

Dear Sir,

P.1.

Re: National Development Framework 2020-2040 - Consultation

1) Priority Areas for Renewable Energy - Wind and Solar

- a) Nant y Moch - I am very pleased that former TANB Strategic Search Area D (Nant y Moch) has been omitted from the new areas, as it's not at all suitable for a wind farm, both due to its own outstanding landscape value and environmental concerns that would be caused, and the likely visibility from Snowdonia National Park, with resulting unacceptable effects on it, of any large wind turbines put there. I sincerely hope all plans for any such developments (wind or solar) in this beautiful area greatly valued by local residents and visitors alike, have now been permanently scrapped, especially with the possibility of its inclusion in a future Cribbs Mountain National Park or AONB.
- b) Other Areas - However, I am very concerned about the large number and much increased extent of areas for large-scale wind- and solar- power elsewhere in Wales. Several solar areas are adjacent to National Parks or AONBs (2, 15, 12, 14) and ZTV's produced by Brecon and Radnor CPRW indicate turbines in the proposed wind priority areas would be widely visible, including from within national parks (e.g. Snowdonia National Park just north of Madegwyl, not far from my home). Scenic spots popular with walkers, including myself, such as the summit of Pumlumon, would also be likely affected, possibly by turbines from several areas.

Although I'm glad the northern part of former SSA B, adjacent to Snowdonia National Park has been omitted, I'm concerned PARE wind/solar area 5 now extends further east, and especially south, where turbines might be visible from wild, unspoilt high ground on/near Pumlumon. Powys already has more than its fair share of wind farms, including the new very intrusive Tirgwyn, so I believe this area should not extend northwards beyond the A489/A470, especially to avoid harm to the setting of the large number of prehistoric archaeological sites there, or further disruption to wildlife. Glyndwr's Way National Trail should also be avoided by any PARE's, and the southern 'tail' of area 5 should either be restricted to solar developments only or omitted completely.

c) Issues

I am concerned that even though ^{areas of} deep peat are supposed to be omitted, the overall projected carbon emissions from removal or disturbance to shallower peat or peaty soils if the PARE's were fully exploited, doesn't seem to have been calculated. As peat ^{is} a carbon sink, this could seriously diminish any apparent benefits from the wind farms/solar farms.

PTO

The loss of opportunities to increase open Access land for recreation and public enjoyment if solar farms (which are often fenced for security) are built on currently non Access land that might be possible to redesignate is also worrying. Wind farms would also be unpleasant to walk in, even if permitted.

Grid Connections

It doesn't seem to have been taken account within the environmental constraint methodology used to create the PARE's, that all these developments expected will require grid connection, which itself has an environmental impact. Welsh Government representatives at the information event I attended were unable to tell me where the grid connections were expected to go. It was suggested that rather than a pylon line to England, smaller wooden pole lines to north or south Wales might be used. However, I can't understand how this could be easily ~~feasible~~ ^{achievable} without adverse effects on Snowdonia or Brecon Beacons National Parks it would need to cross, (besides possibly other areas of valuable landscape if other PARE's were connected). Even if different legislation applies, this should have been thought through before presenting the areas to the public, since a renewable energy development without suitable grid access just wastes time in the planning process (eg Llandinor ^{pylon} line). Cumulative effects of the wind / solar farms and associated grid infrastructure should also be available as a 'ball park' ^{estimate} for various routes proposed.

Birds and other mobile wildlife, especially bats

Whilst the Habitats Regulation document suggests that annual movements of birds & bats ~~(on the scale of 1000s of miles?)~~ are less important at the strategic planning stage and would only require study for individual planning applications, the vast scale of the areas proposed for development surely has potential to seriously interfere with their migration or movements between seasonal roosts, as particularly wind turbines can be very dangerous ^{for them}. Therefore, it seems strange, to the layperson at least, why any known flight paths haven't been mapped and avoided? If they aren't known, surely this requires research before proposing such a ~~large scale~~ ^{large scale} policy? In an ~~era~~ era of major concern about declining wildlife it would seem prudent to check in advance the possibility of any 'cumulative ~~bats and~~ ^{bats} effect' on birds or bats rather than risk harm to one of Wales' greatest and most cherished assets? It is also unclear which maps relating to wildlife are being referred to. If the relevant ones haven't been produced yet, surely the policy should be put on hold and the consultation delayed, till they have and the experts can give the public an indication of likely results?

* as opposed to ~~foraging~~ ^{foraging} ~~movement~~ ^{movement}

Methodology

I am concerned it appears the Arup consultants are misusing their otherwise very good investigative mapping tool of environmental constraints to obtain the maximum wind/solar farm areas that would be credible, perhaps on instruction from the Welsh Government? It's unclear why certain constraints the ~~papers~~ would assume should be absolute are treated as 'variable' ~~that~~ ^{if} when a plan involving precautionary exclusion of high value LANDMAP areas, buffers round national parks etc results in minuscule area ^{left} available for turbines, the obvious inference is that 200m turbines are extremely intrusive (and hence it might be better to restrict wind farms to using smaller ones, or even to reject large-scale windpower altogether in favour of more micro and domestic scale turbines) is completely ignored - indeed it's used to justify reverting to a much more permissive scenario - for a very small selection.

This ^{unreal} computer programme, with all the associated work involved, should have been made available ^{early} to local councils and community groups, besides at public events, for a reasonable period, so that ~~people~~ ^{people} can decide for themselves what they value about the Welsh countryside and how it should look, then the policy could have been formulated accordingly on an informed basis. Currently there appears ^{instead} a 'mixed bag' of ^{apparently} arbitrary constraints unintelligible to most people.

Democracy

I am worried that this policy seeks to make most decisions at Welsh Government level, with local authorities only treated as committees. Especially in view of the recent Hendy wind farm decision, for a minister to have such absolute power in the planning process doesn't inspire public confidence that our precious landscapes, wildlife and heritage will be protected, nor that local people will be listened to. I am also concerned the minister apparently has the option to change this policy at any time.

2) Unsustainability of Proposed Regions

I am concerned that for all planning decisions (not just renewable energy), the proposed North Wales, Mid and West Wales and South East Wales regions (especially the first two) give too much power to the cities/large towns within them to the detriment of rural areas. This is inevitable given the imbalance in population, and may be made worse if it is accepted, as implied in the document that people will relocate from rural to urban areas. Here near Tywyn, I believe few people would feel any connection with residents of Wrexham/Deeside, and similarly Mid and West Wales is acknowledged to consist of 2 sub-regions, as residents of rural Powys or Ceredigion have little in common with those of Swansea.

This is likely to lead to biased and unfair planning decisions.

3) Small Modular Nuclear Reactors in North Wales

I strongly oppose the proposal to install small modular nuclear reactors on the former Trawynydd nuclear power station site (Snowdonia Enterprise Zone). This technology is risky as not adequately tested yet, and could endanger residents of the whole North Wales region via accidents or emissions, including those living alongside transport routes. In any case, it would produce nuclear waste requiring disposal, which is not compatible with the well-being of future generations goals, especially health and global responsibility. It should be recognised the original nuclear power station being sited within a national park was a mistake, whilst making efforts to provide suitable alternative work for local residents formerly employed there. The area should instead focus on remediation of the environment, which in turn may provide unexpected economic opportunities.

Yours sincerely,
Sophia Smith

(Sophia Smith)

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