



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Clean Growth Strategy

Comments from Natural Resources Wales.

The statutory purpose of Natural Resources Wales (NRW) is set out under the Environment (Wales) Act 2016. In the exercise of its functions under the Environment (Wales) Act 2016, NRW must pursue sustainable management of natural resources in relation to all of its work in Wales, and apply the principles of sustainable management of natural resources in so far as that is consistent with the proper exercise of its functions. NRW's duty (in common with the other public bodies covered by the Well-Being of Future Generation (Wales) Act 2015) is to carry out sustainable development. This means, in general terms, looking after air, land, water, wildlife, plants, and soil to improve Wales' well-being, and provide a better future for everyone. NRW is also an advisor to the Welsh Government on the natural heritage and resources of Wales and its coastal waters.

We thank DBEIS for the opportunity to raise comments on the Clean Growth Strategy.

Our detailed comments are set out below;

Comments from Natural Resources Wales (NRW) on the Clean Growth Strategy

1. NRW welcomes the Clean Growth Strategy which embraces the concept of a low carbon strategy that puts the environment, business and innovation at the heart of clean growth. The strategy offers some compelling drivers, both financial and strategic, to further deliver the low carbon economy which is vital for our future.
2. However, further clarity is needed on how the commitments outlined will be delivered across the UK that complements the aspirations and strategies of the devolved administrations. The wide range of policies and proposals currently set out in the Strategy does not provide sufficient information in terms of territorial extent (if applicable) i.e. If it is for England only or applicable across England and Wales or the UK. It will be important for all the devolved administrations and the UK Government to be clear on the extent of the proposal. For instance, where necessary the development of the Low Carbon Delivery Plan for Wales during 2018/2019 might be able to address any gaps such that It would be useful to have this clarity in early 2018.

3. In addition to the above, there are some issues that are of particular interest to Natural Resources Wales. Specifically;

- We welcome the renewed support for offshore wind, however little has been said about support for onshore wind, which was recognized as the cheapest form of energy generation. The importance of onshore wind was also recognised in the UK Government's independent 'Cost of Energy Review' by Professor Dieter Helm in delivering carbon targets and securing energy supply, yet onshore wind is in a disadvantaged position in competing for contracts. Similar concerns were expressed by Welsh Government in their [recent statement](#) urging the UK government to enable onshore wind and solar technologies to compete in renewable energy generation auction rounds.
- Solar was also recognised as [one the cheapest form of technology](#) (after onshore wind). However, there is a lack of support within the Clean Growth Strategy for [large scale solar deployment](#), other than the options under consideration for small scale low carbon generation and the commitment for reduced VAT rate of 5%, for where an installer installs solar panels with a battery in residential accommodation.
- We strongly support the phase out the use of unabated coal to produce electricity by 2025 as this will result in very significant reductions in Welsh emissions due to the high percentage of emissions. For instance, the 17% of emission arising from Aberthaw power station. As well as yielding GHG emission reductions, Aberthaw is amongst the largest point source nitrogen oxide sources in Europe, such that significant air quality benefits for Wales will be delivered too as a result of this policy.
- Wave and tidal was recognised for its role in the decarbonisation of UK. However more clarity on the UK governments position on tidal range development would be useful. NRW continue to advise on individual tidal range projects in Wales but believes that development of this type and scale should only take place within a policy led framework. That policy might usefully set out, amongst other things, the strategic need and the possible alternatives, and could consider how key gaps in information about environmental effects can be addressed, either through scientific research or through guidance to decision-makers.
- Since the publication of the Clean Growth Strategy, in which it was concluded that potentially up to a further 10 GW of offshore wind might be deliverable, the Crown Estate has announced that it will be considering new leases for offshore wind projects in England and Wales. In recent years, plans for offshore wind have been considered as part of a wider government plan for all offshore energy accompanied by a strategic environmental assessment of the plan. NRW has supported this approach and is a member of the Offshore Energy SEA Steering

Group and we would welcome early clarification whether a further round of offshore energy planning is to take place and the timeline around this.

- Welsh Government recently launched [a consultation](#) on the Wales National Marine Plan (WNMP). The WNMP contains specific policies and narrative relating to low carbon energy development and seek to safeguard resources and support development in key areas (including wave and tidal). This also includes discussion of some of the evidence gaps and those initiatives that aim to fill some off these gaps. Any UK government policy and planning for these sectors should take account of the WNMP, its policies and the information it contains to ensure that the policy and planning framework is as coordinated as possible and is supported by a comprehensive evidence base.
- It is worth noting that since passing of the Wales Act in 2017, some energy related powers will be devolved to Welsh Ministers whilst powers for larger scale energy developments will remain with the UK Secretary of State. It will be important that any energy planning and policy development that UK and Welsh Government undertake are synchronised and that strategic research and evidence gathering take advantage of any synergies as far as possible.

I hope you find our comments useful and constructive. Please contact Kalpana Balakrishnam [kalpana.balakrishnam@cyfoethnaturiolcymru.gov.uk] if you would like to discuss in detail.

Yours Sincerely,

Keith Davies
Planning,Landscape,Energy and Climate Change Manager