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Attached is our response to the draft National Development Framework regarding renewable energy projects in Wales.

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# **Response to the Draft National Development Framework**

**November 2019**

## **Introduction**

We are in favour of the Welsh Government's commitment to maximising the generation of renewable energy and decarbonisation and tackling the causes of climate change. We are also not against large scale wind and solar development projects if located in appropriate areas and developed on a proportionate scale.

However we are not in favour of the extent of the proposed developments and the amount of landscape change that could be involved. We have a specific interest in PA 7 and are worried about the possible impact of these proposals on the surrounding hills. Below we set out some of these concerns.

## **Disregard for local democracy**

There is already a presumption in favour of these large scale on-shore wind and solar energy developments in the Priority Areas (PAs)(P 38) after minimum local consultation plus disregard of the Powys Council Local Development Plan. The Hendy Wind Farm experience when the Welsh Government decision to override its own Planning Inspector's findings does not give any confidence that landscape, environmental and social considerations will be given sufficient weight when these proposals are implemented.

## **Impact on biodiversity and ecology**

Despite the Welsh Government stated commitment to *reversing the decline in biodiversity and increasing the resilience of our ecosystems* and to *safeguard ecological networks, and to maximise the use of green infrastructure and nature based solutions* (P 36) we believe that in PA 7 the reverse of these outcomes will result. Many of the moors in these areas are well maintained with the specific intention of looking after the ecology and natural ecosystems. Disruption on the scale suggested would upset the tranquillity of these areas and the natural habitat of much of the local flora and fauna.

The areas of the Welsh Uplands close to PA 7 are known habitats for many endangered species and a considerable amount of time and investment is currently being expended to arrest the decline. Large scale renewable energy

projects in these remote areas, without sensitive planning, would risk the progress that has been made in restoring the moorlands to the condition they enjoyed decades ago. Arresting the decline in biodiversity is precisely the end game for these managed moorlands.

Carbon capture on the hills is also important in the drive towards decarbonisation and tackling the causes of climate change. The management of the hills helps prevent overgrazing, bracken invasion and summer wildfires. The work helps preserve the carbon locked-up in underlying peat. Ditches and drains are being blocked to help re-wet bogs and prevent upland carbon loss. Sphagnum moss, known as the king of carbon capture, is nurtured and at present flourishes on the hills. None of this might continue if these proposed developments near PA 7 go ahead. Furthermore we have little confidence that NRW would be able to protect either designated sites or locally important sites within the PAs.

Several sites within the PAs are Sites of Special Scientific Interest and the methodology for the identification of the PAs seems flawed, relying on 'fixed constraints' which exclude important environmental protections.

The draft Framework states that *Renewable energy projects can also provide environmental benefits, such as contributing to resilient ecological networks, restoring degraded peatlands and restoring semi-natural grasslands on post-agricultural land.* (P33) Many of these aspirations are already being pursued in certain designated areas and it is important that the Welsh Government should be fully aware of the moorland management plans as they stand before continuing with the alternative energy proposals.

## **Landscape and Visual Impact**

The document states that *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.* (P 37) It is not at all clear how this came about and what the criteria that were used and also whether, as also stated, there is an acceptance of landscape change in the PAs for Solar and Wind energy.

It is most important that the micro siting of proposals must minimise the landscape and visual impact, not only close to built-up areas but also near key

upland tourist attractions in mid Wales. Tourism is very important to these areas where there is little other employment. Country activities such as hiking and rambling as well as sports such as beagling, fishing and shooting attract many visitors to the upland areas. It is vital that these proposed renewable energy projects do not detract from these increasingly popular tourist attractions and the employment they bring to the area.

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