

From: [Paul Madden](#)
To: [NDE](#)
Subject: Response to NDF Consultation - There is no Wales B
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Attachments: [NDFPaulMaddenResponse141119.pdf](#)

To the Welsh Government/NDF Unit

Please find attached my brief response to Policies 10,11,12,13 and 22, as outlined in the Draft NDF Consultation. Energy underpins all other matters, so frankly I haven't addressed any other policies in the NDF.

I should add that it concerns me greatly that these Policies are ill-thought out, and not fit for purpose. Consequently I can't say I have any confidence that the rest of the policies in the draft NDF are sound.

Yours sincerely

Paul Madden

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WELSH GOVERNMENT DRAFT NATIONAL DEVELOPMENT FRAMEWORK (NDF)

2020 -2040

Policies 10, 11, 12, 13 and 22

A response by Paul Madden

THERE IS NO ~~PLANET~~ WALES B

Beware of the Blobs



Extract from: The Bright Field by RS Thomas

"I have seen the sun break through
to illuminate a small field for a while, and gone my way
and forgotten it. But that was the pearl
of great price, the one field that had
the treasure in it."

You couldn't make it up, but the Welsh Government has.

It plans "70 per cent of electricity consumption to be generated from renewable energy by 2030", but why 70% ? And 70% of what consumption? The draft NDF doesn't give you a clue, no back-up figures are provided, no evidence adduced.

It wants to cover a fifth of Wales' precious landscapes in wind turbines and solar farms, and here in Môn Mam Cymru, Anglesey, over a third of this small island. "Our landscapes are amongst the best in the world" boasts the NDF. Not for much longer, if the Welsh Government gets its way.

What the Industrial Revolution didn't despoil and destroy, the Welsh Government are determined it will, and finish the job. A Welsh Government spokesperson said "We have a responsibility to respond to the climate emergency and plan for our national energy needs." (*Daily Post 2 Oct 2019*) and according to Planning Policy Wales, everyone else's needs too.

So crude blobs, indicating 15 priority areas for large scale wind and solar developments, have been stuck on a map of Wales, blobs with the capacity to destroy lives, livelihoods and well-being, but not the capacity to provide a consistent source of electricity. Apparently a virtually carbon-free wonderland is to be achieved with onshore wind and solar only. No other form of power generation gets a look in. And the "evidence" adduced here in support is a couple of inadequate and flawed studies from desk bored consultants, working to a brief set by the Welsh Government, although neither are mentioned in the draft NDF itself. No attempt whatsoever is made to set onshore wind and solar within the context of a coherent energy policy and strategy. And yet the NDF is to be the highest tier of planning in Wales.

Nuclear gets a brief and sniffy mention in Policy 22 in regard to potential economic benefits. No mention of the potential of new nuclear, for instance Small Modular Reactors (SMRs), including Molten Salt Reactors (MSRs) which will be a transformative and cost effective low carbon energy generator. Even so, says the NDF, the economic benefits of nuclear "will need to be balanced against the long-term impact these large-scale [nuclear] developments can have on sensitive areas and the surrounding environment."

Really? Large scale? Not all nuclear developments need be large scale - the NDF's previous paragraph refers to a Small Modular Reactor, the clue is in the name. Such nuclear technology can be the size of a lorry. And anyway for the amount of consistent, abundant electricity it produces so-called large scale nuclear takes up little land mass compared to the acres upon acres eaten up by large scale wind and solar farms, dependent for their output on whether the wind blows or the sun shines.

No recognition in the NDF of the impact large scale wind and solar developments "can have on sensitive areas and the surrounding environment", merely the sop of "maximising benefits and minimising impacts". It's quite difficult to miss giant 250 metre high wind turbines planted in what was otherwise tranquil landscapes. Short of having no such turbines at all, it takes a mighty leap of the imagination to envisage how impacts can be

minimised. As for “maximising benefits”, in the real world benefits are maximised to the developers and not to the wider community.

Ah! But the NDF assures us “Communities will be protected from significant cumulative impacts to avoid unacceptable situations whereby, for example, smaller settlements could be potentially surrounded by large wind schemes.” Never mind that “The development of Priority Areas will assist in co-ordinating strategic action, bringing a critical mass of new renewables developments together to build the case for new or reinforced grid infrastructure.” More pylons, substations, miles of cables, anyone? More industrialisation of landscapes.

A Government worthy of the name has a responsibility for the well-being of its citizens. The Welsh Government went so far as to articulate that in its very own *Well-being of Future Generations (Wales) Act 2015*, but is happy it seems to dump its obligations by dumping wind and solar developments across Wales. Responding to the so-called climate emergency trumps everything.

We must appear to do something runs the mantra, even if it’s the wrong thing. A Welsh Government spokesman states “The framework designates priority areas where large-scale wind and solar development will be acceptable in principle.” (*Daily Post* 2 Oct 2019) We, the Welsh Government, according to the NDF, are happy to accept the inevitable “landscape change” that follows, whatever the impacts on or consequences for local communities. This is the like it or lump it approach to Planning.

There’s no mention of the likely effects, for instance, on local economies of large scale renewable projects. Economic impacts are not listed as one of the “unacceptable adverse effects.” In the case of Anglesey, for instance, the effects on its tourist economy could be devastating.

But hark! words of comfort from that same WG spokesman “Any schemes must still go through the normal planning application process.” The normal planning process in the NDF is now defined as the Welsh Government grabbing to itself decisions on all renewable energy generation developments, classed as “Developments of National Significance”, over 10MW. Some comfort and so much for local democracy. In contrast across the border in England communities can still have a say on the development of their local area and their local authorities can decide renewable energy planning applications up to 50MW.

No surprise there then, all part of the Welsh Government’s top-down centralist and fundamentally anti-democratic approach – take devolved powers from the UK Government and grab powers from its own local authorities and communities.

Landscape is the very fabric of a nation, none more so than in Wales, from which springs its unique culture and heritage, a source of wonder and joy to its citizens and its visitors. There is indeed an emergency, but in Wales it’s a **landscape emergency**, which the Welsh Government will bring about by its damaging proposals for large scale wind and solar

developments to be spread across the length and breadth of the land, come what may. The only welcome in the hillside will be from giant wind turbines, but since no-one will want to come, no welcome will be necessary.

These policies represent a truly shoddy piece of work, ill-thought out and poorly conceived. Far from looking forward to the future, 2020-2040, they are backward in not seriously considering those new technologies in the pipeline, which will transform energy generation in the lifetime of the framework.

I have heard various epithets bandied about to describe these policies from members of the public and from those who serve on public bodies, such as “mad”, “outrageous” and “ludicrous”, besides some that are unprintable.

These policies should be withdrawn and new policies drawn up within the context of an inclusive approach that recognises the part Welsh citizens can play in shaping the Wales of the future and the land they love.

Paul Madden

Anglesey 14 November 2019.