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Sent: 15 November 2019 09:54
To: NDF
Cc: [REDACTED]
russell.george@assembly.wales
Subject: NDF Consultation - Llansantffraid & Deytheur CC Responses and Comments
Attachments: NDFCommentsNovemberdraft1 2020.odt

For attention of the NDF Consultation Team

Dear Sirs,

I attach a document setting out our responses and comments on the NDF Consultation Draft by Llansantffraid & Deytheur Community Council on behalf of the communities we represent.

As today November 15th 2019 is the last day for submissions, I would be grateful for an e-mail acknowledgement that the document has been safely received.

I am copying this e-mail to our Clerk Anna Davies for distribution to Councillors. Also I am sending copies of the document for information to our Powys County Councillor Gwynfor Thomas and our AM Russell George.

I look forward to receiving your acknowledgement of receipt.

Cofion,

Digby Davies, Chairman - Llansantffraid & Deytheur Community Council
Home Address: [REDACTED]
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NATIONAL DEVELOPMENT FRAMEWORK (NDF) 2020-2040

Consultation Draft: 7 August – 15 November 2019

Responses and Comments by Llansantffraid & Deytheur Community Council (Cyngor Cymuned Llansanffraid & Deuddwr)

Prepared by Digby Davies, Chairman – Llansantffraid & Deytheur Community Council

Date submitted – Friday 15 November 2019

1.0 Background

1.1 Members of Llansantffraid and Deytheur Community Council are elected by the largest village community in the Montgomeryshire Vyrnwy valley with a population of c. 2,000 which rises to c. 4,000 in the summer tourism months. Tourism and agriculture are the basis of our local economy. Llansantffraid has five privately owned and managed tourism parks along the valley with over 850 holiday homes. While we believe in “green” initiatives, renewable energy generation and conservation schemes at the community level, we are deeply concerned by the Welsh Government ambitions expressed in the NDF for large-scale “renewable energy” (RE) in newly defined “Priority Areas” (PAs) in Mid Wales.

1.2 The community we represent is strongly opposed to more large-scale RE, such as wind farms and their associated infrastructure, in Powys. This is because we believe the cumulative impact of large RE schemes in upland Powys would seriously harm our local economy and environment and cause widespread job losses in our community, especially in the tourism sector. We took part in and made several written submissions supporting our case to the Mid Wales Conjoined Wind Farm Public Inquiry (the CPI) in 2013-2014.

1.3 The main damage would be caused by the controversial “Mid Wales Connection” (MWC) as proposed by National Grid plc (NG). The MWC would be a 42 km super-highway of 400 kV overhead power cables, mostly on giant 50+ metre high pylons, that NG would construct through the heart of rural Montgomeryshire and Shropshire to export the RE electricity from upland Powys to the electricity grid in England. The likely cost of the controversial MWC is over £450 million (2015 estimates) to be met, ultimately, by electricity bill-payers.

1.4 The MWC power transmission line, which NG says would be essential if more large-scale RE projects were built in upland Powys, would export the electricity from a substation (collection point) at Cefn Coch following the tranquil and scenic Vyrnwy valley all the way into Shropshire. Apart from a short 13 km underground section at Meifod, it would use arrays of 400 kV overhead cables supported on 50+ metre high pylons c. 300 metres apart. The line would pass directly next to Llansantffraid crossing the Vyrnwy 12 times in 3 miles, ruining the river landscape and damaging local businesses, property values and environment along with the settings of our built heritage of over 50 Cadw Grade 1 and 2 listed buildings and a Scheduled Ancient Monument (Plas yn Dinas). Beyond Llansantffraid, after threading their way between the tourism parks, the pylons and 400 kV power line would cross the Montgomery Canal and the Offa's Dyke Path and National Trail. All these tourist attractions and assets would be severely blighted.

1.5 For the last 5 years since the CPI concluded, the large wind farms and the controversial MWC have been "suspended". Our communities have begun to recover from the threats of damage, landscape blight and job losses. It would be really hard for us to re-engage in these battles with developers and planners but if the NDF, as it stands, were put into effect, we would have no alternative. In 2012 we carried out an externally monitored and validated 1,000 household survey of Llansantffraid electors to gain an objective view of people's opinions. Over 55% of electors took part. 82% opposed the industrial-scale wind farm developments in Powys and 100% opposed the power line and pylons. Other local Community Councils such as Carreghofa and Meifod that would be affected by the controversial MWC carried out similar surveys with similar results. Local opinion, we know, remains the same today. Our role as a Community Council is to represent our residents and we will continue to do that.

2.0 Responses and Comments

In producing these responses, councillors have studied the draft NDF documents provided and have consulted widely with residents in our community of Llansantffraid & Deytheur. We have met also and corresponded with many people in neighbouring communities such as Meifod and Llandrinio and with organizations such as MAP and CPRW, both of which our council supports. We have been in close touch with people over the border in Shropshire, as well, who would be seriously affected by these Welsh Government draft NDF proposals. We attended one of the NDF "drop-in" sessions (Newtown) and individual councillors attended others.

2.1 We fully agree with and support the 7 November written urgent interim submission by CPRW (The Campaign for the Protection of Rural Wales) that the RE part of the NDF should now be set to one side and postponed for subsequent re-drafting.

CPRW is correct in saying the RE sections are full of errors, they do not take accounts of the facts (such as that Wales is already a net exporter of electricity) and are in any case incomplete since they ignore off-shore wind (the likely future electricity generation mainstay) and the key issues of transmission lines and other electricity infrastructure locations. In addition, the draft NDF fails totally to assess the impacts of the proposed PAs on the areas where they have been located, seemingly at random!

2.2 Consultation and involvement of stakeholders (such as us) in preparing this draft has clearly been inadequate. For our part, we have had no sight of earlier drafts and the present draft NDF document is silent on the methodology by which it has been produced.

The “drop-in” consultation sessions organized by the NDF team were inadequate in that they were too short, had to be booked in advance and were unsuitable for working people, those with parental responsibilities and the elderly. We asked the NDF team if we could arrange a group briefing session for Llansantffraid people but we were refused.

2.3 The NDF proposal of three planning regions for Wales based on Cardiff, Swansea and Wrexham is unacceptable. A “spatial strategy” for Mid and South West Wales (See map on draft NDF page 25) which lumps Tenby and Welshpool together and suggests that Swansea can be in any sense a “regional centre” or “focal point” for planners in Montgomeryshire is seriously deluded.

Here in Llansantffraid we are closer in distance to Lancaster or Nottingham than to Swansea and much closer to both in travelling time. Nobody with whom we discussed the “three regions” proposal could see any merit in it. Our recommendation is that Mid Wales or Powys should immediately be re-defined as a fourth Welsh planning region as previously.

2.4 Page 36 of the draft NDF in dealing with Renewable Energy says that “communities will be protected from significant cumulative impacts to avoid unacceptable situations...” Yet the draft NDF nowhere deals with impacts of downstream RE infrastructure such as substations, pylons, transmission lines etc.

So does the NDF team see the landscape and economic damage to Llansantffraid that would be caused by the cumulative impacts of large-scale RE development in Powys as acceptable? During the several years our community was under threat by National Grid plc and the controversial Mid Wales Connection we suffered real economic disadvantage. Now we see the return of that threat in the draft NDF, especially in such statements as “bringing a critical mass of new renewables developments together to build the case for new or reinforced grid infrastructure.” (See draft NDF page 36). The cost of the MWC, if built now, would almost certainly exceed £500 million – a heavy price to pay for exporting surplus RE electricity and causing unemployment along the route of the pylons. Where for Llansantffraid is the “direct social and economic benefit to local communities across the country?” (See draft NDF page 41). We see only blight, landscape destruction and job losses, especially for our tourism businesses and the people who depend on them.

2.5 The NDF team were not able to confirm what, if anything has been agreed by the Welsh Government with Shropshire County Council and neighbouring areas of England where the MWC would have similar negative impacts to those in North Powys.

Large-scale on-shore wind development has now stopped in England due to public resistance. It is unlikely, we believe, that Shropshire residents will take happily to

downstream RE electricity infrastructure such as miles of 400 kV power lines on 50+ metre high pylons destroying their landscape and overshadowing their houses. The NDF says that decisions on major RE schemes will be taken by Welsh ministers in Cardiff “with a **presumption in favour** of large-scale on-shore wind and solar energy development.” (!) Scarcely democratic for the people of Powys or neighbourly for Shropshire people on the controversial MWC route! It is not hard to see that endless legal and political arguments would very likely ensue.

2.6 Apart from a brief mention on page 14, the draft NDF takes almost no account of key economic factors such as tourism. Yet the Welsh Government’s own (Regeneris Consulting Ltd) 2014 Study has very relevant sections which should have been mentioned and considered, even in a primarily spatial planning exercise. The tourism business, vital to our local economy, is highly sensitive to landscape change and for the draft NDF to talk of “acceptance of landscape change” (by Welsh Government Ministers in Cardiff) is arrogant.

The Welsh Government commissioned a report titled “Study into the Potential Economic Impact of Wind Farms and Associated Grid Infrastructure on the Welsh Tourism Sector” which was published in February 2014. It confirms (what we already knew) that visitors’ opinions of “associated infrastructure” (substations, power lines, pylons etc.) are consistently “far more negative than toward wind turbines. This strong feeling towards grid infrastructure presents an increased risk for those areas where new pylons are proposed alongside considerable wind farm development, particularly North Powys”. (See Regeneris Study page 3). We know that 70% of visitors cite our landscape as the main attraction in Mid Wales. The Welsh economy benefitted by £6.3 billion from tourist visitors in 2018 (See draft NDF page 14). How then can the draft NDF blithely promote “an acceptance of landscape change” when this is the case? And why does the draft NDF (See page 37) talk only of “an acceptance of landscape change in those areas” (the “Priority Areas”) while the actual landscape change and damaging impacts would extend, in the controversial MWC case, for over 30 miles from the proposed large-scale Powys wind farms through our Llansantffraid community area and even over the English border!

A few more comments in conclusion -

2.7 We object strongly to the top-down, centralized planning model which this draft NDF exhibits

Community Councils like ours should be the productive grassroots of planning and development in Wales. But as the Welsh Government centralises more and more planning decisions we are now becoming almost totally irrelevant, as indeed are the Powys County Council planners at the next level up who are responsible for our Local Development Plans. Now that the Welsh Government has decreed that all RE projects over 10MW are “Developments of National Significance”, power has been taken away from the people of Wales and reserved for a small group of Welsh Ministers. The result, we fear, will be a disregard for local feelings and a series of damaging, poor-quality planning decisions.

In Powys, we have already experienced this in the case of the long-running disputes over Hendy Wind Farm in Brecon & Radnor where the Welsh Minister concerned has

taken a series of arbitrary and ill-founded decisions in favour of developers and against the interest of local people.

Another example can be found in the draft NDF document itself. (See NDF page 68). It is obvious that Policy 32 on expanding Cardiff Airport is incompatible with much of the content of the draft NDF. Anyone can see that expanding the capacity of that airport, which is failing to compete well with others such as Bristol across the English border, is directly at odds with the statement by the Welsh Government that “we are committed to decarbonising Wales”. Except, of course, in Cardiff Airport!

2.8 The draft NDF is silent on community energy schemes.

We searched the NDF documents, without success for information on Welsh Government macro-policy relating to community energy schemes. As a Community Council we feel a need to promote and assist members of our community to engage with “green” issues and to help cut the ever-increasing costs of energy as supplied by the large public companies that dominate the market. The first public electricity supply in Llansantffraid over a hundred years ago was a hydropower generator linked by a local builder to a small distribution network. We can see that such schemes may well become relevant again with the challenge of combatting climate change. We note on page 36 of the draft NDF that the Welsh Government has a target “For one gigawatt of renewable energy capacity to be locally owned by 2030”. The NDF should try to simplify such targets into something which is meaningful. Is that the equivalent of fifty solar panels in a community like Llansantffraid? Or what? We did ask what this target meant in an NDF drop-in session but no answer was forthcoming!

2.9 The draft NDF (See page 41) is misleading on “environmental benefits” from RE projects

We were disappointed to learn that these “benefits” were simply the repair of damage caused by construction and operation of wind farms etc. Repairing environmental damage and reinstating land is not really a “benefit” but it is at least good news that the Welsh Government sees it as their responsibility!

2.10 The draft NDF document is expensively produced (landscape format, many full-page colour photographs without titles, lots of (rather hard-to-read) graphics and schematic maps and diagrams.

We feel – as did all the local residents who saw it – that money could have been better spent on a proper community level and fully bilingual consultation campaign across both urban and rural Wales. And a normal **Contents Page** with page numbers (bottom or top of page better than on side edges) would have been more useful than two vacuous Ministerial Forewords (two full pages) and an account (we found rather tedious to read) of “Document Structure”. Something to think of for next time!