

From: [Clare Moseley](#)
To: [NDE](#)
Subject: consultation response (objection)
Date: 15 November 2019 14:28:19

Dear Sir or Madam

I wish to object to the draft National Development Framework, as I do not believe it takes account of the latest scientific consensus regarding biodiversity and climate change.

The following evidence, which was published this year, before this consultation opened, should have been taken into account when it comes to proposed changes in use of land, but does not appear to have been considered, as demonstrated by the suggestion of the proposed expansion of onshore wind and solar in the countryside in Wales outside of the existing TAN 8 areas: <https://www.ipbes.net/global-assessment-report-biodiversity-ecosystem-services>. As pointed out in this news article about the report, <https://www.bbc.co.uk/news/science-environment-48169783>, the primary driver of species extinction is **change of land use**, and within the prioritised list of proximate drivers of biodiversity decline, climate change is only number three. Furthermore <https://www.ipcc.ch/report/srccl/> details the importance - from a climate change perspective - of not abusing land (see also <https://www.bbc.co.uk/news/science-environment-49149761> for a short introduction to some of that report's implications).

Furthermore I do not believe the material around HRA provided with the draft National Development Framework is sufficiently granular to justify a presumption in favour of such developments in the areas shown. For example, area 14, especially if considered in the context of existing sites in the TAN 8 area, would be in danger of negatively impacting migratory, or other, bird passage between the sea, the RSPB Cwm Clydach bird reserve and surrounding farmland, and the Wildfowl and Wetland Centre in Llanelli (e.g. those passing over Tor Clawdd). I welcome the proposal of buffer zones, but believe the need to have them is in itself a justification for revisiting whether a presumption in favour of developers is wise, and also question whether all the necessary protected designations and sites have been captured in the documents accompanying the consultation.

When it comes to the matter of landscape change, I believe appropriately sited trees would be preferable from both a residential and tourism perspective, rather than developments of an industrial character, such as onshore wind, and I think some residents and business owners would feel they had been misled by any expansion of TAN 8. However, personally speaking, given the international scientific concerns about the impacts of change in land use, and my personal desire to support biodiversity, I would suggest that making the installation of solar panels (hot water heating or PV) on roofs much easier, and encouraged, should happen, rather than installing them in fields or increasing the number of onshore turbines (which I oppose, not least owing to the roads and deep concrete foundations that accompany them). The buildings in the Swansea Enterprise Park in Llansamlet would be an ideal location for solar installations on roofs, for example.

One further point about onshore wind and solar panels is that there needs to be a presumption against them if SF6 is used in them or used in their manufacture. See: <https://www.bbc.co.uk/news/science-environment-49567197> There is a need perhaps for a new standards body to police the renewables energy industry? Likewise, given the proposal to plant many more trees across Wales, we need to train more people to manage them and to educate everyone in good fire safety and biosecurity practices.

Yours faithfully

C Moseley