

From: [dominic costa](#)
To: [NDE](#)
Subject: Further Response to Consultation for the draft NDF of the WG
Date: 10 November 2019 14:31:24

Dear Madam/Sir

I have completed and submitted my initial response by completing your relevant official form and have had it confirmed and officially accepted. I would now like to add free text comments on the draft NDF and wish these to be addenda to the submitted form's content. Please would you be kind enough to email me by return that this is the case and these additional comments will be taken into account

1.

I wish to express my opposition again to the 3 region division of Wales in the dNDF. Professionals at Cardiff University have suggested a 4 region configuration. The drop in session civil servants in Newtown (Victoria Davies and Stuart Ingram) had suggested the 3 region solution was the fault of Ken Skates as his Economic Action Plan had called for this despite professional and academic opposition. I agree with Cardiff Uni as the reason for linking Mid Wales with Swansea is nonsensical and only confirms that all the funding will follow the south and rural mid Wales will suffer yet again (as we say in Powys " here be nothing " as far as the WG is concerned.

The 3 region plan must be withdrawn and the 4 region plan implemented

2.

The new emphasis on regional plans bodes ill for county councils(CC) from where Local Development plans originate. This dovetails into the dNDF suggestions that all renewable energy schemes of > 10 MW will be decided by the WG irrespective of what local community and CCs have voted for. This 10MW is anything greater than 3 wind turbines(WT) . This is unacceptable and is contrary to what happens in England, where we would say Devolution in Wales should make us more democratic not less. The Local Development plans (LDPs) that we have painstakingly constructed in Powys cannot and must not be thrown into the dustbins of history. The so-called priority areas(Pas) of ARUP's appalling mathematics must be dismantled with more rigorous scientific analysis ---- learning something from AECOM's mistakes – and be resubmitted along with the suggestion in para.3 below. In this resubmission the local CCs and communities must be involved in the decision making.

3.

The dNDF plans based on appalling ARUP misconceptions to carpet 20 % of rural Wales with WT and solar panels without an analysis of energy generation and consumption is unacceptable. We need concurrent analyses of reduction in consumption (not bigger airports) and increase in recycling , analysis of projected renewable energy (RE) capacity and targets and Welsh home vs export. This would include analysis of grid distribution before willy-nilly building endless onshore RE units. Our drop in session told us solar roof panels come under building control, offshore wind comes under Maritime law and large fossil fuel and nuclear units are not devolved and we told them this was infantile and impossibly small minded for a national government as the WG considers itself. Pages 36 to 43 inclusive of the dNDF must be withdrawn and taken away and be reconstructed with scientific and fully national analyses and resubmitted at a later date for consultation.

With many thanks

Yours faithfully

Dominic Costa

[Redacted signature block]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]