2000Ha p.a. which is intended to be created. Commercial forestry and native woodland are poles apart in terms of what they can deliver in environmental benefits and the biodiversity they will support. We note that the reference to native woodland on p41 is simply an observation and is not set out as any form of objective.

In all sections of this document which discuss woodland we would like to see specific reference to the importance of the protection of all Welsh ancient woodland, a surprising omission from the text as it stands.

Wales contains ancient woodlands which escaped the worst industrial pollution and have a higher biodiversity value than many English woodlands. Welsh ancient woodlands are in some cases the last refuges of rare species. We are very concerned, as are the Woodland Trust, at the apparent weakening of protections for ancient woodland in PPW10.

**FLOOD DEFENCES:** In recent years there has been some concern at the installation of concrete flood defences of the kind which channel waterways causing them to flow faster and possibly exacerbating flood problems downstream. We trust that thinking in terms of suitable flood mitigation measures has evolved, and that current thinking is more along the lines of allowing waterways to occupy their natural space and keeping floodplains clear of vulnerable development.

**WATER QUALITY:** Another fundamental to achievement of the goals within this document, and we are concerned that pressure is being applied to water down the government's proposed new measures to protect water quality. Long term thinking requires that the Welsh Government do not compromise on environmental protections. Where this may impact on farm viability – other mechanisms to address this must be found.

**MONITORING AND EVALUATION:** Given the interplay of the new land management scheme and the aspirations of this plan, we would recommend that upland restoration schemes funded out of the public purse should be looked at in terms of delivery against their public good objectives. This process should be public and transparent and may be useful to inform future projects.

<sup>1</sup> <https://www.stockholmresilience.org/research/planetary-boundaries/planetary-boundaries/about-the-research/the-nine-planetary-boundaries.html>

<sup>2</sup> <https://www.lajuntatribunedemocrat.com/news/20190218/soil-ecologist-challenges-mainstream-thinking-on-climate-change>

<sup>3</sup> <https://www.plantlife.org.uk/uk/our-work/campaigning-change/nitrogen>

<sup>4</sup> <http://www.fao.org/3/CA3129EN/CA3129EN.pdf>

4. We strongly believe everybody has a role to play in adapting to climate change. What ideas do you have to adapt and contribute to our objectives?

It is particularly important that we continue to communicate the risks and impacts of climate change to encourage individuals, businesses and other organisations to be prepared. We also need to ensure these people and organisations are aware of Wales' adaptation efforts so they are able to access the tools available to support them. Welsh Government has made a number of commitments to improve communication in this area.

5. What else can Welsh Government do to improve communication around the risks and impacts of climate change and the need for adaptation?

6. How can you contribute to communicating the risks and impacts of climate change and the need for adaptation?

Through our actions to adapt to climate change, we want to maximise the wider benefits and minimise adverse effects for the people of Wales, both now and in the future.

7. How do you think the potential actions to adapt to climate change might affect you or the organisation you work for?

8. How do you think the potential actions in this plan might affect the following?

- Public health
- Communities
- The Welsh language
- Equality
- Children's rights

9. How do you think the potential actions to adapt to climate change might contribute to achieving the national well-being goals? You can read descriptions of the goals at <https://futuregenerations.wales/about-us/future-generations-act>

10. Do you have any other comments about this consultation?

