

From: [Gary Swaine](#)
To: [NDF](#)
Subject: Re: Fframwaith Datblygu Cenedlaethol / National Development Framework - estyniad i'r cyfnod ymgynghori / extension to consultation period
Date: 15 November 2019 22:14:43
Attachments: [NDF Response 15.11.19.docx](#)

Please find attached my response to the NDF

regards

Gary Swaine



On 17/10/2019 16:19, NDF@gov.wales wrote:

Prynhawn Da

Mae'r cyfnod ymgynghori ar y Fframwaith Datblygu Cenedlaethol Drafft (FfDC) yn cael ei ymestyn gan bythefnos a bydd yn cau ddydd Gwener, 15 Tachwedd 2019.

Yn dilyn cychwyn yr ymgynghoriad ar ddrafft y FfDC ar 7 Awst 2019, fe ddaeth i'n sylw bod enwau atodiadau yn yr Asesiad Rheoliadau Cynefinoedd (HRA) o bosibl yn ddryslyd ac na chynhwyswyd mapio ategol y cyfeirir ato yn Atodiad B. Rhoddwyd HRA diwygiedig sy'n mynd i'r afael â'r materion hyn ar [dudalen](#) we ymgynghoriad y FfDC ar 21 Awst.

Fe nodwyd hefyd fod potensial am ddryswch yn y tablau yn Atodiad B y Gwerthusiad Cynaliadwyedd Integredig (ISA). Dangoswyd rhifo a geiriad polisi cynharach ochr yn ochr â rhifo a geiriad polisi terfynol yr FfDC Drafft. Rhoddwyd ISA diwygiedig sy'n mynd i'r afael â hyn ac sy'n gwella croesgyfeirio yn y ddogfen ar dudalen we ymgynghoriad y FfDC ar 28 Awst.

Er mwyn bod yn gwbl dryloyw, rydym wedi cyhoeddi rhestr o newidiadau i'r ddwy ddogfen ar dudalen we ymgynghoriad y

Good Afternoon

The consultation period on the Draft National Development Framework (NDF) is being extended by two weeks and will close on Friday, 15 November 2019.

Following the commencement of the consultation on the draft NDF on 7 August 2019, it was brought to our attention that the naming of appendices in the Habitats Regulations Assessment (HRA) was potentially confusing and that supporting mapping referred to in Appendix B was not included. An amended HRA addressing these issues was placed on the NDF consultation [webpage](#) on 21 August.

We also identified potential for confusion in the assessment tables in Appendix B of the Integrated Sustainability Appraisal (ISA). Earlier policy numbering and wording was shown alongside the final policy numbering and wording from the Draft NDF. An amended ISA addressing this and improving cross-referencing within the document was placed on the NDF consultation webpage on 28 August.

In the interests of transparency,

FfDC ac wedi ymestyn y cyfnod ymgynghori i ganiatáu amser ychwanegol ichi ystyried y rhain. Mae'r newidiadau yn rhai bach eu natur ac nid ydynt yn berthnasol i'r ymgynghoriad ar ddrafft y FfDC. Maent yn ymwneud â'r HRA a'r ISA yn hytrach na'r FfDC ei hun ac nid ydynt wedi newid yr asesiadau na'u casgliadau yn sylweddol. Os ydych eisoed wedi cyflwyno ymateb ymgynghori, ac yn teimlo bod y newidiadau hyn yn effeithio ar eich ymateb, mae croeso i chi roi sylwadau pellach. Mae'r holl ymatebion a dderbyniwyd eisoes yn ddilys ac nid oes angen eu hailgyflwyno oni bai eich bod am newid eich ymateb.

Os hoffech gael unrhyw wybodaeth bellach, cysylltwch â Thîm y FfDC drwy ffdc@llyw.cymru ac ar 0300 025 3261 neu 0300 025 6657.

Os hoffech chi gael y wybodaeth ddiweddaraf am ddatblygiadau FfDC, gallwch [danysgrifio](#) i'n cylchlythyr.

Cofion

Tîm y FfDC

Llywodraeth Cymru

we have published a list of the changes to both documents on the NDF consultation webpage and extended the consultation period to allow you additional time to consider these. The changes are minor in nature and are not material to the consultation on the Draft NDF. They relate to the HRA and ISA rather than the Draft NDF itself and they have not materially changed the assessments or their conclusions.

If you have already submitted a response to the consultation, and you feel your response is affected by these changes, you are welcome to submit further representations. All responses already received are valid and do not need to be resubmitted unless you wish to amend your response.

If you would like any further information please contact the NDF Team at ndf@gov.wales and on 0300 025 3261 or 0300 025 6657.

If you would like to be kept up to date on NDF developments, you can [subscribe](#) to our newsletter.

Regards

NDF Team

Welsh Government

Sganiwyd y neges hon am bob feirws hysbys wrth iddi adael Llywodraeth Cymru. Mae Llywodraeth Cymru yn cymryd o ddifrif yr angen i ddiogelu eich data. Os cysylltwch â Llywodraeth Cymru, mae ein [hysbysiad preifatrwydd](#) yn esbonio sut rydym yn defnyddio eich gwybodaeth a sut rydym yn diogelu eich preifatrwydd. Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn anfon ateb yn Gymraeg i ohebiaeth a dderbynnir yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi. On leaving the Welsh Government this email was scanned for all known viruses. The Welsh Government takes the protection of your data seriously. If you contact the Welsh Government then our [Privacy Notice](#) explains how we use your information and the ways in which we protect your privacy. We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

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Regards

Gary Swaine

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

NDF Energy Policy

The idea of the energy policy contained within the NDF Energy section is to increase renewable energy and reduce CO2 and therefore reduce the impact on the climate, look after the planet and make the world a better place to live.

No responsible person who disagree that this is not a cause worth supporting.

The question is then why over in 20 years with significant public support, planning and energy policies has it not we should have already attained a position where renewable energy is fully deployed?

The mid wales connection project started circa 2010 planned for approx. 500 turbines 100 miles of 132kv line 50+ miles of 400kv line was supported by Planning policy and Tan8, yet I believe to date not 1 turbine involved in the project has been deployed.

Public opposition was unprecedented in excess of 2000+ people marched on the Senedd, this number would have been significantly more if it had not been on a weekday. These people were the same people as the ones mentioned above, reasonable, sensible and understand the impact of climate change. They do the recycling, use energy efficient appliances, LED light bulbs etc.

Conversely the Swansea bay tidal lagoon had significant public support but unfortunately a sensible strike price could not be agreed with central government.

So the question is why did one project have significant support and one not?

The mid wales project would have impacted a significant number of people's homes and livelihoods. The impact on the road network not just with the transport of turbine parts but also grid infrastructure would have brought mid wales to a standstill for years. They would have been additional disturbances as the road network would have required an upgrade in many areas.

The Swansea bay project did have some resistance by the public but these were generally where around the construction phase which had a far superior road network to that of mid wales and when completed would have very little visual impact. Because of the chosen location the requirement for grid was minimal. The development itself would have become an attraction.

Additionally, there is no argument regarding the power that was produced as it was 24/7 on and offable, which makes it simple and cheap to integrate into the grid.

When the impacts, the additional grid, road improvements and general disruption are factored into the cost then it may well be that even though the strike price was high on the Swansea bay project that overall it was the cheaper project.

For instance, there is 400kv 2Gw capacity grid line passing across Wales from the now decommissioned Trawsfynydd power station to Wrexham, this is virtually unused. With very low power loading, this is a significant asset that is not being used. Why? The National Grid are paid in a strange way, not just for the power transmitted but by standing assets, therefore as they are a multinational company where the bottom line is critical they will not have the very best interests of Wales as the primary motive.

The NDF energy section is based on a spatial approach to various areas across Wales; this idea may well suit Wales in other areas of the NDF but for energy there should be a whole Wales policy. This would enable the best use of existing assets. Keep the cost as low as possible, but importantly it would have support of the people of Wales.