



NDF Team,
Planning Policy Branch,
Welsh Government,
Cathays Park,
Cardiff
CF10 3NQ

dNDF Planning Consultation

Please find my concerns below

1. Renewable Energy Generation

- ***Renewable energy “Climate change and the decline in biodiversity are global challenges and the biggest issues faced by our nation”.***

I wholeheartedly agree with this statement in the NDF and understand that renewable energy will be important to help meet the Net Zero Climate change targets. However renewable energy (RE) generation should not compromise the existing ecosystem services provided in Wales which will, as a minimum, need to be maintained in the short term and enhanced in the long term. Nor should RE break up local communities

2. The dNDF does not provide justification for setting out a 20-year policy for example

- the criteria used to identify the priority areas for wind and solar, other than avoiding National Parks and AONB is not defined. The maps provided are rough and ready and at a low resolution unsuitable to help the reader understand clearly the proposed priority area boundaries. Without clarity, the criteria used the report can't be appraised or reviewed.
- The importance of whole life cycle assessment is not highlighted which affects the ability of any reader to make properly informed decisions

- Existing infra-structure is not considered e.g. much of the road network is unsuitable for additional vehicle movements and size and weight of machinery required to erect wind and solar installation without large injections of capital. These are high cost investments and the true cradle to grave costs would need to be included the carbon footprint and life-cycle assessments

3. **The NDF pays lip service to sustainable development and skates over the real issues.**

Using **Powys** (*Mid and West Wales Region*) as an example of the lack of detail in the report, it does not consider

- **Tourism**

Hay Festival's local economic impact totalled more than £70 million in the three years 2015-2018. The visitors to area do not come for the book festival alone but appreciate the countryside and all it has to offer. Many of them come back at other times of year boosting the local economy further and providing opportunities for local landowners to diversify and tell the story of the value of farming and countryside management. This vital income stream and key PR opportunity could be lost if renewable energy generation becomes the economic priority. Tourism has the potential to help a large number of people/ businesses economically and lead to stronger communities than large wind and solar businesses owned and managed by landowners/corporates. The multiplier effect of money spent by tourists in the local area will have an impact on the primary, secondary and tertiary businesses locally and help underpin a more healthy rural economy. Tourism also has the potential to influence sustainable land management and diversity in a much more holistic way than "mono culture" wind and solar farms.

- **Well Being**

Using outdoor activity as an example the priority areas include long distance footpaths, other public byways and access land which as well as supporting tourism and the local economy improve the well-being of many users including walkers, runners, mountain bikers, kyakers, horse riders, ornithologist and geo-cachers. Many of the areas are easily accessible and allow families to enjoy the countryside without the risks associated with more mountainous areas. Maintaining accessibility of these areas is key to the well-being of locals and tourists alike

- **Biodiversity.**

The rough areas delineated are home to many red data book species including curlew, hare, white clawed (native) crayfish, cuckoo. There is a lack of knowledge about the requirements of some of these species for example only this year has new information been discovered about the size of the foraging area required by curlew, something that could be jeopardised by the proposed plans for renewable energy generation.

- **Hydrology**

Area 7 could negatively impact on two SAC's (Rhosgoch Bog and the River Wye). There will be major hydrological changes from the proposed renewable energy generation which could affect

these areas. The report does not detail how natural function and hydrology will be maintained. Loss of upland mires and bogs and /or reduced water infiltration capacity of other land could affect the SAC's as well as being detrimental to surface water and river flooding in the high rainfall events predicted with a changing climate.

Additionally both the construction and management could affect water quality, a real concern to the Wye SAC and the Government's commitment to meet the Water Framework directive.

Water availability is another key issue with upland areas providing natural water storage areas from which water is realised slowly in dry spells maintaining river flow and ecological connectivity

Landscape

- The report sees landscape change as inevitable and does not assess its effect on rural areas and communities
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4. **The consultation has been inadequate**, the dNDF webpage not linking to key ARUP evidence documents, which explain the priority areas (PAs) and it has not been accessible to a large number of people (think about the poor access to and poor speeds of rural broadband, the majority of the working population not being able to access day time consultation meetings, poor rural infrastructure affecting the ability of people in rural communities accessing the consultation meetings by public transport)

 5. **Equality and Diversity; The dNDF is general (except for the tightly defined renewable energy sector) and it focuses on urban areas**, it therefore does not reflect the diversity of a country where 1 in 5 people live in rural areas and where the land has the greatest capacity to provide ecosystem services.

 6. **Democracy for rural communities; Why can the dNDF and regional strategic development plans override Local Development Plans and remove local decision-making?** The dNDF proposes large prescribed RE 'priority areas' (PAs) across 1/5 of Wales. This ignores the needs of the rural communities and appears to favour developers and large scale development.

Susan E Buckingham