

**From:** [Mark Williams](#)  
**To:** [NDE](#)  
**Subject:** National Development Framework Response  
**Date:** 11 November 2019 09:48:46  
**Attachments:** [Welsh NDF Response.pdf](#)

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Hello,

Having found the 'official' online response form very difficult to engage with, I have instead written my own response document which I trust will be taken seriously in the consultation process.

Kind regards – Mark Williams



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Mark Williams – Publisher/Editor/Journalist



**Personal Response to Draft National Development Framework by  
Mark Williams,**

**November 1<sup>st</sup> 2019**

- 1) **Damage to Local Democracy** The proposal to cede planning consent for renewable energy developments over 10 MW to the Welsh Government, ends local democracy from the planning process, and undermines our human rights in direct contravention of the provisions of the Wellbeing of Future Generations Act. Feelings of disempowerment in local communities will erode confidence in all forms of authority. Communities in England have the power to veto renewable energy projects in the Localism Act 2018. Why do we in Wales not have that?
- 2) **Ignoring the Powys LDP** Last year the Powys Local Development plan (LDP) went through an exhaustive public inquiry and the search areas for wind and solar developments was drastically reduced from the original draft LDP. The process identified that all of the areas suitable for wind energy developments had already been used and the remainder were constrained as they are designated sensitive environments by SSSI's, SAC, or SPA's etc. Solar search areas were drastically reduced by similar constraints. The arbitrary Priority Areas identified in the NDF proposals takes no account of any of the constraints contained in your own Renewable Energy Toolkit. Major decisions made by the Welsh Government on renewables will be made without any local knowledge or acknowledgement of community concerns and no opportunity for local authorities to consult with those most affected by these massive environmental changes.
- 3) **Threats to Tourism** It is a published fact that tourism is worth billions to the Welsh economy. In Mid-Wales the service sector is the biggest employer of young people and helps keep farming families together and retain their local roots. There is no recent government research into the effect of large renewable energy projects on tourism in Wales but tourism businesses in Powys have confirmed that a major attraction of Mid-Wales is the unspoilt nature of the locality and the peace and tranquillity of our landscapes, which confirms that visitors don't want to see large solar arrays or wind turbines on every hill. The scale of the Renewable Energy development in the NDF does not take into account the potential effect on tourism.
- 4) **Health and Wellbeing** Having personally visited several onshore windfarms I know that the noise they make including ultrasound, which can travel for several kilometres under various conditions, I am keenly aware of the damage this can do to the health of local residents, never mind wildlife. This appears not to concern the architects of the NDF proposals, which is a scandal.
- 5) **Severe Economic Damage** Claiming, as some have, that development of more wind and solar installations creates large "employment opportunities" is fallacious. During the construction phase some local people may be employed as security guards, labourers or drivers of machinery but even this is dubious as, for example, during the construction of the single (and still not operational) turbine at Hendy Wind Farm the security staff all came from far away, all the heavy plant was operated by the contractor's staff, (who are based in North

Wales) and the concrete for the base was delivered from places as far away as Huddersfield. The only local labour was employed, and temporarily, the owners of the land on which the turbine stands. There are no permanent, skilled jobs for local people once the turbines are installed and the maintenance is done by specialist teams from other areas. The so-called 'Community Benefit' schemes are not compulsory and token gestures of playgrounds or paltry sums offered are derisory. Therefore the local economy does not benefit from renewable energy installations, quite the reverse, the detrimental effect on tourism, and consequent loss of jobs will seriously harm the already fragile economy locally. In addition, an upward effect on energy prices is very likely due to the considerable government subsidies awarded to the developers and providers. This too, will harm consumers locally and nationally.

6) **Environmental/Ecological damage** It is plainly fallacious to claim that that building wind and solar installations does not cause environmental or ecological damage. Having personally seen the destruction and damage to the ecology at Llandegley Hendy Wind Farm during the construction of the first of seven turbines last winter I was outraged by the lack of concern exercised by National Resource Wales about the concrete slurry clearly seen entering the source of the river Edw during the construction of the base of turbine 5. Alarmed residents alerted NRW that there was concrete spilling into the watercourses from the construction site but no response was received to telephone calls or emails. Other environmental damage was caused by the removal of hedges and felling of trees to make an entrance without any planning permission. There is clearly not enough scrutiny to ensure the protection of sensitive landscapes once construction begins. At other operational wind farms in Wales the ground looks sterile and impoverished where the hard standings for the cranes were, massive wide tracks where no grass or wild flowers can grow, the trees have been removed and the wildlife gone and until there is proper research into the environmental and ecological effect of industrial wind and solar farms on the land, the people and the wildlife, all future developments should be suspended.

7) **National Grid Capacity** The plans for the NDF strongly suggest a misunderstanding of the realities of the National Grid. It is well known and accepted that in Powys that there is little or no capacity on the local grid infrastructure for added electricity generation. An example is the Bryn Blaen Wind Farm near Llangurig which was completed early last years and to date has produced no electricity for the grid. This is due to the local grid infrastructure not being robust enough. I understand from an officer in the Powys planning department that the Western Power Distribution has no plans to upgrade the grid infrastructure in south Powys. Of course the Welsh government isn't concerned with grid infrastructure because upgrading it would be a commercial decision made by the company that owns the National Grid. How can this be reconciled with the NDF which proposes a massive increase in electricity generation from renewable energy in an area where there is no grid capacity? As I believe that the nearest grid connection which would be robust enough to take increased power generation from South Powys would be Newport, Gwent. The consequent connecting power lines over that distance would constitute an expense that would not be economic or environmentally sound.

8) **TAN8 and Cumulative Impact** The arbitrary outlines of the Priority Areas in the extremely flawed maps provided don't address the issues of cumulative impact. There is no acknowledgement of existing wind and solar installations,

nor is there any reference to existing TAN8 areas. How can communities assess the impact of the proposals in the NDF without this information? Does the NDF remove TAN8 from legislation or is it in addition to TAN8? This is far from clear.

**9) Removal of RE Infrastructure** There is very little in the NDF's Renewable Energy policy about the removal of RE infrastructure. Removal of "above the ground" components can undoubtedly be achieved but it is clearly impossible to remove the enormous concrete and steel bases of wind turbines. Indeed the "re-powering" of the existing Llandinam wind farm near Newtown is an ecological disaster waiting to happen. Clearly the existing bases cannot support new turbines and therefore the inevitable outcome is a hillside riddled with massive lumps of concrete and steel, which will eventually become a source of pollution to the water table. In addition it is currently very difficult and expensive to recycle redundant fibre glass turbine blades, and there are few recycling facilities in the UK. Solar Panels contain many toxic chemicals some of which are not currently recycled. The Well Being of Future Generations Act's aim to protect the environment for our descendants is therefore clearly fallacious.

**10) Effects on Residential Property** From discussions with estate agents and indeed obvious evidence, residential property development near wind farms is simply unviable and prices of existing properties have become seriously diminished leading to negative equity which can devastate the lives of residents trying to sell their properties in order to escape the environmental and health issues detailed above.

## **Conclusions**

\* The NDF renewable energy policies are inconsistent with those of the Well Being of Future Generations Act.

\* The methodology of designating the Priority Areas for wind and solar energy is deeply flawed and ignores the recommendations in the Welsh Government's own 'Toolkit Guidance' for protection of the environment, ecology and biodiversity.

\* Issues of health and various other effects of wind farm (and solar) development on local rural communities has been ignored.

\* The centralising of planning control to the Welsh government removes local authority control and community engagement, and thus any semblance of local democracy.

\* The NDF ignores the importance of tourism to rural communities and the local economy.

\* There is no acknowledgement of the limitation on how much intermittent electricity the National Grid can accommodate or understanding of engineering realities.

\* There is already considerable resentment that the views and needs of relevant communities are being dismissed by the Welsh Government which the NDF will only serve to increase.

