

Draft National Development Framework

1. NDF Outcomes (chapter 3)

Q1. The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time. Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Disagree

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with some of them

If you disagree with any of the 11 Outcomes, please tell us why:

I strongly disagree with Outcome 11. To designate around 20% of the Welsh Landscape to large scale renewable energy development will have a huge negative impact upon tourism which generates around £6.3 billion for the Welsh economy; upon the mental health and well being of rural communities which will have to adapt from living in unspoilt rural landscapes to industrialised dispersed wind or solar farms; to the health and wellbeing of birds as the number of turbines that could result from this appallingly damaging policy has to affect them. I think the WAG has truly lost the plot and have become misguided green zealots trying to be seen to be going green without fully understanding the major adverse impacts of their actions. This Outcome has not been thought through it clearly conflicts with several of the other Outcomes given. As a rural resident that has been subjected to uncontrolled renewable energy development in my area I can tell you first hand that it is an extremely depressing experience to see your beautiful unspoilt landscape completely ruined by wind turbines and solar parks. It has had a detrimental impact upon my mental well being and also that of my neighbours in the vicinity. There has not been any social or economic benefits for any one I know of in the area just tears, anxiety, stress and great sadness. I suspect Ministers in favour of such schemes and members of the public live in towns or urban areas. If a wind turbine the size of Big Ben was erected at the end of everyone's road there would be an outcry. If all parks and green areas were covered in solar panels residents would be enraged. In the countryside however it is deemed to be acceptable. As for measures put in place to protect communities from such development it is rubbish, all empty rhetoric. Our community had to stand by and watch the legal planning process ripped up and thrown away with regards to renewable energy development. We the residents and our historic unspoilt landscape counted for absolutely nothing in the process. Instead of this appalling destruction of our countryside measures should be implemented and subsidised in ways that people can directly benefit from and reduce carbon emissions. 1. Reduce demand 2. Retrofit existing homes with energy efficient products. 3. Incorporate energy efficiency into the fabric of new builds. E.g. Passive House Homes are virtually carbon neutral they are ultra low energy buildings that can produce a 90% home energy reduction. 4. Solar panel use. 5. Encourage large scale tree planting by residential homes and businesses as trees are carbon sinks absorbing carbon dioxide with the added benefits for wildlife. Such measures would result in real monetary reductions in energy bills and usage whereby the present system of renewable energy subsidies push up bills for people forcing some into fuel poverty. The UK Energy Research Centre (UKerc) reported that the poorest households spend 10% of their income on heating and lighting compared to just 3% for the richest. Renewable energy costs more so this drive toward more random not targeted renewable energy use will only exacerbate this situation. Outcome 11 is therefore clearly in conflict with Mark Drakeford's statement that he wants to make Wales a "fair, green and prosperous place" what it will do will make the poor poorer, destroy our green and pleasant land, reduce property values and destroy tourism.

2. Spatial Strategy (policies 1 - 4)

Q3. The NDF spatial strategy is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years. To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)	X						
Rural areas (Policy 4)				X			

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

In the main I agree with the objectives of Policy 4 with regard to giving priority to the activities mentioned with the exception of energy generation. Historically energy generation has never had a "strong link" to rural areas. It is a diversification activity that is relatively new and one that can have major adverse impacts upon the countryside and its inhabitants. It can in no way be considered part of the rural fabric.

3. Affordable Housing (policy 5)

Q5. The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes. To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

No Response

4. Mobile Action Zones (policy 6)

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Neither agree nor disagree

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

No Response

5. Low Emission Vehicles (policy 7)

Q9. To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Neither agree nor disagree

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

No Response

6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree

7. Renewable Energy and District Heat Networks (policies 10-15)

Q12. To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and solar developments					X		
District heat networks			X				

Q13. If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

I believe the creation of the Priority Areas for wind and solar will have a catastrophic adverse impact upon the landscape of Wales, wildlife especially birds, the Welsh tourist industry and the mental and physical well being of residents living within these areas. To destroy so much in the pursuit of decarbonisation when in reality this destruction will have little impact upon global warming is misguided. There are other ways that would be more effective such as reducing use at source by retrofitting insulation measures in all homes, solar panels on appropriate roofs, ensuring new homes are built using materials which will greatly reduce energy use. All these measures would also mean a real reduction in the cost of energy for people instead of them having to pay more in their energy bills to pay for the subsidies paid to wind turbine and solar parks. The majority who are owned by large companies many foreign owned and very rich individuals, when our poor and elderly are pushed further into fuel poverty forced to choose fuel or food.

Wind turbines and solar parks may have a part to play but only a part and should only be situated in industrialised areas or along motorways where there has already been development in the countryside.

Hydro power should be further explored. There are going to be huge problems with balancing the National Grid with the increase in wind and turbine hydro power would also be much easier to control.

I am also extremely concerned at what I see as the misuse of the planning system in driving renewable energy. The taking away of local democracy, the voice of those affected. The planning system is legislation designed to control development and to balance the interest of all parties. It was not created to be used as a tool to tackle global warming. There is appropriate expertise and legislation outside the planning system that are better placed to carry out this function.

With regard to local communities benefitting from such development it is a fallacy as is the concept of local ownership. Local communities cannot afford to build wind farms and solar parks indeed it is highly unlikely they would be able to afford one turbine. Renewable energy companies built wind farms and solar parks to make money for themselves not for altruistic reasons or to save the world. The consumer pays when the wind blows and bizarrely even more if the turbines are turned off. They are simply grossly inefficient money spinning schemes.

8. The Regions (policy 16)

Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale? The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

Disagree

9. North Wales (policies 17-22)

Q15. We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale. To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Neither agree nor disagree

10. Mid and South West Wales (policies 23-26)

Q16. Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro. To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Neither agree nor disagree

11. South East Wales (policies 27-33)

Q17. In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport. To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Neither agree nor disagree

Q18. If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

It sounds a sensible policy however I am concerned that it will impact upon local democracy and that attention will be focused more upon Cardiff and Newport with the needs of other small towns becoming secondary and subservient to the Cardiff and Newport centric thinking.

12. Integrated Sustainability Appraisal

Q19. As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development. Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

" Some policies, such as P10, include a requirement for measures to minimise adverse impacts on the local character. This implies that for some of the proposed land-uses in the NDF will be visually prominent and impacts on local character would to some extent be accepted."

I believe that the above demonstrates the down playing of the potentially monumental adverse impacts of aspects of Policy 10 will have upon the landscape. You cannot minimise the adverse impacts of large scale wind farms and solar parks.

There should have been a full appraisal of the possible adverse impacts upon not only the landscape but wildlife especially birds, tourism and the mental and physical health and well being of residents both living in small communities and individual homes within these areas.

13. Habitats Regulations Assessment

Q20. As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds. Do you have any comments on the Habitats Regulations Assessment report?

After reading the Assessment report the overriding opinion I have formed is that in truth due to the transient behaviour of birds and bats the extent of the potential harm that could be inflicted by these renewable development proposals cannot be evaluated. Despite a report 44 pages long, the conclusion is that proposed Policy P10 along with eight further policies "all relate to the types of development that typically have a higher likelihood of leading to adverse effects on Natura 2000/Ramsar sites. This is because of the size and scale of the developments (energy & port -related activities) and because they tend to be more likely to be located away from existing urban areas, and /or on the coast where the risk of conflicting with European sites designated for nature conservation is higher"

The final conclusion of the report is candid in that it admits that "this report has made clear that it is difficult at this very high-level stage of the development planning process in Wales to be clear about how European designated sites may or may not be affected by strategic policy decisions"

Furthermore the Habitat Regulations Assessment Appendix B confirms that "both bats and birds are highly mobile and are also known to be susceptible to turbine related injury or mortality" also that "89 species of soaring birds are known to be sensitive to collision with wind turbines".

There is no Wildlife Sensitivity Mapping tool available in Wales that would assist in providing comprehensive and more robust information and the author to the report admits that due to the absence of a WSM tool the judgements given have not been developed on the basis of a comprehensive analysis of literature but on standard information adopted by the consultancy industry and professional judgement.

Birds and bats do not recognise "buffer zones". It is noted in the Habitat Regulations Assessment Appendix B that "birds associated with a designated site are certainly not confined to the boundaries of that location and will often fly some distance from it to feed, roost or breed"

Both the Habitat Regulations Assessment Report and Appendix B Report are peppered with words and phrases such as "should ensure", "likely to be less" "impacts likely to be small", considered highly unlikely", "are anticipated". All of which cannot only lead to the conclusion that the true extent to which birds and bats and other wildlife will be affected is unknown.

The HRA report admits that despite the P13 policy mitigation measure that "Proposals should ensure that there is no significant unacceptable detrimental impact on the surrounding natural environment" it cannot be relied upon at this stage to ensure "beyond reasonable scientific doubt" that adverse effects on Natura 2000/Ramsar sites can be ruled out.

Of further concern is that there appears to be no evidence of a coherent strategy for the protection of migratory and dispersed bird species and bats in the wider landscape outside of protected areas.

I believe therefore that the proposed wind and solar energy proposals have great potential for causing catastrophic harm to birds and bats and can see no substantial evidence in the above reports that proves otherwise.

14. Welsh Language

Q21. We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Comment

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Comment

15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

There are several good initiatives within the NDF however the renewable energy proposals creating the new Priority Areas are in my opinion misguided and will cause major adverse impacts upon the landscape and wildlife. Furthermore there appears to be no account taken of the impact of the renewable energy proposals upon the Welsh tourist industry which contributes around £6.2 billion to the Welsh GDP and employs around 172000 people. The extent of these proposals potentially could change visitors perceptions that Wales is primarily a dispersed renewable energy park.

The proposals take away local democracy. Communities affected by these proposals will have no means of raising objections. Quite to the contrary in England local communities concerns have to be addressed by the developer otherwise the proposed development is refused. Strong voice in England no voice in Wales.

Global warming needs to be addressed but to spoil 20% of the Welsh landscape which will globally have zero impact upon the world as Wales is just 0.08% of the world population seems to be insane.

16. Are you...?

Q24. Are you:

Providing your own personal response

Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name

[REDACTED]

Organisation (if applicable)

-

Preferred contact details (email/phone/post)

[REDACTED]

Q26. If you want to receive a receipt of your response, please provide an email address.
Email address

[REDACTED]

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous