

Feedback on draft National Development Framework

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Thank you for the opportunity to respond to the draft National Development Framework¹ (NDF). It is certainly a bold and ambitious picture of how Wales might develop over the next twenty years.

Many of the policies presented I agree with, so I will focus my comments on those where I think there is room for improvement. These are:

- Policy 10 – Wind and Solar Energy in Priority Areas;
- Policy 11 – Wind and Solar Energy Outside of Priority Areas;
- Policy 12 – Wind and Solar Energy in National Parks and Areas of Outstanding Natural Beauty (AONB);
- Policy 13 – Other Renewable Energy Developments;
- Policy 14 – Priority Areas for District Heat Network;
- Policy 15 – Masterplanning for District Heat Networks;
- Policy 22 – North West Wales and Energy.

Policies 10, 11, 12, 13, 14 & 15 all deal with renewable energy. I agree with having policies covering renewables, but do have the following issues:

- There is no inclusion of offshore wind, tidal reach or tidal stream. These are included in the draft National Marine Plan (NMP), but it strikes me as totally illogical to separate renewables into two separate strategies. It appears that these have been developed in silos, which means they cannot be optimised
- The level of generation potential is simply alarming - from onshore wind and solar in the 15 Priority Areas there is the potential to generate 1/3 of the UK's demand! With the generation offshore in the NMP, and nuclear in policy 22, Wales will be generating almost 50% of UK demand. I cannot believe this is intended
- This level of generation does not align with many estimates of the growth of renewables, including:
 - "Thirty recommendations by 2030"² prepared for the Labour Party
 - "Re-energising Wales"³ by the Institute for Welsh Affairs

¹ <https://gov.wales/sites/default/files/consultations/2019-08/Draft%20National%20Development%20Framework.pdf>

² <https://labour.org.uk/wp-content/uploads/2019/10/ThirtyBy2030report.pdf>

³ https://www.iwa.wales/wp-content/uploads/2019/03/IWA_Energy_WP6_Digital-2.pdf

- “Zero Carbon Britain”⁴ by the Centre for Alternative Technology
 - “Future Energy Scenarios 2019”⁵ by National Grid ESO.
- This level of generation will of course come with immense consequences to the Welsh countryside. On Anglesey the 65 square miles of solar parks and 250 m high wind turbines will have a devastating impact on the landscape, and visual and recreational amenity enjoyed by residents and visitors. Within the “energy zone” approx. 7,000 homes will be surrounded by solar parks and be no further than 750 m from a wind turbine
 - While this “new power economy” will certainly bring some economic benefits, it will also be detrimental to existing industries such as agriculture and tourism, and have a destabilising impact on land and property values. I suspect that the cost-benefit analysis has not followed the guidance in the Green Book, which I understand from HM Treasury it should do. If it has, I could not find the evidence in the background material
 - I note that planning guidance is promised to mitigate some adverse impacts, but is not yet available, so impossible to know whether the mitigation will be measured and appropriate

Given all these failings, I can only conclude that the renewable energy policies are not sufficiently mature in the current form, and should be removed from both the NDF and the NMP as they currently stand. The policies should be further developed as a single renewables strategy, complete with a package of mitigating measure and planning guidance, subjected to public scrutiny and involvement as a coherent whole, then spliced back into the NDF and NMP.

I hope you find these comments useful. While there definitely is an urgency to proceed with renewables, in the current immature form, with questionable cost-benefit analysis, the risk of subsequent challenge is, I believe, too great to not get this right.

⁴ <https://www.cat.org.uk/info-resources/zero-carbon-britain/research-reports/zero-carbon-rethinking-the-future/>

⁵ <http://fes.nationalgrid.com/fes-document/>