

**From:** [REDACTED]  
**To:** [NDE](#)  
**Subject:** Response to Draft NDF Document  
**Date:** 13 November 2019 13:52:13  
**Attachments:** [L - Welsh Government-ND Framework.docx](#)

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Dear Sir / Madam

Please find attached my unsigned response to your draft NDF document.  
I will post the signed copy to you today and trust you will receive it before 15 November.

Kind regards

David Huggins



13 November 2019

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

Dear Sir / Madam

**RE: Response to Draft National Development Framework**

I have read the draft NDF policy document, however, I am responding to Policy 10 section on Wind and Solar Energy in Priority Areas. I accept the document is only a framework and an initial development plan outlining an **ideal** way forward. In presenting its strategy it adopts a very general and broad approach to the many issues and uses official speak and jargon to impress and blinker the reader. With regard to the development of large scale wind and solar energy explained on Page 36 it appears to also assume an autocratic style by stating that '.....are classed as Developments of National Significance and are determined by Welsh Ministers'. This, surely, is undemocratic as it is blatantly preventing input from regional and local councils, businesses and the local people who will be affected by the inevitable disruption and considerable landscape changes. One hopes that this proposed OP will be amended to allow a formal and thorough consultation process with presentations and meetings at every stage and to the many communities impacted.

In 2015, at the height of the TAN 8 renewable energy programme in Montgomeryshire, I attended the National Grid and SP Manweb public consultation events at Aberhafesp, Clatter, Trefeglis, Meifod and Cefn Coch. One also hopes a similar programme will accompany the NDF renewable energy proposals so that every community affected will have an opportunity to comment.

The introduction on Page 36 goes on to quote there will be a 'focus on maximising benefits and minimising impacts. Communities will be protected from significant cumulative impacts to avoid unacceptable situations .....'. That statement is **pie in the sky** and is far from the inevitable reality. Because of the TAN 8 episode every community in Montgomeryshire knows the real situation with regards to landscape change, being surrounded by wind turbines and transmission power lines, not to mention hillsides festooned with solar panels, and how any large scale development will affect their daily lives forever, the heart and soul of their surroundings and the magnificent scenery of Montgomeryshire. (I believe there is a case for making Montgomeryshire an Area of Outstanding Natural Beauty).

There is also a throw away statement on Page 36, 'The development of Priority Areas will assist in co-ordinating strategic action, bring a critical mass of new renewable

developments together to build the case for **NEW or REINFORCED GRID INFRASTRUCTURE**'. Translated into plain and simple English this suggests that transmission power lines will extend from the Newtown area to Shrewsbury, as in the TAN 8 proposals, totally industrialising a corridor through the entire area. How do you avoid the march of pylons from affecting the communities in their path? Consult the TAN 8 records and note how the residents of Meifod reacted to the National Grid proposals in 2015. If the map on Page 42 is to be believed and all Priority Areas are developed then there will have to be an elaborate network of transmission lines to connect into a National Grid **hub** to Shrewsbury or an alternative location. As we also found in 2015 there will be a need for such stations for conversion purposes and if there are numerous large scale developments across an extended area then more than one hub may be required. These installations are considerable structures, cover a large area and totally transform the immediate natural landscape into an industrialised one. Making the case to local residents that they must now live in an industrialised zone will be difficult when they have lived amongst fields, hills and woods for years, maybe generations!

Another 'official speak' word used frequently throughout the document is **SUSTAINABLE**. I ask the question, who determines what and how much is sustainable? Will it be the Welsh Government, the UK Government, Strategic or Local Development policy makers or the people who will be affected? In Policy 3 section the document discusses the issue of supporting rural areas and how new development and diversification would facilitate the process. I accept the logic in such a statement but, again, how far can new development and diversification be allowed before someone, an environmental agency or the local people, declare **enough is enough**. Will they be listened to and due consideration given to their concerns?

There is no limit to the scope of sustainability and the principle applies to whatever is proposed for Mid Wales. The people who lived through the TAN 8 experience realise the implications of sustainability and how that proposal was in effect unsustainable and too drastic and devastating for an area of natural beauty. The same will apply for any new large scale proposal whether it is wind turbines, solar panels or transmission power lines. In summary, therefore, I believe the Mid Wales landscapes should be protected and the extent of the proposed landscape change that would result would be totally unacceptable

Somewhere in your draft document you mention the importance of tourism and the considerable revenue it generates. Mid Wales contributes to this revenue because local people, including farmers, use the scenic landscapes to successfully diversify thus supporting themselves and the rural communities that surround them. Dramatic changes to the landscape, as proposed in the draft NDF document, would seriously undermine business and employment opportunities.

We also discovered in 2015 that to implement the TAN 8 proposals roads and country lanes would need to be widened and bridges reinforced. It soon became apparent that access was a major problem and any attempt to improve it would be a logistical and strategic nightmare and cause yet further disruption to an already heavily disrupted area.

My conclusions are straightforward! First, any proposal must be discussed and considered by all interested parties, at every level, and each must have an opportunity to comment and, second, the Welsh Government must be transparent and democratic with

the way it proceeds with its National Development Framework.

Yours faithfully

David Huggins