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To: [NDE](#); ndf@wales.gov
Subject: Personal response to draft NDF 15th Nov 2019.
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This is my personal response to the draft NDF and I would like to start by saying that I have no doubts about the overall good intentions of the proposals for the future of Wales. I do however have some serious reservations about the thinking behind and potential implementation of aspects of the plans. These are summarised below.

*The division of Wales into the areas defined in the NDF is misguided in my opinion and does not give rural areas the distinction they deserve and require. My area of mid Wales is lumped in with Swansea for example. The whole NDF is also centred very much on urban areas. There is lack of direction for rural areas in terms of employment, inequalities, transport, digital infrastructure, affordable housing, tourism and promoting the resilience and survival of communities.

*I believe that the Renewable Energy part of the NDF is very badly presented and ill thought out; it should be withdrawn, reconsidered properly and resubmitted after careful consultation. In the recent public consultation sessions, WAG's own energy experts seemed unaware of many of the points raised below. They were also apologetic for the absolutely awful mapping and documents produced by ARUP, but were unable to justify their inclusion even when the mistakes or omissions had been identified!

The aim for 70 percent RE is far out of line with the 2017 UK Energy Policy Document which acknowledges that above 30 percent "unresolved technical problems" arise, such as the System Inertia which caused the massive grid failure in August of this year. Your experts put it down to a lightning strike!

We do not have an integrated grid structure capable of coping with a high proportion of RE. Until such a grid is established there is no point developing such an ambitious RE programme. It is putting the cart before the horse.

Only onshore wind and solar projects are considered here, ignoring the potential for off shore, hydropower, biomass and other viable forms of RE.

The removal of local planning obstacles from ONE WHOLE AREA of development requiring permission, gives a green light to developers, made easier with the help of bureaucrats who have close links to the RE industry.

The concept of "Local Ownership" is ill-defined and needs much more clarification.

Another example of how the experts were unable to expand in detail at the public consultations.

It is hard to see how the RE proposals in the draft NDF addresses the aims of the Sustainable Farming Review, in terms of the huge significance of habitat, soils, pollution targets and sequestration of CO2. Farmers will be locked into years and years of sustainable practices.

On page 36 there is an acceptance of landscape change, whereas on page 60 there is a need to preserve the region's distinctive heritage, including high quality landscape.

On page 58 strategic decisions on infrastructure are to support existing communities and are to be taken on a regional basis, yet on page 36 WG will use policy levers to undermine

this and do the opposite.

Not enough consideration is given to the honestly achievable output figures for RE, especially wind power which currently generates just above 25 percent of installed capacity.

Perhaps the most unacceptable aspect of this draft plan is the erosion of local democracy, despite statements indicating that strategic decisions should be taken on a regional basis. In my area we have already experienced WG ministers undermining local planning decisions AND their own appointed Planning Inspector's decision - HENDY WINDFARM. The minister admitted she had not read all the details before reaching her decision, leaving it to technical advisors to facilitate a political aim.

For me personally, the single most obvious and depressing omission is the failure to focus on ENERGY CONSERVATION, which has to start with education and extend into incentives, rather than accepting the dubious doctrine of growth which requires increased energy generation.

Please acknowledge the receipt of this email.

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