

RESPONSE TO SCHEDULE OF CHANGES TO THE DRAFT NATIONAL DEVELOPMENT FRAMEWORK

In October I submitted a substantial response (51 pages) to the National Development Framework.

I responded briefly to question 10 (**Mid and South West Wales policies 23-26**) and in significant detail to question 7 (**Renewable Energy and District Heat Networks**).

I am aware that many respondents expressed concerns about the proposals in question 7 (**Renewable Energy and District Heat Networks**) and I am therefore very disappointed to see very little fundamental change made to this policy. I would ask whether the views of respondents have been sufficiently recognised and taken into account in the changes to the NDF.

In this letter it is not appropriate to restate all of my original arguments however I would like to raise the following specific issues for your consideration:

POLICY 17 - ISSUES RELATING TO RELIABILITY OF EVIDENCE BASE

1. Under Policy 17 in Schedule of Changes to the draft National Development Framework it is stated:

In Pre-assessed areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18.

I would be grateful if you would consider why, with regard to Powys (New Pre Assessed Areas for wind 3,4 and 5), the conclusion reached by the Welsh Government modelling is the exact opposite of the conclusion reached by AECOM REA for Powys 2017.

In particular, was the modelling based on discredited evidence?

The NDF report stated (p16) that:

*“To help avoid including the most sensitive landscapes during the refinement of the Priority Areas, a review of the **existing** landscape sensitivity and capacity assessments available in Wales was undertaken.”*

“In addition to this, a review of whether LPA’s had undertaken REA’s and whether these studies consider landscape sensitivity was also undertaken.”

It is therefore a major concern that there were significant errors and omissions in the above review by ARUP.

Appendix C3: Summary of Sensitivity Assessments

LPA	Sensitivity Assessment	Type of development considered	Reference?	Coverage of Study	Comment/Summary	Which Priority Area for Wind and Solar Energy falls with the LPA
Powys County Council	None published on website	N/A	N/A	N/A	N/A	5,6,7,8, 14

The above information is **clearly incorrect** as a detailed Landscape Sensitivity assessment for Solar Farm Development was undertaken by ENPLAN for Powys County Council and published in May 2017.

Appendix C4: Summary Renewable Energy Assessments

LPA	REA?	Reference	Does it consider landscape sensitivity to wind or solar development?	Comment	Which Priority Area for Wind and Solar Energy falls with the LPA
Powys County Council	Yes	AECOM (November 2016) Renewable and Low Carbon Energy Assessment	No	The REA constitutes an evidence base to inform the preparation of Powys' LDP. The REA consists of a high level assessment of the potential for renewable and low carbon energy generation at different scales , and at different levels of detail.	5,6,7,8, 14

AECOM was responsible for producing the original report which underpinned the Powys Renewable Energy Policy November 2016. Following responses from over 600 Powys residents, expressing deep concern, it was found that the AECOM report (Nov 2016):

- Had significant shortcomings in methodology
- Relied on a significantly flawed dataset that underpinned the policy
- Resulted in a totally disproportionate Renewable Energy Target for Powys.

It is therefore a matter of deep concern that this flawed document is the one quoted and used in the NDF.

AECOM undertook the whole exercise again and a **new report was published in May 2017.**

With regard to **Wind Energy Resource**, the **May 2017 AECOM** report included the following considerations:

- i. Opportunities for wind development of between 5MW and 25MW principally outside the existing SSAs but in the interest of obtaining the **maximum available resource** it included areas both inside and outside the existing SSAs.
- ii. Wind speeds: AECOM created a 1.5km² grid GIS data layer for the Powys LPA area showing average annual speeds at 45m above ground level attributed to each 1.5km² cell.

It was assumed that there is no wind energy potential in an area with an average annual wind speed of less than 6.0m/s.
- iii. Constraints: These included Statutory Designations (listed on page 23) and Non-Statutory Designations (listed on p24).
- iv. Grid Connection: PPW requires consideration of the electricity grid as part of renewable energy evidence base to inform LDP policies. Electricity grid comprising 33, 66 and 132kV was mapped by AECOM with only sites with available resource within 10km of any line being considered accessible.

AECOM then concluded with regard to LSAs for wind (p24):

There are no remaining least constrained land parcels of sufficient area to identify wind LSAs for local authority wide schemes of installed capacity range 5-25MW

With regard the **Solar Power Resource** the AECOM (May 2017) report:

Identified 33 initial LSAs for Landscape Assessment (p43) and of these 20 remained after the Landscape Assessment and these 20 are identified in the LDP approved in April 2018

Given that representatives from the WAG attended the Hearing Sessions regarding Powys Renewable Energy Policy I find it difficult to understand why the above very significant errors in the ARUP review have not been picked up.

Has the data behind the ARUP report been subject to sufficient scrutiny by WAG?

If the May 2017 AECOM report and its conclusions were not available to ARUP how can we have any confidence in the report produced by ARUP?

How can its conclusions be reliable with regard to Powys if it used the discredited 2016 AECOM report and took no account of the revised May 2017 AECOM report and the May 2017 ENPLAN Sensitivity Assessment?

How, as citizens, can we be expected to have any confidence or trust in evidence or modelling that produces such stark differences in conclusions and outcomes?

Trust and respect for information and action at government level is vital. If citizens do not feel that they can have trust and confidence the information that they are given, particularly when the

consequences of that information are highly significant, then the process of compliance with authority and respect for government starts to break down.

POLICY 18 RELIABILITY OF EVIDENCE BASE AND LACK OF PROTECTION outside PAA's

In the Schedule of Changes to the draft National Development Framework (Policy 18) it is stated that:

Proposals for renewable and low carbon energy projects (including repowering) qualifying as Developments of National Significance will be permitted subject to policy 17 and the following criteria:

1. *Outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an **unacceptable** adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty);*
2. *The proposal is designed to minimise its visual impact on nearby communities and individual dwellings, and the cumulative impact of the proposal, with other existing or proposed development, is **acceptable**;*

*Plus
further criteria 3 -10*

1. In the above two criteria and also criteria 3 to 10 who will define what is **acceptable**?

Criteria 1 gives some protection to National Parks and AONB but it offers little protection to the wonderful unspoilt, but unprotected, landscape of rural Mid Wales.

I am particularly concerned that two treasured landscapes, Radnor Forest and Aberedw Hill, which lie outside the Pre-Assessed Areas, are already receiving the attention of wind farm developers.

I recognise that the redrafted version of Policy 18 offers more protection than the original version in the NDF but do not feel that it offers significant protection to the wonderful unspoilt landscapes of rural Mid Wales which are not protected by National Park or AONB status.

Given the extensive area in Powys already covered by Pre- Assessed Areas 3,4 and 5 how can it be considered acceptable to offer yet more of our treasured landscape to developers?

How is it acceptable that a key town such as Llandrindod Wells could be potentially surrounded by large scale wind farm developments?

2. Again, how can the ARUP evidence justify this further development outside the PAA's when it is in stark contrast to the conclusion reached by the AECOM 2017 report.

LACK OF INCORPORATION OF MARINE PLAN INTO NDF

It would seem to be a fundamental flaw of the Renewable Energy Policies in the NDF that the Marine Plan does not form an integral part of the policies.

Under Policy 18 (on page 82) in Schedule of Changes to the draft National Development Framework it is stated:

*Policy 18 provides a decision-making framework for renewable and low carbon energy technologies. The planning system sets policy and takes decisions on on-shore schemes. The Welsh Government is supportive of off-shore proposals and sees them as an important part of our future energy mix **but they do not fall within the remit of Future Wales**. The on-shore development aspects of off-shore schemes are supported. Future Wales and the Marine Plan address energy and reflect the energy hierarchy as set out in Planning Policy Wales. Both plans recognise that there are a number of opportunities to generate renewable energy across a variety of technologies both on-shore and off-shore which should be maximised to help meet the targets.*

Given that off-shore technologies have the potential to supply ALL of the UK energy needs I would ask you to consider why “**they do not fall within the remit of Future Wales**”.

1. At UK level, at the beginning of October, Boris Johnson announced plans to power every home in the UK within 10 years using off-shore wind technology. By 2030 it is planned to increase the offshore wind capacity to 40GW (10 times the existing capacity), including 1GW of floating turbines.

Within the offshore wind industry there is little doubt that this target can be achieved. The sector has already exceeded expectations in recent years and investors’ appetites have been whetted by years of falling costs, guaranteed returns and growing political support.

Why then is it necessary to further destroy the treasured landscape of rural Mid Wales which already makes a highly significant contribution to the supply of onshore wind energy?

2. At a global level , a recent analysis by the **International Energy Agency (IEA)** stated that erecting wind turbines on the world’s best offshore sites could provide **more than enough clean energy to meet global electricity demand**.

The study of the world’s coast lines found that that offshore windfarms alone could provide more electricity than the world needs – even if they are only built in windy regions in shallow waters near the shore.

The analysis by the IEA revealed that if windfarms were built across all useable sites which are no further than 60km (37 miles) off the coast, and where coastal waters are no deeper than 60 metres, they could generate 36,000 terawatt hours of renewable electricity a year. **This would easily meet the current global demand for electricity of 23,000 terawatt hours.**

A press release by the IEA on 25th October 2019 stated:

*"The huge promise of offshore wind is underscored by the development of floating turbines that could be deployed further out at sea. **In theory, they could enable offshore wind to meet the entire electricity demand of several key electricity markets several times over, including Europe, the United States and Japan.**"*

Why then, is it necessary to further desecrate the landscape of rural Mid Wales?

3. At Wales level, the Welsh National Marine Plan states on p99:

339. *The narrative underpinning the Energy-Low Carbon Sector Objectives sets out the Welsh Government's conclusion that **there is significant potential and a strategic need to develop marine renewable energy in the Plan area. It identifies offshore wind energy as a proven and strategically important technology with considerable scope in the near term for further large scale-development. It also recognises that wave and tidal technologies may offer medium to longer term potential, with the current focus on these sectors being on smaller scale demonstration and test development coupled with strategic evidence development.***

Given this statement I would be grateful if you would consider why the Marine Plan does not form an integral and highly significant part of the NDF?

I have to ask the question as to whether the strong focus on large scale onshore wind and solar technology is being driven by the vested interests of developers, as clearly Welsh demand and UK demand for clean energy can be more than adequately met by rapidly developing marine sources.

ISSUES RELATING TO DEMOCRACY AND INVOLVEMENT AT LOCAL LEVEL

1. The environment Wales Act 2016 states that net Welsh emissions must be at least 80% lower than a defined base level and in order to achieve this the NDF sets the following targets:
 - Wales to generate 70% of its electricity consumption from renewable energy by 2030
 - One gigawatt of renewable electricity capacity in Wales to be locally owned by 2030
 - Renewable energy projects to have at least an element of local ownership by 2020.

However, I have heard the Energy Minister, Lesley Griffiths, state that her aim is not that Wales should generate 70% of its electricity consumption from renewable energy by 2030 nor even that Wales should be self-sufficient in Renewable Energy, rather the Assembly aim is that Wales should be a **net exporter of Renewable Energy** to Europe including to large rich developed countries such as Germany.

It would appear that in order to achieve this aim the wonderful unspoilt uplands of rural Mid Wales are to be turned into an industrial wasteland and its communities, its economy and its way of life sacrificed. The proposals in Revised Policies 17 and 18 will bring distress, anger, distrust and disharmony to the affected communities for decades to come. I fear that if the concerns of rural Mid Wales residents are ignored then it will lead to widespread distrust and resentment of the Welsh Assembly.

In order to meet climate change goals we will not simply have to generate more clean energy, rather it will require a fundamental change in the way in which we all lead our lives. For this to happen citizens will need to be fully engaged with the process. The proposals in the NDF with regard to large scale on shore wind farms will destroy everything that I and many others treasure and hold dear. How can we possibly engage with such a process?

If these proposals were the only way to combat climate change and meet the WAG goals, then it might just be acceptable. However, it is most evidently **not** the only way to reduce carbon emissions and meet the WAG goals with regard to Renewable Energy.

2. In November 2016, the proposal in the draft Powys LDP to allocate up to 40% of Powys uplands as suitable for wind LSAs generated very significant public concern. Over 600 Powys residents, including myself, responded to the public consultation on Renewable Energy with over 25 then going on to speak at the hearing sessions which were each packed with members of the public from all backgrounds. Many of us gave up significant time to engage in the democratic process over a period of 18 months, reading the many documents and producing responses and reports of our own. Some, like myself started with little knowledge but others had deep and wide knowledge of renewable energy, its requirements and its implications.

I state again the final conclusion of that process (AECOM Report p24):

There are **no** remaining least constrained land parcels of sufficient area to identify wind LSAs for local authority wide schemes of installed capacity range 5-25MW

The Renewable Energy proposals for rural Mid Wales contained in the NDF make a mockery of that democratic engagement.

How as citizens can we respect a process and a conclusion that so completely undermines local democracy?

My faith in democracy has already been significantly shaken by the decision of the Energy Minister to overturn the decision of the LPA and the Independent Inspector in relation to the Hendy Windfarm development at Llandegley, with no real justification given for the Minister's decision.

3. The WAG document: **Community Strategies and Planning Part 2** states on page 47:

Community involvement

7.11 The involvement of local people is central to the effective development and implementation of community strategies, and to wider change and improvements in the longer term. There is an **often untapped pool of ideas, knowledge, skills, experience, energy and enthusiasm among individuals, groups and communities as a whole which, if realised, can be a real driver for change.** Community strategies should provide an opportunity to **put local people at the heart of partnership working and should be grounded in the views and expectations of those people.**

7.12 If community strategies are to respond to public concerns, there needs to be **genuine public engagement** and involvement **throughout the process.** It is important that community planning enables communities to be **fully involved in establishing both the long-term vision and the shorter-term priorities for action.** It would not be sufficient simply to **consult communities on a range of options determined by the authority and its partner organisations.** Attention should be given at an early stage to ensuring that all sections of the community have the opportunity to participate.

Did the NDF strategy put local people *at the heart of partnership working*?

How can the strategy be *grounded in the views and expectations of those* people if we were not involved in the development of the policy?

Were we not simply consulted on a *range of options determined by the authority and its partner organisations*?

The country is on the verge of a Brexit crisis – a crisis largely due to the fact that the demands of the rich and powerful have been allowed to dominate whilst the concerns and needs of those at the bottom have been ignored or worst still derided. It is the large global multi-national companies, far removed from the locality that gain from large scale wind and solar farm developments whilst the local community suffers the consequences in the destruction of treasured landscapes.

4. **Planning Policy Wales 10** defines *sustainable* development as “the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.”

I appreciate that the proposals offer diversification and potentially significant financial benefit for some individuals. However, there are many more people for whom the environmental, economic and emotional impacts will be devastating. The resulting conflict could destroy community cohesion for many years to come.

5. The company chosen to perform the assessment for the Renewable Energy policy has the following stated mission on its website:

Renewable Energy

*“With extensive experience in solar, hydro, both onshore and offshore wind, **we work with clients to ensure renewable energy sources for years to come. From helping acquire large scale developments, to designing to designing the right offshore foundation through to project management, we support renewable energy programmes from start to finish.***

A company with this stated mission will inevitably produce a report that is biased towards maximising the land available for large scale wind and solar projects in order to meet its stated aspirations to its clients.

ARUP, a global company, is a company of city- based professionals, far removed from rural Mid Wales, who demonstrate little knowledge or understanding of rural mid Wales, who do not value its cherished unique qualities and who show scant regard or care for its communities and its way of life.

6. The NDF Statement of Public Participation (Revised July 2019) states:

3.7 *It is important that people have the opportunity to be involved in the preparation of the key NDF documents **before they are published for consultation.** Effective engagement means people will have had the opportunity to shape the emerging NDF before the consultation stages including providing evidence they feel should be considered through the process.*

With regard to the ARUP research it is of significant concern that the initial *Stakeholder* workshops in September 2018 were held in Swansea and Llandudno, and that the final *Stakeholder* workshops, in December 2019 were held in Cardiff and Llandudno, three urban centres far removed in distance, culture and economy from rural Mid Wales that will bear the consequences of these decisions.

I would ask the questions:

- i. Who were the *extensive range of stakeholders* that along with the WAG identified the initial range of constraints?
- ii. Did they include a full range of representatives from environmental groups and from the residents of rural mid Wales?
- iii. If not, then how can we have any confidence that the full implications of these proposals were properly considered?

7. It also of significant concern that the workshops for refining the priority areas consisted only of representatives from WAG, NRW and ARUP. The ARUP report states in Appendix I page 3 that local *knowledge* of the four considered PSAs was put forward by members of NRW.

Under the discussion regarding Priority Area 6, it is stated:

*“Attendees raised concern that there is a significant amount of renewable energy generation already within this area. Data provided by Welsh Government on existing generation shows that **only Garreg Llwyd 34MW wind farm currently exists within this priority area.**”*

This statement is incorrect. It clearly demonstrates a lack of local knowledge as the highly controversial Hendy Windfarm 17MW lies within the boundary of PSA 6. It also ignores the 20 LSAs for Solar Power designated in the Powys LDP, adopted April 2018.

It was also highly misleading to consider only four of the originally proposed PSAs in the refinement workshops. Original PSAs 5,6,7 and 8 all lie within Powys and together they occupy a significant percentage of upland Powys, forming an almost unbroken 50-mile chain from Welshpool to Brecon and almost completely surrounding Llandrindod Wells on three sides.

It is clear that the representation of *local knowledge* was significantly deficient, and the conclusions reached as a result of this process cannot be sound.

I would contend that a process that starts at community level would produce a very different solution.

8. Llandrindod is identified as a growth town in the NDF. Who will want to live and work in a town where the surrounding uplands are destroyed and dominated by an industrial landscape?

Who will want to live and work in Powys when our landscape and the opportunities that it provides for the economy are destroyed?

Who will want to live and work in Powys when our green environment is dominated by industrial sites?

How will we attract doctors, nurses, teachers and other professionals if we sacrifice so much of our green environment - a task that is already very difficult. What are the implications for the future health and prosperity of Powys if we fail to attract professional people?

What will be the effect on our small rural school if, as a result of depopulation, there is a decline in pupil numbers? If our small rural schools close, what effect will this have on social cohesion?

Our need for wild and open spaces has never been greater. What will be the effect on our mental health of needlessly destroying our precious uplands?

If you were a pioneer in innovative Renewable Energy technology, would you want to live in a country where the thinking is dominated by large-scale land-based wind and solar industrial development sites, or would you want to live and work in a country that is forward looking, imaginative and creative, open to and supportive of new ideas, ideas that perhaps challenge its traditional thinking?

9. I have always in principle supported the establishment of the Welsh Assembly believing that it would transfer power from the top down government of a distant Westminster Government to the smaller communities of Wales. However, it would appear from the NDF that in too many respects we have simply swapped top down government in Westminster for top down government in Cardiff.

Can we not demonstrate a better form of democracy in Wales? A democracy that isn't city and large town based but that starts from the bottom and is rooted in our villages and small towns that form the bedrock of rural Wales. A democracy that encourages informed debate and draws citizens together to solve problems rather than one that imposes solutions on them.