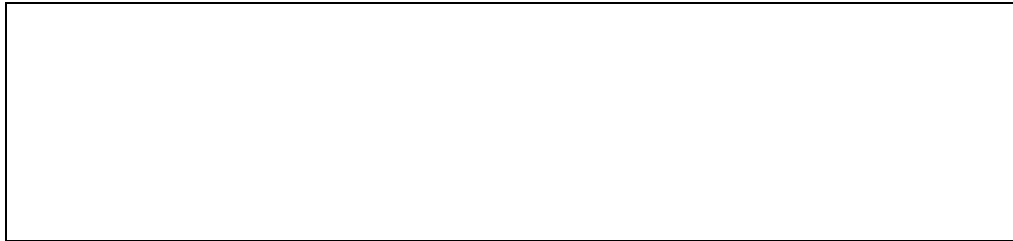


From: [Alison Davies](#)
To: [NDE](#)
Subject: Response to Draft NDF
Date: 31 October 2019 17:04:00
Attachments: [Draft NDF response 311019.doc](#)

Dear NDF Team

Please see the attached response to the consultation.

Regards
Alison Davies
Chairman Conservation of Upland Powys



NDF Team,
Planning Policy Branch,
Welsh Government,
Cathays Park,
Cardiff CF10 3NQ

30th October 2019

Dear Team member,

Consultation Response: Draft National Development Framework.

Conservation of Upland Powys (CUP) is a voluntary organisation, it has worked for over 20 years to protect the uplands of mid Wales from inappropriate development, of which we see windfarms, numerous single turbines, the associated transmission and other works to be of greatest threat. The membership comprises of over 500 people who live and work here.

We respond to your consultation

We respond to the above consultation and in particular register our extreme concern regarding the limited vision in the Draft NDF for societal, economic and environmental resilience in the region identified as Mid and South West Wales.

1. The document identifies some of the problems that would be created by the proposal of forming this region as Mid and South West Wales and states that this *means that the region does not have the degree of interconnectedness of other regions.*

It goes on to state: *From a high level national perspective, there are two broad spatial sub-regions – the built up areas around Swansea, Neath Port Talbot, southern Carmarthenshire and the Haven towns, and the dispersed settlements in a wider rural hinterland across north Pembrokeshire, Ceredigion, Powys and northern Carmarthenshire.*

It infers, therefore that this is actually two regions, not one. We also note in Policies 23 and 24 that investment will focus on the Swansea Bay and Llanelli area.

Chapter 3 refers to distinctive regions; this is contradicted by the proposal to create the Mid and South West Wales Region. There is almost no investment planned for Powys, beyond that set out for

We are strongly opposed to the creation of a Mid and South West Wales Region. It would be disproportionately large in comparison with the size of Wales, *lacks interconnectedness.* This proposal contravenes the 'distinctive regions as in Chapter 3 and conflicts with the aspirations set out in the WBfGA.

2. The document states that WBfGA provides a basis for the Draft NDF but there seems to be little substance to demonstrate in what way it has provided that basis with regard to Mid Wales.

3. **Natural Resources and a living landscape.**

The Draft NDF focuses on the wind and solar resource of Mid Wales, with little acknowledgement of ecosystem services such as carbon sequestration, water storage and provision, food, recreation, health and wellbeing.

- a. The Mid Wales landscapes already have significant windfarm development; yet upland areas where windfarms and their infrastructure are not installed provide significant carbon storage not only in peat but its dark soils and woodlands. Potential for further sequestration is a significant part of the strategic planning of the environmental and agricultural sectors.

- b. Tourism plays a very significant role in the economy of Mid Wales, and research has shown that the tourists who visit or stay in the countryside do so to enjoy peace and tranquillity, they have particular interests in nature.
- c. The only route from England to the Welsh Coast where windfarms are not visible is the A458 and A470 north to Dolgellau.
- d. The Draft NDF refers to connectivity through the road and rail network but glosses over the requirement for powerlines, cabling etc as part of any energy generation scheme in Mid Wales.
- e. Mid Wales' roads have undergone considerable realignment, with new routes constructed for windfarm parts to reach the sites. Such future developments are very likely to also require similar works, putting considerable strain on communities.
- f. Cabling from any / all generation locations would be required to a main station, and powerlines from that hub would then be required to take the power to England.
- g. Welshpool is promoted as the Gateway to Wales and the Town Council continuously strives to enhance and promote the town and locality for the benefit of residents, businesses and Wales as a whole. Evidence shows that our tourism sector is based upon the landscape and countryside of the surrounding area, the level of change proposed in the Draft NDF will have significant negative impacts upon the businesses and residents of Welshpool and the surrounding area through changing and limiting its economic foundation.
- h. There is no evidence that the reduction in Welshpool's income from tourism would be replaced or increased by that potentially offered in wind and solar industries.

It did not go unnoticed in Powys that there was no consideration of the existing road network, when TAN 8 was devised and it also became evident that the electricity infrastructure capacity was based upon assumptions of increased cabling that had been rejected by OFGEM several years earlier.

It was also a cause of some derision that the First Minister at the time stated that the turbine parts would be transported on our dual carriageways. These few examples may give some understanding as to why there is such opposition to the draft proposals in the NDF.

Draft NDF only responds to societal, economic and environmental (including nature) by proposing more wind and solar development, which we see as retrograde and 'industrialisation' of our most precious resource.

There are tremendous opportunities for enhancing nature, landscape, the lives of our communities and Wales' infrastructure, yet this draft document ties hands, crushes aspiration and states that significant, and to many, unacceptable change to our greatest assets is the way forward for the forthcoming generation.

Yours sincerely,



Alison Davies

Chairman

