

From: [James Flecker](#)
To: [NDE](#)
Subject: Considerations on reading your NDF
Date: 14 November 2019 14:45:36

Dear Welsh Government,

You have been elected as the guardians of one of the most beautiful countries in our planet and have responsibility both for the heritage and the future of Wales. In my brief response to your National Development Framework I am asking you to reconsider your strategy for renewable energy in the light of this responsibility.

In his Forward to the NDF Mark Drakeford writes that “it is another building block in making Wales a fair, green and prosperous place,” and Julie James in hers writes of “our ambition to make Wales a healthier, fairer and more prosperous place.” These are laudable ambitions, but not at any price, not, surely at the price of the potential desecration of vast swathes of rural Wales.

It is also of paramount importance that your plans for renewable energy go through a proper democratic process, as most palpably did not happen in Powys recently.

The people of Powys had challenged the erection of a wind farm in the wonderfully beautiful area round Hendy, near Llandrindod Wells and Powys County Council denied the developers planning permission. The developers appealed against this decision on the grounds that the production of renewable energy trumped all other considerations. After a lengthy and costly inspection, Powys County Council’s decision was upheld. Whereupon the member of the Welsh Government responsible, having barely had time to read the inspector’s report, overrode the whole democratic process and waved the developers in. This was the act of an autocracy, not a democracy. If you want to take the people of Wales with you for your NDF, you must scrupulously observe proper democratic process and not act as you did in Powys, or your proposed National Development Framework will seem to be what might have been expected from a dictatorship rather than from a democracy.

Clearly the driving force behind the priority areas of your NDF is the desire to produce renewable energy. This is an imperative not just for Wales and the UK but for the whole planet. The main sources of renewable energy so far discovered are nuclear, hydro-electric, wind power and solar power, to which I would add tidal power, though the technology for this has yet to be perfected.

Each nation in the world has the detail of its own particular geography which will help it to play its part in the global drive for renewable energy with as little impact on its own countryside and people as possible. Some countries, being mountainous, will be able to achieve it with energy from remote hydro-electric schemes. Some will have areas of their country which are suitable for nuclear power stations, though there are still major problems to be solved when it comes to their eventual decommissioning. Some countries are able to situate their wind and solar farms in deserts. Some countries border the sea and are able to place their wind farms out of sight of land. If a country has none of these geographical advantages for the production of renewable energy, it will have to resort to the nuclear, wind and solar solutions in areas of its countryside where there is as little impact on the population as possible.

The mountains of Wales do not appear to lend themselves to major hydro-electric solutions and the country has no deserts. It does however have sea round its north and south coasts and, most of all, along the length of its west coast. There should surely be a presumption

that most, if not all, of Welsh renewable energy production should happen out at sea where it has virtually no impact on any people in Wales at all.

It will be argued that wind farms out at sea are too expensive to install, though I have heard that the cost has recently come down 30%. However, if you factor in the human costs of your proposed priority areas extending to a fifth of the countryside of Wales, the potential desecration of hillside and moorland of sublime beauty, the damage to farming, to tourism, the impact on the rural population's health, wealth and well-being, the reduction of the value of the land and of individual houses, then the cost of installations at sea surely pale into insignificance in comparison to those on land. Is it that the Welsh Government has not factored in such considerations? The complete absence from your NDF of any mention of off-shore wind farms or investment in tidal technology suggests that it has not.

If there were no other way to provide Wales' share of the United Kingdom's quota of renewable energy, your plan might be, reluctantly, acceptable as the way Wales has to go. But there are other ways: there are off-shore wind farms and the potential of tidal technology and these appear not even to have been considered and therefore it must also be questioned whether your plan passes the first test of due process.

Please, Welsh Government, be mindful of your responsibilities as the guardians of the beauty and heritage of Wales and remember that your country is a democracy and that you have responsibility for the whole population you serve. The need for all countries in the world to combat the effects of climate change is urgent, but not so urgent that it doesn't matter if the plans for it are wrong.

In their forwards Mark Drakeford used the word "fair" and Julie James "fairer." Unless you are willing to change your strategy, I doubt if either the process or the outcome of your NDF will seem to be that to the people of Powys.

Yours sincerely,

James Flecker

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14th November, 2019