

Consultation Response Form

Your name	LIAM DAVIES
Your address	
Preferred contact details (email/phone/post)	
Organisation (if applicable)	N/A

1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	Don't know	No opinion
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with any of the 11 Outcomes, please tell us why:

--

2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

PLEASE REFER TO ATTACHED MEMORANDUM.

8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

PLEASE REFER TO ATTACHED MEMORANDUM

14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

on agricultural land
Farming communities in rural Wales are key to preserving the Welsh language and fostering its development. Regrettably the siting of solar farms in areas such as Priority Area 13 will irreparably harm the Welsh language as they will disrupt normal farming practices (which are predominantly conducted in the Welsh language) and solar farms are constructed and managed by often by foreign companies (non-Welsh speaking).

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use

the Welsh language and on treating the Welsh language no less favourably than the English language, and

- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

--

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

Please refer to attached memorandum.

16. Are you...?

Providing your own personal response	<input checked="checked" type="checkbox"/>
Submitting a response on behalf of an organisation	<input type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	<input type="checkbox"/>
--	--------------------------

Memorandum attached to Consultation Response Form in respect of the National Development Framework 2020-2040 for Wales submitted by Liam Davies dated 14 November 2019

Please find below comments to the Welsh Government in response to their Consultation process on the National Development Framework 2020-2040. These are submitted prior to the extended deadline of 15 November 2019.

I wish to preface my responses and representations by emphasising that I accept the need for and support renewable energy generation as an essential element of the strategy for combating and mitigating climate change. I also consider that solar energy can also bring in its wake significant socio-economic benefits when promoted and sited appropriately.

The draft NDF deals with energy projects at pages 36 to 43. Certain areas of the country appear to be designated as those which are suitable for wind and/or solar energy projects. These are described as Priority Areas and are subject to Policy 10. The policy starts by saying:

“The Welsh Government supports large scale on-shore 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”

On page 37 there is a little more detail as to the general approach:

“Large scale wind and solar renewable energy development can be visually prominent. A strategic review of landscape and visual impact identified the Priority Areas for Solar and Wind Energy as 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, particularly those in close proximity to built-up areas”

You may be aware that there are proposals to develop a 230 acre solar farm (the so-called Penderi Solar Farm) just inside what is described as Priority Area 13 (please see attached magnification of the map of Priority Area 13). I wish to propose to the Welsh Government that the boundary of the same should be re-drawn so as to exclude the Penderi Solar Farm on landscape grounds and also because of its location on productive agricultural land in close proximity to built up areas i.e. Llanelli is the most populous town in Carmarthenshire and the draft NDF proposes to “permit” this industrialisation (in the sense of a presumption in favour of development) in the only pleasant bit of green belt between Llanelli, Swiss Valley, Llangennech and Llannon (and Pontarddulais) (the satellite urban areas of Llanelli) – i.e. the one bit of rural relief from the urban pressure cookers is being destroyed. This seems to be entirely inconsistent with many of the laudable policies set out in the draft NDF with its emphasis on:-

Accessible green and open spaces (p.20 outcome 1)

Preserving the character of rural Wales (p.20 outcome 2)

Preserving Welsh as the language of local communities (p.20 outcome 4)

Ensuring Biodiversity is sustained to maintain Wales as a special place (p.21 outcome 10)

Not to squander key assets in the form of productive countryside and natural resources (p.22)
Protecting rural areas from loss of countryside (p.26)
Creating positive impacts on public health and well being (p.22)
Green infrastructure enhancement in our urban areas (p.22)
Recognising Llanelli as a nationally significant place (p.24) within the “resource rich region” of Mid and South West Wales with outstanding natural resources of agricultural land and high quality landscape (p.60)

I would therefore urge the WG to reconsider and redraw the boundary of Priority Area 13.

As for benefits at page 36 of the draft NDF it is stated:

“We have set the following ambitious targets for the generation of renewable energy:

.....

For new renewable energy projects to have at least an element of local ownership by 2020”

The draft NDF does not define what is meant by ‘local ownership’ nor does it define what is meant by ‘new’ in 2020. Is a project in which pre application consultation took place in 2019 ‘old’ or one where the application was made in 2019 ‘old’ or, alternatively, is any project where consent is given in 2020 or later a ‘new’ project. I should be most grateful if the WG could provide me with clarification on this point.

Another matter to note about the passage at page 36 is that it is described as an ‘ambitious target’. An ‘ambitious target’ is not necessarily the same as a pre-condition which has to be met and local ownership does not form part of any of the subsequent policies. Rather, all of the policies include the formula “Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and that there are no unacceptable adverse effects on, or due to, the following:.....”.

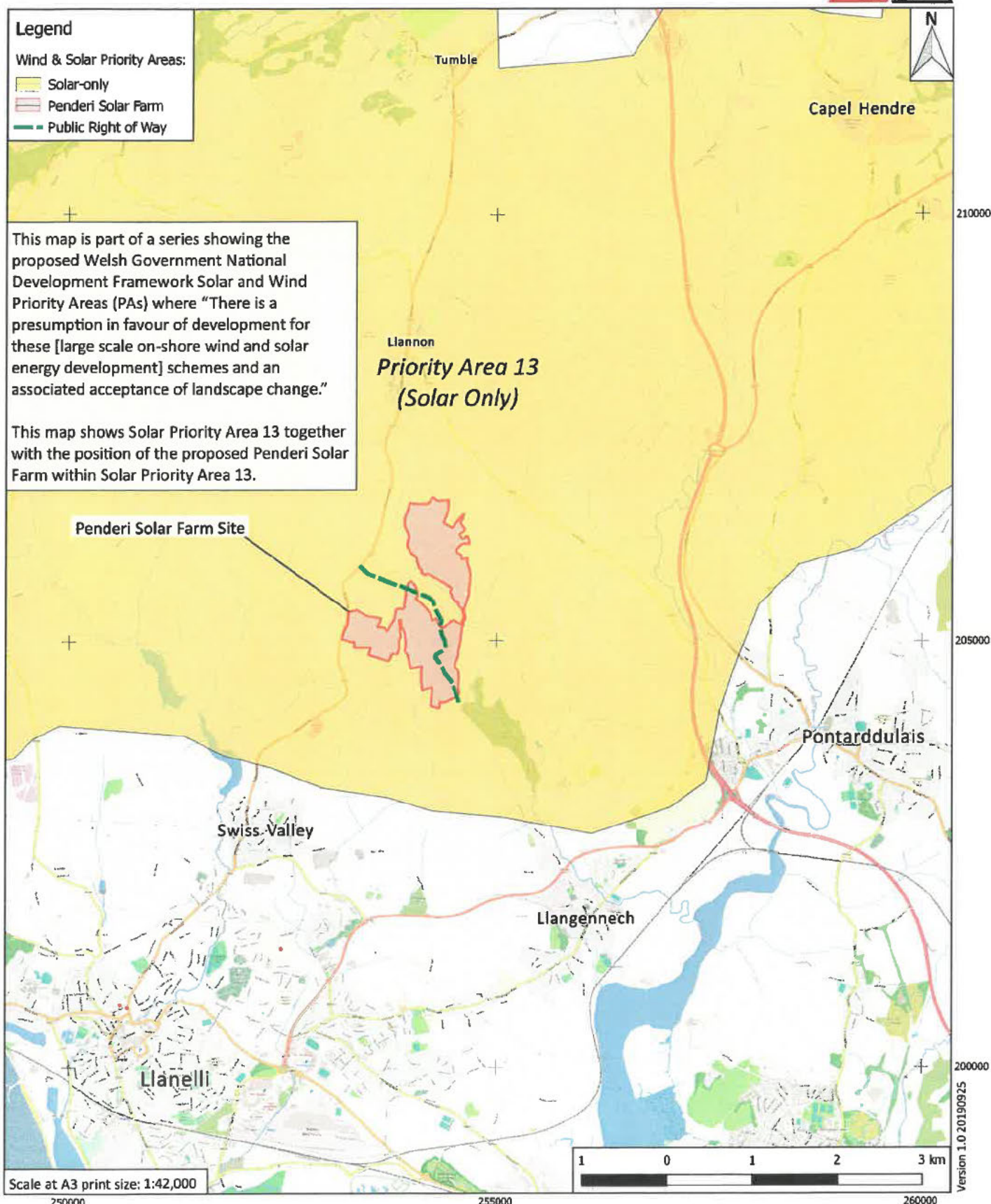
I therefore assume that it is open to any objector to argue that any project which does not have an element of local ownership fails to ‘maximise social and economic benefits’.

Please could the WG clarify exactly what ‘local ownership’ means in the context of the NDF. Is there any other documentation which sheds light on what is meant by the 2020 local ownership ambition?

Thank you for your consideration of the above points.

Liam Davies

Welsh Government Draft National Development Framework: Solar Priority Area 13 and Penderi Solar Farm



© Brecon & Radnor Branch of Campaign for the Protection of Rural Wales 2019 www.brecon-and-radnor-cprw.wales

Penderi Solar Farm site digitised from voltaia / Pegasus document "WHERE IS PENDERI SOLAR FARM?" (links to https://docs.wixstatic.com/ugd/7fde8_ba826b82ac6e4ae1bd0c68fe238fcb0e.pdf).

Wind & Solar Priority Areas digitised from Welsh Government document "Draft National Development Framework".

Public Right of Way digitised from "Public Rights of Way" on Carmarthenshire County Council website carmarthenshire.gov.wales.

Base map OpenStreetmap © www.osm.org/copyright.

