

From: [REDACTED]
To: [NDE](#)
Subject: Draft National Development Framework. Comments RG Woods
Date: 14 November 2019 11:05:52
Attachments: [Draft National Development Framework Consultation.doc](#)

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Please find attached my comments on the NDF. I am also forwarding by post a hard copy.

Yours sincerely

RG Woods

Draft National Development Framework Consultation

Comments made in a personal capacity by Mr. Raymond Woods, [REDACTED]
[REDACTED]

The above Development Framework Consultation is not fit for purpose and if adopted brings the whole carefully crafted planning process into disrepute.

It operates at too large and crude a scale to be the sole arbiter with respect to the detailed siting of such large scale developments as wind power stations.

Given that tourism is largely dependent on the quality of the landscape and it accounts for over 10% of Welsh domestic product (agriculture less than 1%) it is inexcusable to fail to take into account landscape quality and the capacity of the land to absorb developments in designating priority areas for solar and wind developments.

Whilst the coastal counties of Wales might still attract visitors to their beaches and sea cliffs even if the hinterland has large scale power developments, rural mid Wales is entirely dependent on the quality of its landscape to attract visitors. Areas 6 and 7 form part of a twice proposed Area of Outstanding Natural Beauty. At no time was the quality of this landscape questioned. Designation was not proceeded with because its western boundary would have abutted a Cambrian Mountains National Park and Government at the time chose to protect the latter area in a different way. It became the first Environmentally Sensitive Area. Such was the perceived importance of the proposed AONB that its entire area was quickly placed in another ESA-the Radnor ESA. Large sums of public money were spent to conserve these landscapes of outstanding importance. The continued quality of the landscape is recognised in the current local development plan. Areas 6 and 7 should be removed from consideration.

Whilst great emphasis has been placed on Natura 2000 sites for which I applaud you, Sites of Special Scientific Interest appear to have been ignored in the renewable energy development site selection process. Many of these sites are of no lesser significance. It should be remembered that the Natura 2000 site selection process is ongoing and incomplete. For example the importance of sites for fungi across Europe is in active assessment. Large parts of Mynydd Epynt (Priority Area 8) are now known to be of international importance for grassland fungi and will greatly limit the area that could be developed here. It is also difficult to see how a large part of area 7 could be developed without unacceptably affecting the hydrology of Rhosgoch Common National Nature Reserve that lies at its core.

I therefore ask you to **modify Policy 10** and **withdraw areas 6, 7 and 8** from consideration as priority areas for wind power development. The final paragraph attached to the policy provides no comfort whatsoever in view of the astonishing recent decision by the Minister to overturn the findings of a planning committee and a public inquiry and approve development of the Llandegley Wind Power Station.

Yours faithfully

Mr. R.G. Woods