

From: Henry Cook [REDACTED]  
Sent: 15 November 2019 14:46  
To: NDF  
Subject: National Development Framework consultation response

To whom it may concern,

I am writing to you on behalf of the North Wales Wildlife Trust about the National Development Framework (NDF) that you are currently consulting on.

Whilst the North Wales Wildlife Trust supports the drive for sustainable green energy, the placement of infrastructure is an issue.

Our primary concern is largely regarding policies 10 and 11 of the NDF proposal document; of the potential damage caused by large-scale energy projects affecting the Anglesey Fens Special Area of Conservation (SAC) on the east side of Ynys Mon, around Energy Priority Area 1. Attention has been drawn in the NDF document not to damage the integrity of the AONB but little recourse to damage caused to the wider landscape which could affect the SAC. The nature of the Anglesey Fens SAC is that they are delicate landscapes fed by mineral-rich water from the wider catchment through the groundwater. Therefore, what goes on in the wider region affects the fens indirectly but potentially overwhelmingly. The region is currently failing under the Water Framework Directive for water quality from current land practices. Any further exacerbation of this would make compliance with regulations even more difficult, costly and would run counter to existing Welsh Government policy and legislation.

The installation of pads for up to 250m onshore wind turbines presents considerable risks which would likely affect the hydrology and immediate habitats of the area. Any alterations to the hydrology and nutrient inputs in the catchments caused by the construction and operation of large-scale energy projects could have significant impact on the fens themselves due to the connected nature of the landscape via networks such as catchments, drainage and wildlife corridors. Although the NDF acknowledges there won't be development on Natura 2000 sites within the priority areas, developments adjacent or away from the sites can still have impacts on them and to their protected wildlife and needs to be considered.

The fens are a significant store of carbon through peat formation. They play an important role in our network of carbon stores. Changes to hydrology or other inputs from developments adjacent or elsewhere could affect their ability to mitigate climate change.

We are also concerned by the potential loss of species-rich, agriculturally unimproved habitats due to the installation of large-scale solar farms. The areas of such unimproved habitats are shrinking and many of them have been identified as Local Wildlife Sites and need to be considered in the planning process to ensure their biodiversity is maintained.


The Anglesey Fens SAC is the wild heart of Anglesey and reducing the visible signs of humanity on the landscape is a priority. Adding visible infrastructure on the scale outlined in the NDF proposal document will change the nature of the landscape and is likely to devalue its perceived importance as a tourism area, which could have negative implications on tourism derived economic prosperity, particularly wildlife tourism, which in turn could be detrimental to wildlife conservation as potential funding streams and public support for habitat protection and enhancement are undermined. In addition to this, large numbers of wind turbines in expansive clusters can be highly detrimental to wildlife, particularly bird and bat species, including species that are yet to colonise Anglesey, such as Sea Eagle. Anglesey has been identified as having the best habitat for Sea Eagles in Wales, but this species is particularly vulnerable to being killed by poorly located wind turbines - as has been experienced in Norway (eventually causing the removal of turbines at massive cost).

Climate change presents one of the greatest risks to wildlife in Wales. We are only just starting to see the

beginning of a long period of affects that climate change will cause in the coming decades. The North Wales Wildlife Trust therefore agrees with a focus on renewable energy creation going forward, but how that is delivered cannot be allowed to compromise struggling ecosystems further.

Yours sincerely,  
Henry Cook.

Henry Cook | Living Landscapes Officer Anglesey Fens | Swyddog Tirluniau Byw Corsydd Môn  
North Wales Wildlife Trust | Ymddiriedolaeth Natur Gogledd Cymru



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