

Draft National Development Framework

1. NDF Outcomes (chapter 3)

Q1. The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time. Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Disagree

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with most of them

If you disagree with any of the 11 Outcomes, please tell us why:

Whilst most of the outcomes are desirable in and of themselves, there is no recognition of the potential conflict between the objectives, for example, outcomes 2,10 and 11 could be directly in conflict with respect to land use planning. Wales' unique rural character could be destroyed by the over use of industrial scale solar and wind farms in order to fulfil the decarbonisation ambitions.

2. Spatial Strategy (policies 1 - 4)

Q3. The NDF spatial strategy is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years. To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)		X					
Rural areas (Policy 4)					X		

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

As per my previous answer, great care needs to be taken to balance the unique rural, tourist economy and agricultural aspects of rural life with the land hungry and visually unattractive consequences of inappropriate large scale solar and wind farm developments.

Using the NDF to push these developments through also creates a democratic deficit by over-riding consultation levers and established local development policies.

3. Affordable Housing (policy 5)

Q5. The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes. To what extent do you agree or disagree with the approach to increasing affordable housing?

Disagree

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

More use should be made of brownfield sites for housing development. Development should be concentrated around existing towns and cities and should not be mandated by the NDF but go through proper planning processes at local level.

4. Mobile Action Zones (policy 6)

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

If Wales is to compete in the 21st century then better mobile infrastructure is vital to the growth of SMEs and to attract and retain people in work and leisure settings.

5. Low Emission Vehicles (policy 7)

Q9. To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Agree

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

No Response

6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree

7. Renewable Energy and District Heat Networks (policies 10-15)

Q12. To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and solar developments					X		
District heat networks				X			

Q13. If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

With respect to the whole of Wales:

- The Priority Areas are far too large. They cover 4,164 square kilometres of Wales, 22 % of the land area of Wales. Much smaller areas are needed to deliver Wales' renewable generation aims:
 - The 2030 renewable generation target is assumed to be 11.8 TWh. By 2030, with TAN8 project completion, renewable generation will reach 5.7 TWh, leaving 6.1 TWh of new capacity required; 250 square kilometres (wind) or 78 square kilometres (solar) would suffice.
 - If the TAN8 areas were left in place and allowed to achieve 50 % renewables coverage, only 3.7 TWh would be needed, with an NDF requirement of 150 square kilometres (wind) or 47 square kilometres (solar).
 - If Wales applies the Re-energising Wales initiative described in The Economic Costs and Benefits of Renewable Energy Transition in Wales then 29 square kilometres (wind) and 33 square kilometres (solar) would be required.
- The NDF ignores any expansion of generation using offshore wind or small modular nuclear reactors. These technologies enjoy support from the UK Government, which is not the case for onshore wind and solar generation. Offshore wind is by far the least contentious infrastructure to deploy and with Wales' coastal resources, it's extraordinary that the NDF is silent on the potential for offshore wind farms.
 - If an extension of the Gwynt y Môr offshore wind farm goes ahead this could add up to 1.9 TWh to Wales' annual renewable generation, 16 % of the renewable target of Policy 10
 - If Wales successfully completes a small modular reactor of 300 MW, perhaps at Trawsfynydd, operating at load factor of 85 %, this would deliver 2.24 TWh per annum, 19 % of the 2030 Policy 10 renewable generation target, and would match the production from 1 GW of onshore wind or 2.3 GW of solar.
- An increased deployment of renewable energy will increase the cost of energy for energy-intensive industries such as steel, manufacturing, agriculture and food production.
- House prices will fall in the Priority areas because they will be blighted by the loss of visual amenity from wind and solar farms; the larger the area, the larger the reduction in consumer confidence, the lower economic growth and the higher the risk of recession. This will hit the visitor economy in small beauty spots like the Isle of Anglesey where the burden of priority area 1 will affect some 26% of the land mass of the island
- The development process for the Priority Areas uses discretionary application of many usual planning constraints described in Local Development Plans. These include national planning policy 'constraints' like the AONB
- The NDF developers acknowledge this will increase the likelihood of objection.
- Application of ALL planning constraints developed within LDPs for wind and solar generation would result in more than enough renewable development area to meet both the Priority 10 target of 70 % electrical energy to be from renewables by 2030 and the Re-energising Wales initiative by 2035.
- Section 6 of Planning Policy Wales, Edition 10 (PPW10)(18) pp 118-35 attaches great importance to the protection of Listed Buildings, Conservation Areas, Historic Assets of special local interest, Historic Parks and Gardens, Historic Landscapes, World Heritage Sites, and Archaeological Remains. The casual attitude to the LDP constraints employed in the NDF process runs counter to PPW10.
- Solar generation is a very poor choice for energy production owing to inability to match demand, no system resilience or reliable storage and no provider obligations to guard against intermittency and security of supply, leading to power cuts
 - The energy returned for solar panels, compared to the the energy expended ratio is below 1.
 - Daily solar production is badly matched to the demand curve.
 - There is little production in winter months.
 - National Grid have raised concerns about grid stability caused by solar production during times of

light loading of the grid.

With respect to the island of Anglesey

1. NDF PRIORITY AREA 1 SHOULD BE REMOVED

2. Priority Area 1 covers 26 % of the island's land area.

3. Faulty application of the LDP constraints shows an opportunity for solar opportunity on the flood plain of the River Cefni.

4. Stage 2 of the NDF development process makes use of the LANDMAP 'resource'. The Geological LANDMAP for Anglesey shows, in the main, a HIGH rather than an OUSTANDING grading. The developers of LANDMAP should be made aware that:

a. Under the name GeoMôn, in recognition of its extraordinary geological heritage, the entire island gained membership of the European Geoparks Network in spring 2009.

b. In 2015 UNESCO placed Global Geoparks alongside its World Heritage Sites in status - giving the island's geology unique protected status.

c. Anglesey now enjoys the title GeoMôn UNESCO Global Geopark..

d. Parys Mountain Copper Mine is an anchor point on the European Route of Industrial Heritage. This would be in the middle of Priority Area 1. The Port of Holyhead is attracting international cruise visitors who visit the local geology and heritage, which would be hugely degraded by wind and solar farms.

5. The habitat LANDMAP needs revision in the light of NRW's published spatial survey of the protected species of great crested newts on Anglesey.

6. The NDF development process excluded an assessment of the visual impact of large solar farms upon observers within the AONB as 'too difficult to study'. The PPRW10 obligation to assess the impact of a development upon a designated area has not been discharged. In view of that failing, a generous contingency buffer zone around the AONB should constrain solar and wind farm development.

7. An intervisibility assessment for building 150 m high wind turbines anywhere on the island showed they would be visible within the AONB (as are the existing 129 70 m high turbines). For much of the island, these wind turbines would also be visible from the Snowdonia National Park, and parts of the Llyn Peninsula AONB. But the NDF developers diminish this assessment:

'Anglesey AONB surrounding [the interior of Anglesey] is important due to the views outwards across the sea rather than into the priority area. On this basis, we have given the intervisibility analysis less weight. Nevertheless, the Priority Area for Wind and Solar Energy has been refined to include a buffer area around the AONB.'

This judgement is without an evidence base and is obviously biased in favour of a larger Priority Area. It's tantamount to saying 'if you don't like the wind turbines and black solar panels, just look out to sea instead'. Moreover, the statement does not acknowledge the landscape assets, which make Anglesey so attractive are precisely the combination of green, open, rural space and the 100 miles of coast line. It is enshrined in Planning Policy that in AONBs, planning authorities should give GREAT weight to conserving and enhancing the natural beauty of AONBs, and should have regard to the wildlife, cultural heritage and social and economic well-being of the areas.

National Parks and AONBs are of equal status in terms of landscape and scenic beauty, and must both be afforded the HIGHEST status of protection from inappropriate developments. .

8. Tourism is one of the Island's largest industries, tourism currently [2016] brings 1.6m visitors to the Island each year; supports more than 4,000 jobs and is worth around £280m to the local economy.

The island's Destination Management Planning is 'about all of us working together to make our Island the best destination to visit, work and play. With this approach, we aim to attract more visitors and ensure they have positive experiences whilst on Anglesey.' And they don't want to see windmills and solar panels - especially covering a quarter of the green space and coastal outlook they chose to visit the island for.

8. The Regions (policy 16)

Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale? The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

Disagree

9. North Wales (policies 17-22)

Q15. We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale. To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly disagree

10. Mid and South West Wales (policies 23-26)

Q16. Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro. To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Agree

11. South East Wales (policies 27-33)

Q17. In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport. To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Agree

Q18. If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

In line with my earlier comments on renewable energy with respect to Anglesey and the priority areas identified for renewables development, the presumption in favour of this being an opportunity for North West Wales needs to be more nuanced to take account of the deliverability and desirability of off shore wind and small scale nuclear. Furthermore, the approach of the NDF is very much a 'predict and provide' mentality rather than a more sustainable solution using energy use reduction methods as well. There is no mention of the other green measures which can help decarbonisation such as the modernisation of housing stock using better insulation and support for domestic micro generation such as ground source heat pumps, community energy schemes or roof mounted solar panels. At the other end of the scale, more ambitious infrastructure such as using tidal energy is given little consideration.

12. Integrated Sustainability Appraisal

Q19. As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development. Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

As with my earlier responses, the balance between desired outcomes needs to be weighed up so there are not unintended consequences say from the drive for renewables blighting the landscape and destroying the tourism and visitor economy in a small ecosystem like Anglesey.
The protection of species and safeguarding the natural environment need to be part of the indicators - as well as increasing biodiversity. Sustainability assessments should take account of the unique place based characteristics of regions like Anglesey, including the AONB and not water down any safeguards for these areas which are present in national planning policy.

13. Habitats Regulations Assessment

Q20. As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds. Do you have any comments on the Habitats Regulations Assessment report?

As per previous, the presumption should be in favour of no development in these special wild places and unique habitats rather than 'mitigating' the impact of development. In particular, the impact of solar park developments in the special areas of habitat for the great crested newt need to be a factor and a brake on inappropriate developments.

14. Welsh Language

Q21. We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The positive effects could be increased if small businesses could be encouraged to develop bi-lingual materials and if there were grants available to support them in doing so.

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

It would be great to develop online resources to help people learn Welsh and for more marketing of the richness and heritage of the language.

15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

The NDF does not give sufficient weight to Wales' historic assets and heritage, which are highly significant to the visitor economy and would be irreparably damaged were they to be blighted by contiguous solar or wind farm sites

Section 6 of Planning Policy Wales, Edition 10 (PPW10) (18) pp 118-35 attaches great importance to the protection of Listed Buildings, Conservation Areas, Historic Assets of special local interest, Historic Parks and Gardens, Historic Landscapes, World Heritage Sites, and Archaeological Remains. As an example, this quotation covers the policy for conservation areas:

6.1.14 Conservation Areas

There should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings. Positive management of conservation areas is necessary if their character or appearance are to be preserved or enhanced and their heritage value is to be fully realised. Planning authorities should establish their own criteria against which existing and/or new conservation areas and their boundaries should be reviewed. The preparation of conservation area appraisals and management plans can assist planning authorities in the exercise of their development management functions.

6.1.15

There is a strong presumption against the granting of planning permission for developments, including advertisements, which damage the character or appearance of a conservation area or its setting to an unacceptable level. In exceptional cases, the presumption may be overridden in favour of development considered desirable on public interest grounds.

6.1.16

Preservation or enhancement of a conservation area can be achieved by a development which either makes a positive contribution to an area's character or appearance or leaves them unharmed. Mitigation measures can also be considered which could result in an overall neutral or positive impact of a proposed development in a conservation area.

6.1.17

Conservation area designation introduces control over the total or substantial demolition of unlisted buildings within these areas, but partial demolition does not require conservation area consent. Procedures are essentially the same as for listed building consent. When considering an application for conservation area consent, account should be taken of the wider effects of demolition on the building's surroundings and on the architectural, archaeological or historic interest of the conservation area as a whole. Consideration should also be given to replacement structures. Proposals should be tested against conservation area appraisals, where they are available.

The relationship between the NDF and locally democratically accountable structures risks a democratic deficit over crucial development matters, which may be taken out of the hands of local people, so some assurances on the checks and balances to safeguard against inappropriate developments and lack of accountability need to be added. This will also be necessary to guard against legal challenges based on the inconsistencies between the proposed NDF, national (non devolved) planning guidance and locally applicable constraints based on knowledge of local factors.

16. Are you...?

Q24. Are you:

Providing your own personal response

Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Sally Sykes

Organisation (if applicable)

-

Preferred contact details (email/phone/post)

[REDACTED]

Q26. If you want to receive a receipt of your response, please provide an email address.
Email address

[REDACTED]

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response