

From: Jonathan Wilkinson [REDACTED]  
Sent: 14 November 2019 18:23  
To: NDF  
Cc: [REDACTED]  
Subject: MAP submission to NDF consultation  
Attachments: MAP NDF document with comments 14 Nov 2019.docx

Please find attached the submission from MAP (Montgomeryshire Against Pylons) to the NDF consultation.

Sincerely yours

Jonathan Wilkinson

Chairman MAP

MAP has now had the opportunity to study in detail the Welsh government's proposed National Development Framework (NDF) for Wales 2020-2040 and our observations are as follows.

From the outset we would observe that it is not apparent whether the NDF is intended to replace the hugely controversial TAN-8 advisory note or its recommendations more than a decade ago for overwhelming numbers of wind turbines and solar generation across Wales, or indeed to supplement TAN-8 with its own even larger area. There is no mention of TAN-8 in the document – a remarkable oversight. We would also note the following:

1) The NDF as a whole is couched in vague and often meaningless jargon and buzz words which on rereading say virtually nothing beyond reiterating the obvious. Thus, it considers 'spatial strategy' as key to the plan, but its section on this is bland to the point of being meaningless. Thus 'We want places to be healthy, prosperous, vibrant and cohesive and to support wellbeing'. The 'spatial strategy' 'map' (p25) is completely vacuous, simplifying such items as transport connections as they currently are, proposing no innovations beyond defining existing national growth areas, which are entirely concentrated in the existing urban centres of Cardiff and Swansea and to a lesser extent Wrexham and Deeside. There is no change there beyond a commitment to very small regional growth areas.

The NDF boasts of 'securing large-scale growth in the urban areas, development areas can be channelled away from the countryside and productive agricultural land can be protected'. There is barely any further reference to agriculture, and none to tourism other than its paragraph on p14: 'Our visitors: we attract visitors from all over the world with 10% of our overnight visitors coming from outside the UK. There were 96m tourist's day visits in 2018, 10m overnight stays and around £6.3 billion generated from tourism in the Welsh economy'. These are the mainstays of the rural economy in Wales which, as the document admits, contains 40% of the Welsh population.

In fact, insofar as the NDF contains any specific proposals of any interest at all, it is a blueprint for the existing main centres of urban development in Wales (which unsurprisingly is where the

current Welsh government gets its support from electorally) ignoring the rest of the country. The plan adds revealingly that 'its proposals for new public services facilities of a significant scale should be located in town and city centres. A sequential approach must be used to assess development plan allocations and to determine planning applications for developments. Only in exceptional circumstances should public service facilities of a significant scale be approved outside of town and city centres' (p27). Thus, are the rural communities of Wales to be abandoned!

By contrast the section devoted to rural communities largely consists of bromides such as 'The Welsh government supports sustainable rural communities and appropriate proportionate growth in rural towns and villages. The future for rural areas are best planned at the regional and local level. Strategic and Local Development Plans should plan positively to meet the needs of rural communities with regard to housing, transport, business, services and diversification in the agricultural sector' (p29).

We consider that the NDF should consider in detail the diversification of agricultural businesses and the drive to food production for a growing population which will encourage the use of local produce as opposed to importing foodstuffs which will, in turn, cut down on the carbon footprint. In addition, there should be a strong focus on encouragement of local businesses which drives local investment and jobs. We consider that all this is lacking in the NDF.

2) The NDF's main concern is to establish a structure of three 'regions' across the country. Fully 20 pages are devoted to the regions, or more than a third of the NDF. The three regions consist of South West Wales, South East Wales and North Wales. The traditional divisions of Wales were, of course, North, Mid and South in terms of history, geography (mountains and rivers running east-west), communications, settlement, local government etc. These regions would apparently have over-riding dictatorial powers over County Councils in terms of planning, development, funding etc., reducing the latter to the status of Parish Councils. Who has ever voted for this? This is a naked power-grab by the Cardiff Assembly Government over the elected democratic Councils of the rest of

Wales.

It is immediately apparent that the regions each have a dominant urban centre – Cardiff and Newport in the South East, Swansea in the South West, and the Wrexham, Rhyl and Colwyn Bay nexus of the east and northern coasts.

The South West region contains over 1.5m people, some 51% of Wales's economic output, so it is unsurprising that the bulk of the NDF's efforts should be devoted to this, and in particular the South Wales Metro Scheme, Cardiff Airport, and the Valleys Regional Park. The expansion of Cardiff airport does little to offset a carbon footprint – quite the reverse. Why should the rest of rural Wales pay for this extended carbon footprint by having so called carbon saving windfarms? Astonishingly there is no commitment to an M4 relief road (in spite of the abolition of tolls on the Severn Bridge) and nowhere in the current NDF is there any specific commitment to improving the country's many inadequate transport links.

The North Wales Region contains some 700,000 people and is very diverse in its urban-rural mix. The emphasis of the NDF is entirely biased towards the traditional Labour strongholds, Wrexham and Deeside. The areas around Prestatyn, Rhyl, Colwyn bay, Llandudno, Bangor, Caernarfon and South Gwynedd, as well as most of Denbighshire are virtually ignored in this strategy.

The elephant in the room, though, is the so called mid-and south-west Wales region. As the NDF's own map (p57) shows there are no major links south of Llandrindod Wales to Swansea or Carmarthen in the west, which crosses rugged mountain ranges and rivers. In a straw poll carried out by MAP, 90% of people in the Vyrnwy valley said they had never been to Swansea, the 'capital' of the new region. More than half of the proposed region's 900,000 inhabitants live in the Swansea-Neath-Port Talbot nexus, little more than a small corner of the land area. The NDF's 'focus of growth' is, unsurprisingly, the Labour strongholds of Swansea bay and Llanelli, with a few 'secondary' towns such as Milford Haven, Carmarthen, Newtown, Aberystwyth and the small county town of Llandrindod Wells (smaller, for example, than Welshpool).

A glance at the map of Wales makes it perfectly clear that the natural connection and therefore 'region' for the Swansea area is the Cardiff area (the proposed South East Wales Region), making it an urban region with common problems of around 2m people, and that there is virtually no connection between the Swansea coastal urban belt and the huge expanse of mid-Wales to the north beyond annual bird migrations.

It is clear that Swansea has been arbitrarily appended to mid-Wales in order to create of this enormous rural area an urban loading, with urban priorities sucking the lifeblood out of rural areas, so leaving the latter a Cinderella in a quasi-apartheid system. The purpose of this appalling gerrymandering of mid-Wales (whose natural connections are east west into large parts of Gwynedd and in England, Shropshire and Hereford) is glaringly apparent.

3. In the virtual desert of new ideas suggested in the NDF, beyond ritual incantations and a blizzard of buzzwords like 'holistic', 'sustainable', 'strategic' and 'spatial' one theme is repeatedly returned to in the document: that of climate change, 'decarbonising society', and in particular large-scale wind and solar energy development across Wales. An entire section comprising six pages is devoted to this on top of another four pages devoted to reducing carbon emissions, biodiversity, ecosystem reliance (more buzzwords) green infrastructure and the concept of a Welsh 'national forest' – itself bizarre except in terms of centralisation as through the millennia Wales has had such massively diverse forests from north to south.

Hardly a single page of the NDF is free of a reference to decarbonising or climate change, so it becomes apparent how great is the Welsh government's commitment to this idea, in particular, in this largely ideas-free document. It must be assumed that the real purpose of the NDF is, in fact to legitimise a wholesale return to onshore wind turbines and solar energy in mid- and non-coastal North Wales.

The reality is that the areas of rural mid Wales contain some of the largest carbon absorbers in the United Kingdom in terms of forestry and peat layers (scheduled by this document for

destruction and wind farm concreting) which have not been utilised. These, in themselves, have a value not only to enhance the natural environment and encourage tourism but as valuable carbon sinks that have a financial value when offsetting the carbon footprint of other industrialised entities.

The map on page 42 shows the sheer scale of the Welsh government's ambition to industrialise and destroy vast swathes of Welsh countryside including, astonishingly, large parts of the recreational green belts of Cardiff, the Valleys and Swansea, with giant wind turbines. What do the increasingly prosperous people of the valleys think of this? Have they been consulted? The 14 'priority areas' for solar and wind energy are so vaguely defined in such a loosely drawn outline map of what look like inkblots that one can only guess that it is proposed that an extensive swathe of Wales, perhaps a fifth, including vast areas of Powys and Carmarthen, among the loveliest scenery in the world, which sustains a vibrant tourist industry due to its remoteness and natural beauty, be covered. It should not be forgotten that much of it was originally scheduled to be Britain's first national park, a proposal only mistakenly dropped because of short-sighted local opposition.

The NDF spells out that (p-38) 'The Welsh government supports large-scale onshore wind and solar energy development in the identified priority areas for solar and wind energy. There is a presumption in favour of development for these schemes and an associated acceptance of landscape change. When determining planning applications for large-scale on-shore wind and solar energy development in priority areas, significant weight will be given to the proposal's contribution to reducing Wales's greenhouse gas emissions and meeting our decarbonisation and renewable energy targets'. This is clearly an attempt to write the discredited Tan-8 target areas into local planning statute and probably to expand them. This shows an astonishing and perhaps even not disinterested obsession of the Welsh government with onshore wind, given the history of Tan-8 and the windfarm industry over the past decade.

Of major concern is the presumption in favour of granting permission. This destroys local democracy where the local authority has the say in relation to planning proposals. To change this to

a presumption in favour will create a democratic deficit locally which sets a dangerous precedent. This should be avoided at all costs. Planning consents in these projects are emotive and the local voice MUST be heard on a level playing field. This is directly contrary to the new planning rules in neighbouring England which stress the essential nature of local control. It is virulently anti-democratic and anti-devolutionary. In criminal law there is a presumption in favour of innocence. The proposed presumption in favour of development is a presumption in favour of the prosecution and of guilt – the innocent party being the glorious Welsh countryside.

Specifically, since a sudden expansion of onshore wind in mid-Wales was proposed in 2000, along with the giant National Grid mid-Wales pylon connection, the following has happened to almost entirely destroy the case for onshore wind in Wales:

- \* New onshore wind farms have been strictly limited in England.
- \* Subsidies have been progressively reduced for onshore wind. The steep rise in utility costs has driven many on lower incomes into fuel poverty.
- \* New major windfarm applications have declined to a trickle in mid-Wales, and renewable energy companies are concentrating on offshore wind development, which is considerably cheaper and more reliable, possible tidal projects, micro-turbines, for example hydro, and insulation, all of them with much less environmental impact.
- \* It is now established that onshore wind developers have routinely overestimated their output with average capacity (load in the jargon) of around 20-25% of that possible through continuous wind generation being achieved.
- \* The need to have backup for any wind generation when 'the wind does not blow' – eg gas turbines – means that carbon savings from onshore wind are negligible.
- \* The NDF makes reference (p-38) to 'adverse low social economic and environmental benefits, including cumulative impacts, proximity to the National Parks and Areas of Outstanding Natural Beauty'. As one or more of these impacts is likely to occur with any large-scale wind turbine

installation in Wales, it is hard to see how new ones can be justified.

\* The Welsh government speaks of its wind energy 'targets'. Yet these are already over-fulfilled compared to other parts of the UK. Most of the surplus is exported to England and elsewhere, resulting in the destruction of Welsh countryside for the convenience of English consumers, much as Welsh valleys were flooded for English consumption before the process was brought to a halt by protesters and public opinion.

\* The most startling of the NDF's inadequacies is that there is no reference at all to the infrastructure of large wooden poles and the giant pylons that must necessarily accompany windfarm development on the scale proposed, exemplified of course by the National Grid's aborted mid-Wales connection which threatened to destroy some of the most beautiful and inhabited valleys in Wales, those of the Severn and the Vyrnwy, as well as English countryside in Shropshire, over which the Welsh Assembly Government has no jurisdiction.

The mid-Wales project led to the biggest demonstrations in the history of mid-Wales, attended by over 4,000 people, and the largest in the Welsh assembly's own very short history. As proposed by the Welsh government, when it is not self-contradictory (e.g. in making allowance for cumulative impact), the NDF's proposal for 'priority windfarm development' suggests that the Welsh government has learnt nothing from the many years of public, local authority and press resistance to onshore windfarms and pylons which has changed policy in other parts of government (e.g. that of the UK at Westminster). Energy is a primary requirement and fundamental to our society. It needs to be cheap, available and increasingly based on renewables. 'A really important feature of this document is the regional policies. Across the Government we are committed to enabling bespoke approaches that suit the different parts of Wales to be developed'- NDF 2019. The NDF approach of spatial policy to renewable energy is national, ineffective, short-sighted and ultimately will be very expensive for the bill payer. This will alienate the people of Wales against renewable deployment.

Wales could take a holistic approach to energy production in Wales, encompassing both onshore,

offshore and marine assets. The NDF shows a hotchpotch of areas designated for solar and wind power. No regard has been taken of existing onshore assets in terms of existing grid lines - P42 NDF. Installation of new lines will be costly to the bill payer, delay deployment and has the potential to destroy vibrant existing industries such as tourism. Taking a holistic approach would enable efficient and effective use of existing assets, assessing what will be required in the future and how best to achieve this.

In conclusion, the NDF is jargon-ridden, devoid of real content, proposes a completely impractical and unworkable regional structure for Wales entirely skewed towards the needs of the nearby urban parts of Wales (around 55% of the population and around a twentieth of its land area) and in its single major recommendation is contradictory, completely out of date and shares no awareness of developments within the renewable industry and public opinion over the past decade. It is as if the Welsh government were simply discovering and proposing the same discredited and outdated onshore wind and other policies of a decade ago for the first time.

It is of grave concern that the Welsh government consider that this shoddy, inadequate and largely meaningless document purports to be 'the 20-year plan for shaping the future growth and development of our country ... It sets a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, decarbonisation, developing resilient ecosystems and improving the health and wellbeing of our communities'. (p-4)

It does nothing of the kind, being devoid of substantial content and, in its sole two recommendations poses a regional framework which could destroy the scenic heartland of Wales, and the proposed rape of rural Wales through onshore windfarms. It takes no account of the decade-long debate and development of the industry. The Welsh government should be ashamed to attach its name to such a document, and should require Arup, the consultants involved to repay their fees to the Welsh taxpayer.

