



7/01/2022

COMMENTS TO ACCOMPANY RESPONSE TO CLIMATE CHANGE CONSULTATION

CPRW Brecon & Radnor Branch welcomes Powys Council's intent to use its powers to address the issue of climate change and is pleased to have the opportunity to comment on the draft strategy. We are disappointed though that the Council is operating its consultation through a multiple choice online format, which reduces both the scope for comment and transparency and accountability. Given the limited range of questions available online, and the impossibility of ensuring that our response is not lost in the online process, we have taken the opportunity to expand our comments by way of this letter.

A strategy should be a carefully developed plan for achieving a goal. Unfortunately, this draft document doesn't include either a clearly defined goal, or set out any specific measures which PCC intends to adopt to achieve its (so far unspecified) goal or goals. A set of aspirational statements do not add up to a strategy. The final document will not serve any purpose without clarity as to both the goal and the measures envisaged to achieve it.

The Council needs to identify an achievable and SMART set of goals. These must recognise that measures to reduce climate change risks will fail unless they operate alongside specific measures to reverse ecological damage and the degradation of the natural world.

This document then needs to recognise the mechanisms through which Powys Council can work to advance its climate/environment objectives, and identify ways in which these mechanisms will be employed. In our view key mechanisms available to the Council include:

THE PLANNING SYSTEM, INCLUDING:

- Development management decisions, and the subsequent monitoring and enforcement of conditions etc. Planning decisions have potential climate and biodiversity impacts and these are not adequately recognised or given sufficient weight in planning decisions. CPRW Brecon & Radnor is very concerned about the failure of Development Management (DM) to properly assess impacts of controversial planning decisions e.g. planners are failing to recognise climate, environmental (and social) damage from intensive livestock unit (ILU) development. There is no real recognition of the impacts of increased volumes of heavy traffic on small rural roads, or of 'ghost acres' and deforestation issues associated with feed supplies, long supply chains and their impacts, wider pollution issues falling outside NRW's remit, including real damage to ancient woodlands and local habitat loss. This has to change. Full recognition of climate and environmental impacts of planning decisions is completely essential to the achievement of climate goals.*
- The Powys Local Development Plan (LDP) and the effective monitoring and evaluation of its impacts. Planning decisions are made within the context of LDP policies. CPRW Brecon & Radnor is very disappointed that Powys DM refused to consider inclusion of an LDP policy for ILUs in the current LDP, despite the high volume of applications and clear DM uncertainties about legal requirements for their assessment. Nor were CPRW Brecon & Radnor concerns about the potential effectiveness of monitoring sections of the draft LDP taken on board.*

- *Meaningful engagement with stakeholders: NGOs and local residents. Currently, all but statutory consultees are completely and deliberately excluded from any role in planning decisions. NGOs bring specific expertise and local residents often have specific local knowledge and will be most directly impacted by decisions. However, responses to planning applications are not made (in any realistic way) available to the public, and are not passed on to decision makers. A CPRW FOI request has revealed that planning officers do not forward NGO or other objections to planning applications to the planning committee. Itemising headlines of objections does not convey their seriousness or validity.*

PROVISION OF LOCAL SERVICES, INCLUDING

- *Operation of own estate*
- *Recycling and waste management*
- *Highway maintenance e.g. treatment of road verges*
- *Council use of pesticides and herbicides in land management*

PROCUREMENT

DECISION MAKING POWERS ON ISSUES SUCH AS SCHOOL CLOSURES

COOPERATION WITH OTHER LOCAL/WELSH STATUTORY BODIES E.G. NRW AND STAKEHOLDERS E.G. WILDLIFE TRUSTS AND OTHER NGOS AND LOCAL RESIDENTS

COOPERATION WITH CROSS BORDER STATUTORY BODIES E.G. EA & HEREFORDSHIRE CC RE RIVER WYE NUTRIENT MANAGEMENT PLAN BOARD – POWYS COUNCIL ARE NOTABLE FOR THE ABSENCE OF ANY MEANINGFUL CONTRIBUTION OR ENGAGEMENT IN THE WORK OF THE NMP BOARD.

SPECIFIC RECOMMENDATIONS:

- *The revised draft must be amended to include SMART goals and clearly identified measures by which the Council will seek to promote those goals through all its activities. Otherwise, the Strategy will remain an entirely pointless document.*
- *The revised Strategy needs to include further objectives to 1) reflect 'Mid Wales Energy Strategy' Key Priority 5: 'Help develop and harness the potential of agriculture to contribute to zero carbon goals', and to recognise 2) the need to reverse biodiversity loss and restore ecosystems, and 3) to prioritise energy efficiencies and savings. Objective 2 should acknowledge that renewable energy developments should be confined to appropriate sites and that 'barriers' to development may be entirely legitimate and to be respected rather than 'overcome'.*
- *We have commented in our online response on some of those sections and on specific objectives which we do not feel contribute anything to the meaning of the document. The document would be very much improved by judicious editing.*
- *The Strategy should also recognise the climate/biodiversity impacts of the Council's own planning decisions, in particular in the case of controversial and/or potentially highly polluting developments such as ILUs, RE developments, waste disposal units etc. The requirement to adequately assess and take into account climate and biodiversity impacts of Council activities and decisions should be clearly set out and backed by a commitment to the necessary training of DM officers and others and to the employment of sufficient inhouse expertise to inform its activities and decisions.*
- *Key areas for change: This section is inadequately developed. There is no recognition here of the key role of the planning system. The required new objectives outlined above should be reflected. The Land*

Use section must specify the requirements to 'Help develop and harness the potential of agriculture to contribute to zero carbon goals' and to reverse biodiversity loss and restore ecosystems. Current constraints such as the virtual non-existence of a useful rural public transport service should be acknowledged and addressed.

- *The authors of the document need to explore other ways in which changes can be made to existing ways of working within the Council which would deliver improved climate/biodiversity outcomes. Can the Council reduce use of harmful chemicals in land management? Or reduce verge cutting? Or support environmentally friendly farming through its own procurement practices? There seems to have been little exploration of the potential range of specific actions available to the council and the document contains too much vague aspirational verbiage.*
- *The Council should commit to playing a full and proactive part in local and regional initiatives to protect the environment, perhaps working with local wildlife trusts, exploring sustainable food options, assisting in the setting up of local food hubs, and other climate/environment friendly initiatives. CPRW Brecon & Radnor would welcome a clear commitment on the part of the Council to fully engage with stakeholders and work with them on climate/environment initiatives.*
- *Graphs included within the document should be fully annotated and sourced. It's not clear whether Chart 6.5 illustrates RE development in Powys, Wales or the UK. We can all guess, but we shouldn't have to.*