

Draft National Development Framework

1. NDF Outcomes (chapter 3)

Q1. 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?

No Response

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

No Response

2. Spatial Strategy (policies 1 - 4)

Q3. 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...

No Response

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

No Response

3. Affordable Housing (policy 5)

Q5. 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?

No Response

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

No Response

4. Mobile Action Zones (policy 6)

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

No Response

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

No Response

5. Low Emission Vehicles (policy 7)

Q9. 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?

No Response

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

No Response

6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

No Response

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

Q12. 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					X		
District heat networks							

Q13. 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?

My response concerns the draft policy number 10 – wind and solar energy in priority areas. To begin my response falls within three divisions. 1) The establishment of priority areas. 2) On-shore wind turbines and 3) the proposal for wind turbines on Anglesey. Taking these in turn:

1) The establishment of priority areas.

The foreword to the National Development Framework (NDF) by the First Minister states in the final paragraph "a great deal of collaboration from stakeholders and communities has gone into the preparation of this document". In addition the foreword by the minister for housing and local

government in the final paragraph states "It has benefited hugely from the involvement and contribution of stakeholders throughout its preparation".

In reality the opposite has happened. At no time before the drafting of this plan have I or any other members of the community been notified of or consulted about the plan. The Welsh Government (WG) has kept the exercise within a small number of stakeholders who neither understand nor care for the needs of Welsh communities.

The WG engaged the consultants Ove Arup and partners to undertake an assessment of large scale on-shore wind opportunities as described in the "Priority areas for solar and wind energy: executive summary stages 1 and 2". Much emphasis is given to the development of the "on-line tool" which used parameters input to establish suitable locations. It is clear that the limited number of stakeholders allowed an input did not produce the correct or complete parameters for the on-line tool.

Therefore the draft framework erroneously has identified nine separate large swathes of Welsh countryside deemed suitable for the erection of enormous wind turbines in industrial quantities. To any independent and sane observer this is plainly nonsense and utterly shocking. I urge the WG to re-visit its selection of stakeholders and the parameters employed in establishing priority areas.

The NDF states within policy 10: "There is a presumption in favour of development for these schemes and an associated acceptance of landscape change". This is an enormous statement seeming to give a green light to industrial development. It is a dreadful abuse of power to simply decree such a policy without consultation or the opportunity to respond. The NDF document simply states that large areas will be defined as "priority areas". This is the action of a dictatorship not a democracy.

Further evidence of the deliberate lack of consultation with this enormous set of proposals is with the public consultation events. There were simply twelve events in total. One event at each of twelve locations. Plus the events were described as demand led and an appointment slot had to be booked to attend. Also these events were not widely publicised, every household in Wales should have been leafleted about the development of the NDF and given an opportunity to contribute. The WG is quick enough to leaflet all households at election times. By no stretch of the imagination was this genuine public consultation. It was an exercise in doing the minimum and still be able to say the public had been consulted.

2) On-shore wind turbines.

The NDF has an obsessive belief in wind turbine energy. It completely fails to consider the benefits of other renewables including tidal energy, domestic solar and heat exchange systems. It also fails to consider the benefits of new technology nuclear power. This is at a time when the UK government is investing £58 million of public money in small modular reactors (SMR) and advanced modular reactors (AMR). The truth of the matter is that wind turbines are internationally wildly unpopular old technology. It is well documented that Germany has had endless legal challenges from communities afflicted with these monstrosities and progressively fewer proposals are approved.

The WG blind belief in wind turbines can be traced back to the Labour party manifesto for energy named "Thirty recommendations by 2030". Page 82 of the document lists the benefits and drawbacks to wind turbines. The drawbacks are listed as:

- Wind is intermittent and difficult to predict over the long term (but very predictable over the course of a day)
- Suffers from NIMBY (Not in My Back Yard) as turbines can be aesthetically displeasing for some people
- Can have a minor impact on wildlife such as birds and, if inappropriately sited, will disturb marine habitats

So the authors of the report believe there are only 3 drawbacks, one of which is minor. The effect on communities is patronisingly dismissed as not in my back yard NIMBY. It reads like ministers invited a slick wind turbine salesperson into a meeting and were hopelessly impressed and hoodwinked into buying in to wind turbines, at a time when others are getting out. There is not one mention of the very real drawbacks caused by noise, shadow, flicker, reflected light and electromagnetic disturbance. Not to mention the awful blight on communities caused by living under the monsters.

Bullet point one of NDF outcomes at page 18 of the NDF states: "A Wales where people live in connected, inclusive and healthy places". If the WG carries out its proposals to build these industrial scale wind turbines it will be deliberately blighting and damaging the health and well being of the communities it is supposed to serve. I urge the WG to re think its proposals and open its mind to better technologies.

3) The proposal for wind turbines on Anglesey

Not one of the 12 public consultation events was held on the island of Anglesey. Its people have been excluded from the already token consultation the WG deemed appropriate.

Anglesey is a small island off the North Wales coast of approximately 32 miles in diameter. It is a rural area comprising many small communities throughout its interior. Its economy has two main contributors, tourism and farming. Tourism is the biggest earner bringing in over £300 million per annum. The appeal of the island to tourists is its natural unspoilt beauty. Whilst 95% of its coastal areas are designated as areas of outstanding natural beauty (AONB) its interior shares that natural beauty loved by visitors. The tourist industry thrives throughout the island.

The geography of the island is mainly low lying, the highest natural feature being Holyhead mountain at 200 meters. The highest man made feature is Lord Anglesey's column at 27 Meters.

Anglesey is one of the jewels in the Welsh crown. It is regularly featured in films and television programmes, not least Welsh productions in the Welsh language. Its beauty and history are used as a backdrop or the core of a feature.

I have provided this brief pen picture because I can only imagine that neither the authors of the NDF or ministers involved can have ever been to Anglesey or have any knowledge of it. It would be difficult to identify an area more unsuitable for the erection of industrial scale wind turbines up to 250 meters high. However the NDF has nominated vast swathes of the island interior amounting to around one third of its total land mass as a "Priority area" with all the consequences that title contains. Building these wind turbines would be no less than the industrialisation of our green spaces, vandalising our communities, towns and villages.

On the 9th October the AM for Anglesey Rhun ap Iorwerth asked a question of Lesley Griffiths the minister for energy, planning and rural affairs. He advised her of the inappropriateness of the wind turbine proposals and of the real fear such proposals have created. In her response the minister stated the concerns of communities will be taken into account and that there are real alternatives to wind turbines in the form of tidal power etc which she had seen for herself.

I urge the WG to re think and re-appraise these wind turbine proposals, this time genuinely consulting those potentially affected; Listening to their concerns and acting with the interests and well being of people living in Welsh communities at the heart of any proposals.

8. The Regions (policy 16)

Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale? 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.

No Response

9. North Wales (policies 17-22)

Q15. 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?

No Response

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

Q16. 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?

No Response

11. South East Wales (policies 27-33)

Q17. 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?

No Response

Q18. 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.

No Response

12. Integrated Sustainability Appraisal

Q19. 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.

No Response

13. Habitats Regulations Assessment

Q20. 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?

No Response

14. Welsh Language

Q21. 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?

No Response

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: 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 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.

No Response

15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

The authors of the NDF have sought to limit and channel any feedback from its most important stakeholders, the people of Wales. A standardised form created by the authors is designed to keep responses within the authors agenda.

16. Are you...?

Q24. Are you:

Providing your own personal response

Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Martyn Cash

Organisation (if applicable) -

Preferred contact details (email/phone/post) [REDACTED]

Q26. If you want to receive a receipt of your response, please provide an email address.
Email address

[REDACTED]

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response