



Wales Heat Strategy consultation

Cambrian Mountains Society comments on selected consultation questions.

Submitted by Lorna Brazell, secretary@cambrian-mountains.co.uk, for the Cambrian Mountains Society (CMS), a membership organisation and charity (Reg. 1113037) aiming to promote, for the benefit of local communities, and of the wider public, measures which will sustain or enhance the landscape, natural beauty, biodiversity, archaeology, scientific interest, and cultural heritage of the Cambrian Mountains.

These comments are based on our experience of campaigning, education and initiatives around the natural and built environment in and around the Cambrian Mountains but also through engagement with other organisations with similar goals across Wales.

Section 2: A vision for heat in Wales

Q1: Vision

The Heat Strategy Vision is expressed solely as an economic problem. This does not adequately capture the implications of heat within Wales.

First, money alone will not solve this problem. The comments later in the consultation on lack of take up even of financially supported decarbonisations offers implicitly acknowledge this. Households, communities and businesses need both to have accepted responsibility and to feel they have the ability to deal with the issues, in order for any strategy to succeed.

Secondly, human history is rife with examples of solutions devised for one problem creating or compounding other problems. Heating for humans inevitably imposes a cost on the natural environment. The strategy needs to reflect awareness of this, and the balance of costs and benefits heat solutions create. The nature emergency (already declared by Welsh Government) is as great a challenge for the future of human society as the climate emergency. Consequently, the impacts on nature, in particular biodiversity, of the proposed actions to mitigate the use of fossil fuels need to be fully acknowledged and their costs for future generations taken fully into account.

The State of Nature Report 2023 shows that since careful monitoring of 380 Welsh species began in 1994, their numbers have declined on average by 20%, with 18% of our species at risk of extinction within Wales. Key drivers of this ongoing crisis are land use changes. The destruction of relatively undeveloped land for the construction of wind farms and the extensive infrastructure needed to bring them into (and transport power out of) remote and relatively

biodiverse regions such as the Cambrian Mountains has a still larger impact.¹ We understand that Planning Policy Wales (PPW) is being reviewed to provide greater protection to areas of high biodiversity value, such as Sites of Special Scientific Interest (SSSIs); the Heat Strategy must not undermine that through embracing simplistic solutions.

Thirdly, the strategy is supposedly two-pronged: first improve Wales' buildings' energy efficiency for heating, and then heat everything everywhere using heat pumps run with renewable energy. We note however that the vast preponderance of the text relates to heat generation and distribution, and only a relatively small proportion to reducing the demand. Insulation and energy efficiency have already proved to be hard problems to solve, since for non-standard buildings they require custom solutions for each project. But the fact this is hard to do requires *more* attention to be given to it not *less*. The draft's imbalance suggests that the within-reach 'solution' of heat pumps has caused the generation side already to come to dominate action plans. If this imbalance persists, it will ensure that the resulting strategy fails to deliver the decarbonisation required, driving up demand for electricity while much of the energy actually delivered to enable heating continues to be wasted.

Section 3: Our enabling framework

4: Planning (LAEPs)

Local Area Energy Plans will be required to manage the transition to net zero heating at a local level, but to be effective they will need to consider the pathways to achieving this for existing as well as new buildings, domestic or commercial.

CMS frequently engages with the existing planning system, which we find to be far from easy to grasp or influence. The effect is to exclude individuals and communities from having any real say in the development of their neighbourhoods, especially since local planning authorities have taken to relying on data privacy arguments to keep objections secret. While we support the goal of transition to net zero heating, we believe there is a risk that 'streamlining' in practice could act as an excuse for further exclusion of communities. Any proposal on this needs to consider not just the interests of the applicant (in particular, large developers with well-funded professional advisers) but also the communities affected by the proposed development. Community Impact Statements for large infrastructure or other major developments could go some way to assist this, giving short descriptions of how such proposals would affect communities, both positively and negatively, to encourage meaningful public engagement around planning applications. Citizens are unlikely to support decarbonisation measures which affect them without consulting and considering their interests; and such loss of support in one aspect is likely to carry over into reluctance to engage with those aspects – such as household insulation – which require their wholehearted participation.

3. Understanding and engagement

The Strategy understandably focusses on methods for encouraging decarbonisation in densely populated urban areas. These are however the most likely to benefit from relatively modern

¹ Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), 'Summary for Policymakers', Global Assessment Report on Biodiversity and Ecosystems (2019), p.12
<https://doi.org/10.5281/zenodo.3553579>

housing stocks and so lower average energy inefficiency. Heat grids in particular have no real relevance to areas with widely dispersed farms and houses and very small communities.

Accordingly, a separate strand of engagement and skills provision should be targeted specifically at the remoter rural and upland areas which:

- experience some of the harshest climate conditions;
- are dominated by the least energy efficient heritage housing stock; and
- have an older and often lower income population which is less likely to access ‘one size fits all’ information sources, in particular online or social media-focussed communications.

Section 4: Transforming our networks

Q9: Electricity networks

Upgrading Welsh electricity networks for net zero will require clear leadership and plans from Welsh Government and local authorities. Without that leadership, developer- or company-led network enhancement is likely to be inefficient, inadequate, and fail to take account of the many considerations that such an upgrade entails. Many profit-driven proposals such as large wind or solar farms or rural pylons are, despite their rhetoric, in reality reckless as to their negative impacts on biodiversity, landscape or communities. It is an essential role for government to minimise the damage imposed. Individuals and scattered rural and upland communities have limited capacity to assess and respond to a plethora of proposals, and essentially no mechanisms at all for contesting applications where a developer brings legal proceedings. Only a national plan crafted to reflect the critical and irreplaceable importance of biodiversity to society and future generations can coordinate upgrades to energy generation and distribution to enable rollout without unacceptable destruction.

More emphasis should be put on developing the grid to enable it to support truly local (community owned/ operated) solutions, and on access for rural communities to the expertise necessary to assess such possibilities. Current business models for so-called ‘community energy projects’ being advocated by consultancies such as ShareEnergy appear to depend upon grants paid to the community for finding a local commercial consumer for a renewable installation to supply. The community’s involvement is limited to obtaining grants for the feasibility stage and a potential small payback from the reduction in costs of the electricity generated as and when it exceeds the commercial consumer’s needs. This offers neither true community engagement nor ownership, and while fostering cynicism amongst rural communities is unlikely to deliver widespread decarbonisation.

Section 4: Improving the energy performance of our homes

The uptake of low carbon heat and more energy efficient homes will not be achieved by regulation alone. Rules imposed on homeowners without widespread public understanding and tolerance, if not necessarily support, are likely to provoke public reactions like that seen in Germany whose government has had to pull back from its initial proposal to effectively ban domestic gas boilers. In essence, it is necessary to make it realistic and desirable for households to change their established heating by making the work to be done both affordable and possible (lack of skilled workers in all trades is a particular difficulty for remote communities), *before* bringing in regulations requiring them to do it.

Q16: Traditional buildings

Many if not most of the properties in remote upland areas such as the Cambrian Mountains are historic stone built houses wholly unsuited to move to electrically driven heating. Local demonstration projects for historic and traditional building retrofit would help to make it possible for local people to understand how this can be done without excessive disruption or ongoing inconvenience. In contrast, some of the existing UK Government insulation subsidies have led to households finding their room spaces unacceptably shrunk by the addition of thick internal panels and their homes left entirely undecorated – a cost which was not explained to them before they agreed to take up the insulation offer. These experiences, widely shared on social media, are likely to put further households off taking up any such offers for fear of the hidden inconveniences and costs which commercial operators do not disclose. Properly defined subsidies would help to grow the market, insofar as Welsh Government can afford these. Both policy and subsidies need to be long-term as the education stage in itself takes time and stop-start approaches will not encourage investment in retrofitting skills.