

From: [Martyn Cash](#)
To: [NDE](#)
Subject: Response to draft NDF
Date: 11 November 2019 09:51:32
Attachments: [National development framework.docx](#)

Hello WG,

Please find attached in word format my personal response to the draft NDF.

I would be grateful if you would confirm your receipt of my response.

Thank you.

Mr M Cash

Response to the Draft National Development Framework.

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 benefitted 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 wellbeing of people living in Welsh communities at the heart of any proposals.

Yours sincerely,

[Redacted]

Martyn Cash

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Date: 11 November 2019