

From: [Bret Kibble](#)
To: [NDE](#)
Subject: Draft NDF consultation
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Importance: High

Please find attached a response from CPRW Montgomeryshire to the consultation.

Kind regards

Brett Kibble (Chair)

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Organisation (if applicable)	Ymgynrch Diogelu Cymru Wledig Cangen Sir Trefaldwyn / Campaign for the Protection of Rural Wales Montgomeryshire Branch

CPRW Montgomeryshire Branch fully endorses the response made to the draft National Development Framework consultation (dNDF) by national CPRW. Given the level of concern regarding many aspects of the NDF and particular concerns in Montgomeryshire we have provided additional comments for your consideration on behalf of our Branch members.

Policy 7 (Neither agree nor disagree but would wish to comment)

Nothing will encourage a widespread charging infrastructure until electric vehicles (EVs) become cheaper, have a wider range (particularly for the more basic affordable models and drivers living in rural areas – there is life outside of towns and cities), and lithium battery costs become less of a liability to the owner and, indeed, the environment. Education is needed on how driving habits would need to change for those with EVs, charging etiquette etc.

At the moment the charging infrastructure is in the hands of the private sector, in some cases in public venues and buildings, others being in petrol stations and shopping centres. It has been claimed that there currently are as many charging points as petrol stations but this is misleading since petrol stations have multiple pumps which means that in real terms there are probably at least ten times more pumps than charging points. We ignore home charging here since no-one would buy an EV without installing home charging, probably at their own cost. However there would be significant problems for those without off-street parking.

Therefore, in the real world, filling your petrol or diesel vehicle is easier and quicker. Furthermore, even rapid charging takes over 30 minutes and degrades batteries quicker than home “trickle” charging, not very competitive with the few minutes required to fill a fuel tank. We recognise that **when** battery technology improves recharging times will reduce.

Since range anxiety is a major factor in persuading drivers to change from petrol/ diesel, in other words a full charge at home will not always last for a long journey, the charging infrastructure must grow quicker than the uptake of electric cars. On a positive point, charging costs are probably cheaper than petrol/ diesel now, but when tax take from reduced petrol/ diesel sales eventually declines measures will need to be put in place to recover this revenue from electric charging. Dearer charging will impact rural communities hardest.

Many smaller towns in Montgomeryshire are exploring the possibility of charging points in their car parks but have had to abandon plans due to lack of an electricity supply within a feasible distance. In other

locations the only supply is at street lighting which would provide insufficient power for the quick charging required at such points and could reduce scarce parking spaces. We are concerned that rural solutions and needs have, once again, been imperfectly considered.

Alternatively, we could have cars with a hydrogen fuel cell which creates its own electricity. The waste product here is a small amount of clean water. Refuelling a hydrogen cell takes about the same as filling the tank in a petrol or diesel car. The snag is that the hydrogen refuelling infrastructure in the UK is tiny (though growing) but could, **perhaps should**, be seen as a low emission additional alternative to the battery car.

It must be stressed that batteries using lithium have their own problems in that lithium mining is very, very destructive for the environment as is dealing with these batteries when they are worn out. Not really green is it.

Policies 10 and 11 (Strongly disagree)

Wind and Solar Energy in and outside Priority Areas

CPRW Montgomeryshire fully endorse the detailed response that has been submitted by national CPRW and would like to add the following points informed by an area that has seen the extremely difficult and divisive implementation of a similar strategy in the form of Tan 8 Strategic Search Areas.

We are very surprised indeed to find that such a detailed and extensive land -use plan for renewable energy installation has emerged at this final consultation stage of the NDF given there has been no previous indication of the determination of such a plan. Perversely, it is now plain to see from the ARUP documents that there has been a long development phase. We would remind the Welsh Government that, according to their own regulations, meaningful consultation must take place at the formative stage of the development of a plan and when there are options to consider. We are incredulous that a Government should consider implementing what must be one of the largest land use planning objectives ever seen without even following its own consultation requirements. Such disregard sits uncomfortably with the fine words in such documents as the Well Being of Future Generations Act and can only lead to feelings of complete disempowerment at a local democratic level.

Embarking on such a plan for energy generation it is axiomatic, as in any proper strategic plan, that all options are first considered before deciding upon a particular path to pursue. There appears to have been no consideration whatsoever as to the options available for achieving the target of 70% of electricity generation by renewables. As an example, the at least five fold effectiveness of a wind turbine offshore compared to onshore when taking into account the sizes and load factors involved. No responsible Government would commit approximately 20% of its landmass to a plan without having even undertaken such a fundamental review of the primary options available.

If the above requirements had been followed and onshore wind and solar had been identified as the only options to be pursued, the proper course of action would then have surely been to identify the scale of requirements of each technology required to satisfy the target. It says on page 3 of the Arup stage 2 report that Arup were commissioned to identify 'The contribution that Priority Areas can make towards Wales renewable energy targets'. At no stage in either of their reports does there appear to be any such analysis and it appears that the Priority Areas have been devised without any prior consideration as to what total area may be required. This is akin to a Government allocating land to housing without even knowing what size of area would be required to satisfy its need.

PAs have been defined using Fixed and Variable constraints but it is obvious from the 2nd stage Arup report that the definition process is oblique to say the least. Two constraints that in practice were found to be of major significance in Mid Wales with respect to the SSAs were those of Vehicular Access and Grid Availability. Many years and funds were spent researching both aspects and both have been of considerable concern to the local communities. It borders on negligence to accept Arup's decision that: 1) Priority Areas for Wind and Solar Energy should not be refined based on grid availability, and 2) We do not recommend refining Priority Areas for Refinement based on vehicular access.

Discussing constraints (Stage 2 report) Arup tend to imply that many are going to be adhered to in

the drawing up of the Priority Areas. We are led to believe;

- SAC's and SPA's are going to be avoided;
- areas that generate visibility greater than in 26% of a National Park or AONB are to be avoided, and
- settlements are not to be encircled.

However we learn later on in the report that such items have actually not been consistently considered and the discussion on particular Priority Areas leaves one fearful of what is still included in each of them. For example in chapter 7 we learn that 'Priority Areas have been refined to exclude SAC's and SPA's wherever possible'. A Government that is a guardian of the highest level of wildlife reserve must do better than 'wherever possible' or be guilty of wilful neglect. In other sections of the NDF it is said that Wales is going to reverse species loss. That is an extremely ambitious challenge and we will need much of the PAs to provide green networks to achieve that end. In chapter 7 it states that 'All areas are suitable for multi benefits from woodland planting and grass heathland creation'. Most people would be very pleased to see that enacted and it would have a very positive effect for Future Generations. Wind and Solar are not compatible with woodland and grass heathland respectively.

Another example is found on page 49 where it says that 'Areas with more than 50% visibility from the Brecon Beacons National Park have been removed from this Priority Area'. But we were led to believe that 26% was about the limit. How does a PA end up with over 50% and even then is only refined to bring the figure down to less than 50% not the 26% ?

Again it is said that efforts have been made not to encircle communities. Of course no effort has been made at all to ameliorate the effects for a huge number of small settlements across the entire PAs and the inhabitants of such towns as Llandrindod Wells, Rhayader and Llanfair Caereinion for example are going to feel nothing other than hemmed in by the technology.

Not only do the above issues lead us to be extremely fearful that the processes involved have not been carried out in the necessary robust and rigorous manner compatible with such a huge land use planning objective, but the incompatibility, especially in Mid Wales, with the outcomes of the very similar process for Tan 8 SSAs leads us to be extremely concerned that Arup may not have the requisite skills to undertake such work if repeatability is not obtained. The constraints are not exactly the same but they do not differ sufficiently for there to be complete removal of two of the three SSAs and a poor match of the third. We were led to believe by Tan 8 that in exchange for accepting landscape change in the SSAs the majority of the rest of the country would be unaffected. It now appears the SSAs are not really the suitable locations and we have to accept landscape loss in all the areas outside the SSAs. How can communities be engaged with policy when there are such contradictions.

We then find that Policy 11 allows renewable development outside the Priority Areas with almost exactly the same criteria as policy 10 within the Priority Areas and only a couple of words difference in the two Policies. As the PAs have not been constrained by technical considerations such as wind speed and land topography (Arup report stage 2) it is obvious that developers will not want to be constrained by PAs so we must seriously question the purpose of a PA Policy.

We have grave concerns that the Arup report is not rigorous enough and this is confirmed by Arup's extremely worrying conclusion that Priority Area 5 has significant generation headroom (Page 38 para 5.2). CPRW Montgomeryshire was heavily involved for two years in the Mid Wales Conjoined Public Inquiry where the issue of grid capacity in that area was rigorously examined. It

was clear there is no worthwhile capacity in that area without implementing grid arrangements across to England. This area cannot be considered as of the highest priority to develop given Arup's obviously flawed grid capacity predictions.

Taking account of all the above issues we believe that the Welsh Government cannot be confident that there has been a competent enough process to implement such a uniquely large land use planning strategy.

In Appendix 1 of the Arup Stage 2 report representatives from NRW emphasised the distress that the cumulative effect of multiple renewable developments within a given area can have. This provoked a discussion of what is and is not acceptable for development in the face of a climate emergency. Workshop attendees concluded that this needs to be a very public conversation evaluating the benefits of increased renewable development against potential landscape impacts. It is incredible that no cognisance has been taken of this at all and appears to only have been translated into the NDF as 'There is, therefore, an acceptance of landscape change in these areas.'

The Government must therefore ensure the recommended debate takes place by removing the policies 10 and 11 of the NDF, carrying out a proper rigorous process followed by a proper public consultation in order to engage with, rather than alienate the public as the present process has done.

HABITATS ASSESSMENT REPORT

It's not easy to say much about this assessment as it appears to have been carried out in accordance with the relevant EU directive, i.e., for each of the defined Priority Area (PAs) it has assessed the possible significant effects on Natura 2000/Ramsar sites of developing wind and solar installations.

It is reassuring to note that it has been possible to avoid most of the larger Natura 2000/Ramsar sites when selecting the PAs. Nevertheless, due to the very large and widespread nature of the PAs (almost 20% of the land area of Wales), it has been impossible to avoid all Natura 2000/Ramsar sites and their buffer zones, which is a cause for concern. It is therefore to be hoped that every effort will be made to avoid damage to these Natura 2000/Ramsar sites and their buffer zones if they are affected by development proposals. It appears that consideration of the detail of developments affecting Natura 2000/Ramsar sites will be at the lower-tier planning level, in particular the Local Development Plan. If this is so, we hope that every effort will be made to take fully into account the views of local communities and organisations.

Whilst Natura 2000/Ramsar sites form the main concern of the Habitats Assessment, we would point out that the PAs affect other important designations relating to nature conservation. By our reckoning, 191 Sites of Special Scientific Interest, 7 National Nature Reserves and 12 Local Nature Reserves are totally or partly within PAs. There is therefore scope for these legally protected sites to be damaged, which is another cause for concern. These sites are very best examples remaining of various wildlife habitats and we cannot afford to suffer losses. In many cases these sites are also integral components of the landscape within PAs, an asset that the NDF is prepared to see degraded within PAs.

To conclude, we are concerned that the sheer scale of envisaged development presents real threats to designated sites throughout Wales, with the potential to negate many decades of progress in protecting our natural heritage.

Policies 23 – 26 (Strongly disagree)

South West and Mid Wales Region

CPRW Montgomeryshire consider the South West and Mid Wales Region concept deeply flawed given the lack of the shared and distinctive characteristics that are a primary requisite of such a grouping and the area is far too large and dispersed.

In particular:

- there are no infrastructure links between Montgomeryshire and Swansea / Llanelli and this is not a desire line as there are no economic, commuting or cultural links;
- the area characteristics on employment and the economy, as well as indicators on health, housing, skills or deprivation differ markedly from the City Region as indicated in the 2019 statistics for Welsh Economic Regions
- local industry exports and imports predominantly from the east and transport infrastructure facilitates this east – west axis. Even our thriving tourism industry is significantly based on the large conurbations east of the English Border.

CPRW Montgomeryshire has serious and multiple concerns regarding the imposition of a Strategic Development Plan from a populous, urban and economically disadvantaged area. The pressing needs of such an area will evidently override those of rural Mid Wales and an SDP, unlike an LDP, will fail to properly assess and meet its different, specific requirements. For example, the delivery of services is inevitably more expensive in an area with widely dispersed communities. Will this regional structure deliver the equitable funding rural areas require ? Will investment in Montgomeryshire and specialist areas of economic development (such as agri-tech and animal health) be forthcoming ? Will Powys Planning authorities be effectively emasculated removing transparent , evidence based and democratic considerations from the planning process?

It is challenging to perceive any advantages to an artificially constructed model of this nature and CPRW Montgomeryshire requests that the rationale behind this proposal is carefully reconsidered along with the potentially advantageous four region model and a Central Eastern Region for Powys.

Concluding Comment

CPRW Montgomeryshire would particularly like to draw the attention of the WG to the vibrancy of rural communities in Montgomeryshire. We hold a prestigious bi-annual Montgomeryshire Village Award (to which the appropriate Ministers have received invitations) and have been privileged to see something of the strength of even our smallest communities: the mutual support, engagement and inclusiveness, the range of enterprise and activity and the pride of place and deep sense of belonging, culture and heritage is truly remarkable and humbling. Emasculating Local Development Plans; imposing remote Regional Administrative structures without relation or relevance to the lives of strong rural communities, and imposing industrialisation on an unprecedented scale that despoils vast swathes of landscape that provide that very sense of place, well being and real economic benefit to rural communities can never be acceptable.

Annex: Critique of The Integrated Sustainability Appraisal

The ISA, undertaken by Arcadis, was designed to inform the drafting of the National Development Framework. It claims to provide a robust and thorough mechanism for identifying issues and opportunities, assessing impacts, including cumulative and indirect effects, of options being considered for the NDF and reports on the extent to which implementation of the plan will achieve the environmental, social and economic objectives by which sustainable development can be defined. In providing the Welsh Government with accurate, robust and transparent information with regards to the sustainability of options it has played a major role in the Government's decision-making about what to include in the NDF.

The various iterations of the sustainability appraisal include a scoping report (2017), a final scoping report (2018), and a final report (2019). We applaud the fact that the drafting of NDF vision and objectives has

been subjected to extensive appraisal in these various iterations and that the process has been documented extensively. The scope of the data and recommendations in the ISA therefore need to be taken very seriously.

The Appraisal Framework uses 17 monitoring indicators or objectives and decision-aiding questions designed to embed the principles of sustainable development.

However these do not fully cross reference with either the Well-being Act goals (2015), the objectives of Sustainability Appraisal for a Low Carbon Wales (2019) or the draft NDF outcomes, among other WG and European directives which underpin the ISA. This therefore raises questions about the appraisal's claim to be thorough and holistic. A compatibility matrix assessing the internal compatibility of the 17 objectives (p53, 2018) also appears rather incoherent; for example, where as one might expect a positive compatibility of objectives 10, 15 and 16, each of which focus on environmental issues, with objective 17, 'to create opportunities for sustainable management and use of natural resources taking into account the benefits and intrinsic value', the matrix indicates compatibility is unknown. Where as objective 9, 'to create opportunities for the protection and promotion of Welsh culture' is presumed to be compatible with objective 17.

The ISA takes its definition of sustainability from the Well-being of Future Generations Act. "Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals." This circular definition based on aspirational goals is a poor starting point for monitoring NDF opportunities and outcomes. Nevertheless, Arcadia attempts to refine their understanding of sustainability (section 1) and seeks to take a more rounded view of the sustainability implications and opportunities arising from the NDF by integrating their approach to the SA and SEA with other statutory and non-statutory assessments. The following comments focus on how well we think they have achieved this with reference to renewable energy (Policy Grouping 7, ISA 2019) and rural communities in Powys. (Policy Grouping 10, ISA 2019).

The evidence base for the ISA is published as an appendix to the Scoping Report 2018 (it is not actually included in the report itself.) The baseline provides limited environmental social and cultural data that relates specifically to Wales' well-being goals. It does not include baseline trends to which the ISA frequently refers. Apart from this the ISA does not refer any to data projections or evidence to support their impact assessments of the draft NDF spatial framework despite an undertaking (p37, 2018) that the appraisal will be **"evidence-based (using qualitative and quantitative data sets) and will consider the likely effects of the NDF on the sustainability ... baseline of Wales** (SEA practical guide paragraphs 5.A.5 and 5.A.6). It therefore provides no robust appraisal of sustainability and consequently, fails to function as a test of 'soundness', unlike LDPs, which are required to be tested by a Planning Inspector to show that they are well-evidenced, appropriate for the area, coherent, and in line with other legislation. This rather begs the question why the Welsh government commissioned a design consultancy rather than planning experts to appraise the National Development Framework.

Appendix B of ISA report 2019 provides an appraisal of NDF policy impacts against ISA objectives. Our comments below question the extent to which the ISA process has provided a "robust and thorough mechanism for identifying issues and opportunities, assessing impacts, including cumulative and indirect effects" with respect to Policy Group 7 renewable energy policies and Policy Group 10 Mid and Southwest Wales.

The ISA report notes there is a "presumption in favour of large-scale onshore wind and solar energy development in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts." Whilst appraisal comments suggest the significance of potential employment opportunities in priority areas for wind and solar development is unclear, they conclude it would bring some indirect benefit to Welsh speaking communities from enhanced employment opportunities, especially if schemes incorporate local ownership. They suggest RE policy should help to address overall improvements in health and well-being for communities across Wales, including for children

and young people. In particular P12 would 'retain tranquillity in National Parks and AONBs, which provide mental health benefits.' With respect to ISA objective 13, "To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscape and seascapes", they claim 'A strategic Landscape and Visual Impact Assessment has been undertaken and the Priority Areas for Renewable Energy are considered to be the most appropriate locations to accommodate landscape change. There is, therefore, an acceptance of landscape change in these areas. However, the design and micro siting of proposals must minimise the landscape and visual impact.' Apart from this vague reference to an impact assessment there is no robust evidence provided elsewhere in the 350-page document to support this comment. With reference to the conservation and enhancement of the historic environment, historic assets and their settings (Objective 8), Arcadis notes blandly 'The design and micro siting of proposals could help to minimise impacts on local heritage assets such as nearby Listed Buildings but cumulative impacts on historic environments at the landscape-scale may be difficult to avoid' and 'It should be noted that there are a lot of registered historical landscapes outside National Parks and AONBs, but these are assumed to be included under the phrase 'historical assets' in the policy.' In their appraisal of RE policy impacts on biodiversity and geodiversity (Objective 16), Arcadis comments 'supporting text states that there is a presumption in favour of large-scale on-shore wind and solar energy development in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. There is a potential for negative effects on biodiversity assets, as P10 seeks that impacts on nature conservation sites and species are 'minimised'. However, outside of these areas P11 and P13 is predicted to have neutral effects in relation to this objective, as the policy states that planning applications must demonstrate that there are 'no adverse impacts' by way of (*inter alia*) nature conservation sites and species.' This assumption contradicts the obvious indications in the ARUP studies that the Priority Areas will have a significant negative impact on local heritage and conservation sites. As far as opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value (objective 17) are concerned, Arcadis predict renewable energy policy would have very positive medium and long-term benefits; 'P10, P11 and P13 would create the opportunities within which renewable and low carbon energy generation can help to make a tangible contribution to energy generation overall, with the target of 70 per cent of electricity generation to be generated from renewable energy by 2030. This could lead to significant effects in the medium and longer terms, as schemes are developed, leading to a cumulative effect.'

Aside from the recognition that this section is a summary of the appraisal process any adherence to SEA Requirements for an evidence-based appraisal would be unlikely to produce such bland generalities, which defy reasonable comment.

Policy Group 10 includes NDF policies relating to Swansea Bay area and Mid Wales. Arcadis makes 4 minor references to rural communities included in this Policy Group, in 20 pages of appraisal. They suggest, 'investment in connections across the region would improve inclusive access to facilities and services for all, including those in rural communities' (p213); a focus on city growth and interconnectivity would 'reduce development pressure on rural areas', (p212). The policy would have a positive impact on sustainable economic growth by helping 'to provide supply chains and infrastructure to rural areas concentrating development in the correct location without increasing pressure to develop in rural areas to create opportunities for sustainable economic growth diversity and competitiveness an [sic] increase employment across the country and promote economic inclusion.' (p206). Apart from the fact this last sentence makes no sense whatsoever, the tone of the entire section implies a total lack of regard for the needs of rural areas, the significant contribution of the tourism and agricultural industries of these areas to the economic and cultural well-being of Wales, and the connectivity infrastructure needs to develop their industries. Because the ISA has not attempted to appraise the internal contradictions of NDF policies, the cumulative impact of renewable energy policies on rural areas and the commitment to supporting rural communities in Policies 3 and 4 has been overlooked.

In conclusion, we have chosen not to examine the extent to which the ISA has embedded sustainable principles, outlined in the Well-being Act, in its process. However, given the significant weakness of the ISA to test the material sustainability of NDF Policy development or provide any tangible evidence for long-term development trends and outcomes of the policies we question the credibility of the ISA to support

adequately the decision-making process.