

From: [Kevin Barnett](#)
To: [NDE](#)
Subject: Draft national development framework consultation.
Date: 10 October 2019 00:43:00

I am writing to you about the draft National Development Framework (NDF) that you are currently consulting on.

The majority of the proposed policies seem sensible and need little further comment, but four policies in particular are very concerning:

Policy 10 – Wind and Solar Energy in Priority Areas

Policy 11 – Wind and Solar Energy Outside of Priority Areas

Policy 12 – Wind and Solar Energy in National Parks and Areas of Outstanding Natural Beauty

Policy 13 – Other Renewable Energy Developments

Policies 10 and 11 cover large scale, on-shore wind and solar power, using wind turbines of up to 250 m in height. A section of central Anglesey has been selected to be a “Priority Area” where there is a presumption that developments will be allowed. I accept that smaller turbines may be proposed, but to achieve the generation potential, significantly more will be required.

The Welsh Government is right to focus on renewables, and to set targets for generation from these low carbon sources. An offshore wind-farm of the size of Hornsea, off Hull, could supply 70% of Welsh energy demands, including for widespread uptake of electric vehicles and decarbonised heating.

However, I do have the following concerns:

1 - There is no overall economic or energy policy covering all forms of power generation available to the Welsh Government! The proposed developments appear to be trying to meet the whole of Wales efforts to address climate change using only onshore wind and solar, ignoring things like offshore wind, tidal, biomass or nuclear(Policy 10, 11, 12, 13)

2 - The selection of the area to be designated as Priority Area 1 appears to be based on lots of analysis, but the final area seems to have been made up and the explanation in the consultants’ report is poor (Policy 10)

3 - The impact on the landscape of Anglesey will be dramatic, turning a low, undulating, agricultural landscape into a “pin cushion” of wind turbines. The impact on the setting of the Anglesey Area of Outstanding Natural Beauty, as well as Snowdonia National Park, will be devastating (Policy 10, 11, 12)

4 - The economic impact of landscape change will result in an “energy zone” of high land values and devalued homes which will not help social issues (Policy 10, 11)

5 - The protective measures of the planning process are vague and could be interpreted to provide no protection at all (Policy 10, 11)

6 - The scale and type of generating technology, particularly 250 m high wind turbines over a quarter of the island, is simply not appropriate for an island rarely more than 100 m above sea level (Policy 10, 11)

7 - The Welsh Government’s consultation on this framework has been dreadful, repeating all the mistakes of Westminster policy makers. Wales can, and should, do better. (All policies)

Please think again, rework your maps, and carry out a proper consultation, if you really want to involve the public in policy making! We don't want onshore wind developments of this size on Anglesey when there are other renewable generation options available. The policy on district heating is a good one though.

Many thanks

Kevin Barnett.