

**From:** [REDACTED]  
**To:** [NDE](#)  
**Subject:** dNDF response Kristine Moore read receipt attached  
**Date:** 15 November 2019 09:02:54  
**Attachments:** [2019\\_10\\_13 Kristine Moore response to NDF.docx](#)

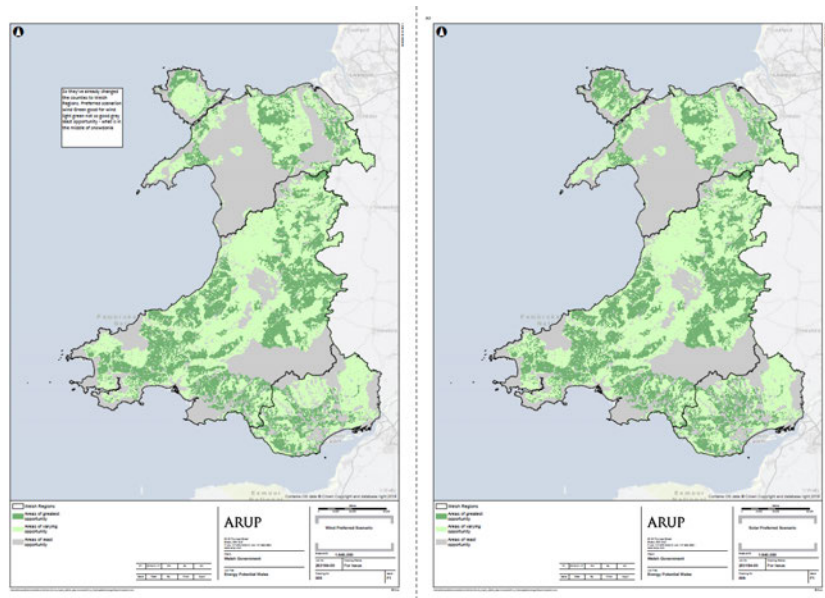
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Please find attached.

Kristine Moore,

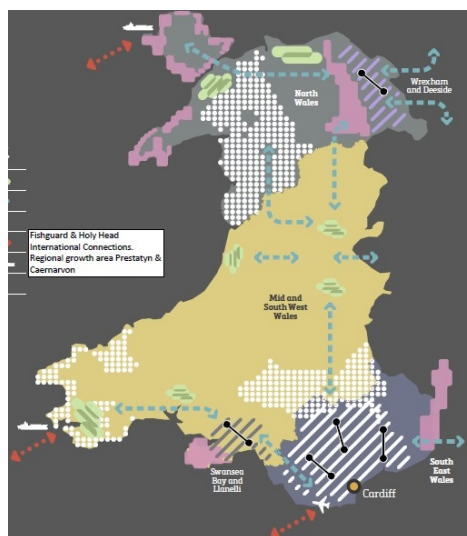
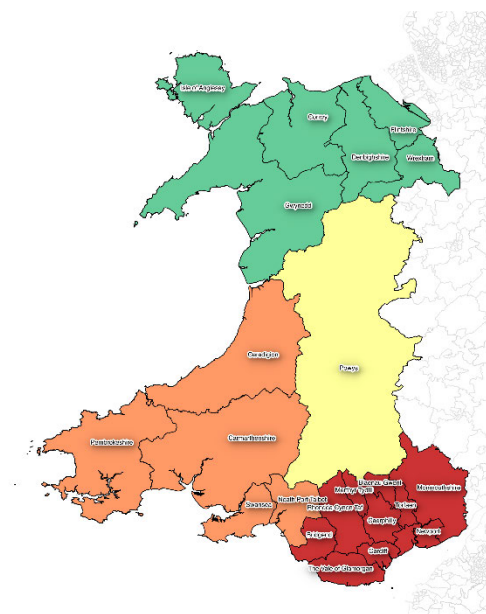
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It would seem that, in their haste to get the documents out, many mistakes have been left unattended and finding the documents and sometimes reading the 180 pages of them is onerous. See below two maps showing preference for solar PV and wind-power they seem remarkably similar. I am sure others were raised the detail of the mistakes in the Arup documents. Does the sun shine and the wind blow in very similar locations?



### South & Mid West Wales Region - Democratic deficit

The Welsh government seems to be a government of the people, by the government, for the government & the renewables industry. I fail to understand why this, still democratically in deficit, regions proposed by Cardiff University were “refined” to produce the three regions that look like some childhood geography project with Disney icons. There is no infrastructure to support this “region”. It is an absurd, and presumably desk based approach, to justify the imposition of a further layer of bureaucracy in a country that is oppressed by, many, many bureaucratic layers.



Mark Drakeford says in his introduction to the NDF “A great deal of collaboration from **stakeholders and communities** across Wales has gone into the preparation of this document and I am grateful for your continued support. The consultation on this draft National Development Framework is open until 1st November and I encourage you to get involved”. It appears evident that stakeholders who have been stakeholders are set to profit massively from the industrialisation of the hills of Wales.

From the NDP consultation document. “Strategic and Local Development Plans must support the implementation of the NDF, and the strategic decisions they take must conform with the direction provided by the NDF”.

BUT in **The Young Person’s Guide**. – The National Development Framework helps councils and others make sure their plans fit together and help us reach our goals. It doesn’t replace local plans. It doesn’t replace regional planning. It works with other laws and policies across Wales

I am trying, with difficulty, to reconcile these statements but now realise that the “our” = WG and not Wales.

## Renewable energy and emissions

**Headline: The US used more electricity for air-conditioning each year than the UK uses in total. If saving the planet is what the NDF is setting out to do perhaps the WG should think about going to talk to President Trump.**

- i) Stakeholders I was appalled to see in the Arup documents:- Stakeholders included representatives of local planning authorities, distribution network operators, transmission operators, national parks and NRW (National RESOURCES Wales an organisation converted from the purpose of conserve thing the natural environment to that of being “the justifier” for everything the Welsh government wants to do with the natural environment). Perhaps co-conspirators would be a better expression but then you don’t need to conspire when everyone in the room agrees and so the people of Wales don’t count as stakeholders.
- ii) Excess Electricity. From “The Future Potential for Offshore Wind Nov 2018 produced for the Welsh Government “Electricity consumption in Wales has mirrored the rest of the UK, with a 12% reduction observed between 2006 and 2016. However, generation trends have differed considerably, increasing 19% over the same period as Wales established itself as a key exporter of electricity to the GB grid. For example, in 2016 Wales transferred 43% of its generation to England whilst importing just 2% from the Republic of Ireland”. How can the NDF NOT include a discussion of offshore wind electricity generation. But then it does not contain any discussion of issues such as health education transport and infrastructure is so this is simply a presentation of the way the Welsh government wants to help the windfarm developers. We already produce more electricity that we need so the Welsh Government is prepare to devastate much of the landscape of Wales, and the tourism that goes with it, and its biological diversity (or what little remains of it) so that we can export electricity to England. We will replace the mines of the South Wales Valleys with the scarred hills of Wales, peat replaced by concrete, and structures that destroy a much wildlife. And turbines that will add and to the waste problem that is turbine wrote a disposal already a significant problem.
- iii) The dearth of evidence. In trying to produce more electricity than we need there is little or no discussion of existing installations and their efficiencies, no “open” discussion of transmission and grid connections and little comment on how these installations will relate to our “decarbonisation” or emissions targets.
- iv) Favouring and wind and solar. In favouring wind and solar absolutely no reference is made to the materials that need to be mined to create wind turbines and solar panels. The Welsh government says in the NDF that “We are committed to living within our means using only our share of the planet’s resources and using them efficiently” I would suggest that if any of these proposals with regard to renewable energy were carried out we would be using considerably more than our share of the planet resources, but don’t let the facts spoil a good bit of poetry.
- v) Quantitation. There is little arithmetic and less quantitation in this “Plan”. The quantitation should be the point of departure and not an afterthought.
- vi) Landfill emissions. I do not see any mention of what must be significant emissions from a landfill sites. In 2017 Wales was allegedly quoted as the second best recycling nation in the world <https://www.theguardian.com/environment/2017/dec/11/wales-household-waste-recycling-england> If the Welsh government popped out of Cardiff for any length of time they would realise that the figures for recycling are based on the simple calculation of waste that goes to landfill verses waste that is “recycled”. There is the third element to this prevalent in mid Wales of “fly tipping” and burning of waste. Of course there is no quantitation of this development but you do not have to go far down the river Severn to find the various nappies and un-recyclables littering the banks of our rivers. I see little or no mention of burning waste to make electricity and heat.
- vii) The airports and air travel expansion. The inconvenient truth. Of course, this is yet another elephant in the room in the case of emissions. Not only the aviation fuel burned at high altitudes but the condensation trails which criss cross Wales. Water is a powerful, condensable, greenhouse glass house gas. Of quantitation of the effects of the contrails on “the greenhouse effect” is only just beginning and of course this is a thorn in the side of the planned for growth where tourism is thought globally to represent 10 per

cent of GDP world wide . Yet the Welsh government ceaselessly promotes Cardiff Airport, surely a significant source of our emissions.

### **The case of the “Arup documents”**

Surely Brecon & Radnor CPRW should be awarded a group PhD for their exposure of the methodological “problems” of the Arup documents and their association (or rather perhaps failure to associate) with the various documents on “sustainability”. I won’t go into them here because it would almost be guaranteed” to be a dialogue of the deaf.

- i) There could be pages spent examining the various Arup documents that surround the NDF and I’m sure many people will give detailed descriptions of the methodological deficiencies of these documents. Life is too short to go through the various manipulations and hoops that Arup have covered to cover ~25% at least of Powys in wind “farms” and solar “farms”. The Welsh government insisting its jurisdiction act greater than 10 Megawatts has ensured that for a feeble amount of electricity produced the Welsh government will have the say about where a windfarm will go. This is totally undemocratic and is seen as such by most of the people outside the Cardiff and Swansea bubbles. It effectively says “let’s get rid of all the pesky checks and balances nonsense”.
- ii) Perhaps the Welsh government thought it could get away without some sort of quantitation exercise so it chose not to do it in power but to do it in its own “spatial way”. Fortunately people that realised quite early on that there was some access to these documents which are key. The Welsh government seems to say to paraphrase Ken Follet, a proud Welshman, in his book about “The Anarchy” said “rest assured whatever is writ today can be scrapped tomorrow”.

### **The Integrated Sustainability (ISA) Report, where to begin?**

They lost me with “could & may” and you will have many comments on the inadequacy of this document.

In closing I will be asking for on FOI on all the documents/report and staff time that have contributed to this farcical NDF. I would suggest that it would all have been better spent on:

- i) promoting energy efficiency, stopping supermarkets using 1% of electricity to produce freezing cold aisles of chilled & frozen foods
- ii) solar PV on every public building (South + East & West facing),
- iii) promoting EDF incinerators (we live not far from the fungating mass that is Bryn Posteg Landfill site) and would rather live next to an incinerator
- iv) and ensuring that Wylfa Newydd could progress, with undergrounding of transmission lines, and employ many more people that wind & solar development