

**From:** [Finney, John](#)  
**To:** [NDE](#)  
**Subject:** NDF consultatio response  
**Date:** 13 November 2019 09:58:37  
**Attachments:** [NDF\\_response\\_Finney.pdf](#)  
[ATT00001.txt](#)

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Dear Sir/Madam:

Please find attached my response to the NDF consultation.

I apologise for not responding using the web form, but I have had problems using it (may be my very poor internet connection that I hope policy 6 will improve!). Accordingly, I have kept as close as possible to the format of the Consultation Response Form, so I hope my responses are clear.

My submission is a pdf document. Please let me know if you would prefer it as a Word document.

Thank you.

Regards,

John Finney

# RESPONSE TO NDF CONSULTATION WG38167

**From:**

Prof. John L. Finney FinstP FRSC

[REDACTED]

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Preferred contact method: email [REDACTED]

I am responding in my personal capacity as a resident.

## 1. NDF Outcomes (chapter 3)

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

### ***Agree***

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

### ***Agree with most of them***

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

While outcomes 9, 10 and 11 on their own sound laudable, there are potential conflicts between them that I do not think are fully appreciated in the detailed policies proposed. For example, the potential conflicts between retaining and enhancing biodiversity and renewable energy infrastructure, and between renewable energy infrastructure and landscape (one of Wales's major resources that is central to Welsh identity and its tourist industry), do not seem to me to be effectively addressed. Moreover there appears to be no appreciation of the need for effective carbon accounting that is required if renewable energy proposals are to deliver realistic reduction in CO<sub>2</sub> emissions. I comment in more detail on these issues with respect to the relevant policy proposals.

## 2. Spatial Strategy (policies 1 – 4)

- To what extent do you agree or disagree with the spatial strategy and key principles for development in Urban areas (Policies 1, 2 & 3)

### ***Strongly agree***

- To what extent do you agree or disagree with the spatial strategy and key principles for development in Rural areas (Policy 4)

### ***Strongly agree***

### 3. Affordable Housing (policy 5)

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

***Agree – but see comments immediately below***

Comments:

(a). Considering the dire problem of housing, I think the 'target' of 47% implied here (page 30) is far too low. The priority should be on affordable housing – this % should be much higher.

(b). Considering also the emphasis on the climate crisis, planning should only be agreed for homes that are energy efficient – the ambition should be zero-carbon ones. Noting that housing is a major contributor to the UK's total CO<sub>2</sub> emissions (I think the figure is about 8%), building high quality homes will be a significant contributor to reducing Wales's demand for energy and hence reduce its CO<sub>2</sub> output.

### 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?

***Agree***

Comment:

In siting of infrastructure, consideration should be given to potential negative effects on environment and biodiversity. For example, installing hard access tracks across sensitive areas needs to be avoided, and done with care if deemed absolutely necessary.

### 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***

Comment:

As an eV driver, I find the current poor infrastructure is a serious problem. But a serious problem also is that there are too many suppliers of charging points, each of which has a different access procedure (e.g. join their 'club', use an RFID card they supply, or use a mobile app – not helpful when the mobile coverage is poor...). If electric vehicles are to be attractive to use, then recharging must be a simple operation like filling up with petrol is – i.e. all that should be needed is a credit/debit card.

The charging infrastructure in Scotland has been revolutionised in recent years with the setting up of a national network. We need something similar in Wales – though without the need to join a network as you have to do in Scotland.

## 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?

### ***Generally agree but with the following caveats:***

(a). I strongly endorse the intention to “*expand and make connections between our designated sites to increase the ability of species and ecosystems to adapt to the pressures of climate change and pollution.*” Connection of sites is a very important aspect of trying to maintain and enhance biodiversity. However, the idea of identifying a limited number of areas is worrying. In terms of rural Wales, much of the habitat is relevant to biodiversity, and where it has been damaged, there is often potential to repair, with positive consequences for enhanced biodiversity and mitigation of the effects of climate change. If a specific identification policy is to be adopted, it would be more effective in terms of enhancing biodiversity to identify areas where there was no realistic possibility of enhancement, and focus infrastructure development on those areas.

(b). Considering the proposed policies w.r. to renewable energy infrastructure, the priority areas proposed for solar and wind development are flush with areas of biodiversity. So to be consistent with the aim of increasing biodiversity, these areas should be a prime target for protection and biodiversity enhancement, rather than being made the prime target for infrastructure development. There is thus an inconsistency between the good intentions of policy 8 and those of policy 10: having a presumption to development in these biodiverse areas goes directly against the intentions of policy 8 and makes me sceptical that policy 8 carries any real weight.

(c) With respect to the National Forest, to preserve existing biodiversity it is critical that this development should not take place on land whose biodiversity would be negatively impacted. I assume that the forest will be essentially of hardwoods, and not make the mistakes made in earlier afforestation of, for example, peatland and other carbon land which is effective as carbon sinks.

## 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... Large scale wind and solar developments

### ***Strongly disagree.***

Comments:

(a). As indicated in earlier comments, this presumption in favour of renewable energy development in the mapped priority areas goes flatly against Policy 8's aim of enhancing biodiversity and ecosystem resilience. Natura 2000 sites might be protected, but there are many other high value sites within these areas whose biodiversity and resilience this policy would threaten.

A presumption in favour of development would leave these sites particularly vulnerable to serious negative environmental effects of proposed developments. I am sure that developers will see this 'presumption in favour' as a charter to cover the specified areas

with large wind turbines, confident that it will be difficult to argue on behalf of protecting biodiversity and the landscape. *To be consistent with policy 8. all proposed developments should be subject to the same conditions w.r. to protecting biodiversity.*

(b). The same considerations should apply with respect to landscape, which this policy appears to sacrifice. The landscape is a major aspect of Welsh identity, and for this policy to dismiss its value in this way policy 10 does goes against that core value. Devaluing landscape in this way will also threaten the tourist industry – polls in Scotland repeated reveal that siting of windfarms in high value landscapes are a major deterrent to tourism.

(c). Not all renewable developments (especially wind) will necessarily reduce CO<sub>2</sub> emissions. A study by Aberdeen University<sup>1</sup> has shown that, unless very carefully sited and constructed to avoid destruction of peat or other carbon-absorbing land, up to three quarters of a wind farm's gross carbon saving could be lost, and hence the development would be of only marginal benefit. Therefore, to ensure planning decisions relating to CO<sub>2</sub> savings are solidly evidence-based, *independent carbon budget assessments should be provided in all proposals for installation of 'green' infrastructure to ensure that it really will result in significant reduction of CO<sub>2</sub> emissions.*

(d). Some of the priority areas are relevant to important bird flyways – as well as the residences of red-listed birds, to say nothing of bats. So a presumption in favour, unless there is the requirement to produce a full independent environmental impact assessment, would further threaten the biodiversity that policy 8 places so highly.

As stated on page 56, “the protection and enhancement of areas of environmental and landscape importance should inform strategic decisions on locations for growth and new infrastructure”. The singling out for ‘light’ planning treatment of priority areas which themselves are “areas of environmental and landscape importance” is inconsistent with this “collaborative, holistic approach”.

You ask for alternative approaches. These could include (i) siting renewable energy infrastructure in locations that – unlike in the priority areas – do not damage landscape and biodiversity; (ii) new housing to be carbon neutral as suggested above; (iii) retrofit housing to be less carbon-expensive; (iv) encouraging electric transport for both private vehicles and public transport (including an effective national charging infrastructure as mentioned earlier); (v) district heat networks (as the NDF proposes); and (vi) encouraging energy-saving actions by the public, industry and commerce, and public services.

With respect to National Parks and AONBs, I agree strongly that they should be out of bounds for renewable infrastructure. Moreover, developments in locations within view of these areas should be discouraged.

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

**Strongly agree**

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1 D.R. Nayak et al. Calculating carbon budgets of wind farms on Scottish peatlands. *Mires and Peat*, Volume 4 (2008–2010), Article 09, <http://www.mires-and-peat.net/>, ISSN 1819-754X

## 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?

***Generally agree but with caveats as mentioned with respect to policies 23-26 commented on below***

## 9. North Wales (policies 17-22)

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

***Agree***

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

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

***Strongly disagree***

Comment:

The Region is too large and disparate to be considered as a single region. There is little connectivity between Mid and South West Wales, and the planning issues of these two 'sub-regions' are very different. It is clear from the document that the emphasis and focus in this 'regional' discussion is on South West Wales, with little recognition of the issues that are of importance to West Wales. So there is a misfit here with Policy 4's aim of supporting rural communities. It is more than likely that a regional scale development plan will be dominated by the issues of importance to South West Wales. So if a regional approach is to be taken, then Mid Wales needs to be a separate region.

That said, I am largely in agreement with policies 23-26, though noting again that these refer almost exclusively to South West and not Mid Wales. Moreover, the 44% affordable housing target is far too low.

## 11. South East Wales (policies 27-33)

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

***Generally agree, with the exception of policy 32***

Comment:

Expansion of airport facilities is inconsistent with the overall policy of moving towards a greener country. While I can understand the economic arguments for improved transport infrastructure, that should be based on improving 'greener' transport modes, while minimising those such as air travel. The electrification of the GWR line is already resulting

in a more reliable service that will help improve connectivity with both Bristol and Heathrow airports.

### **13. Habitats Regulations Assessment**

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

Comment:

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. This is excellent, but as many of these areas are in the priority areas for wind and solar development, there is a disconnect in the plan when there is a presumption in favour of infrastructure proposals for those areas. I also find it odd that (a) National Parks and AONBs and (b) extensive biodiverse areas such as the Cambrian Mountains appear not to be covered here.

### **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?

Comment:

As I hope is clear from various of my comments above, I am deeply disturbed by the implications of selecting priority areas for wind and solar development with a presumption in favour of development. If the NDF is to be true to its aim of making 'A Wales where people live... in places with biodiverse, resilient and connected ecosystems', *all* proposals for infrastructure development – both within and without the proposed priority areas – must logically be subject to the same planning constraints. Moreover, the priority must – to be consistent with the stated aims of enhancing biodiversity and ecosystem resilience – put stronger emphasis on preserving and enhancing sensitive biodiverse environments and landscape. The NDF draft as it stands looks like being a charter for developers and could lead to an industrialised landscape that will result in loss of biodiversity as well as creating a deterrent to tourism.

Furthermore, in order that the siting of renewable infrastructure should really lead to substantial reduction in CO<sub>2</sub> emissions, it should be solidly evidence based. Planning applications should therefore be accompanied by an independent assessment of the carbon budget, as poorly planned or constructed schemes can – and have – led to destruction of natural carbon sinks.

The Well-being of Future Generations (Wales) Act 2015 demands that development and use of land contribute to improving the social, environmental and cultural well-being of Wales as well as the economic. I fully accept that achieving a low carbon economy that also supports biodiverse and resilient ecosystems is a challenge. But by setting aside some of our most biodiverse areas of land as places where there is a presumption for development, the draft NDF fails to fulfil the requirements of that Act.

**16. Are you...?**

I am providing my own personal response.

I am happy for my responses to the consultation to be shared with the National Assembly for Wales and to be made public.

