

From: [John Harold](#)
To: [NDE](#)
Subject: NDF consultation response from Cymdeithas Eryri
Date: 15 November 2019 14:07:46
Attachments: [Cymdeithas Eryri response to NDF consultation 14 Nov 2019 Final.pdf](#)

Ymateb ynghlwm
Response attached

Diolch

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Sent by email to ndf@gov.wales

15 November 2019



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Dear Sir or Madam

Draft National Development Framework for Wales, 2020 – 2040

Response from Cymdeithas Eryri the Snowdonia Society

The Snowdonia Society is a registered charity, established in 1967, which for over 50 years has contributed to the work of caring for and protecting Snowdonia. The Society's activities cover the whole of Snowdonia National Park but extend beyond its boundaries where appropriate. The Society's object is: 'to protect and enhance the beauty and special qualities of Snowdonia and to promote their enjoyment in the interests of all who live in, work in or visit the area both now and in the future.'

The Society supports the consultation responses on the draft NDF from the Alliance for Welsh Designated Landscapes.

In addition, the Society makes the responses overleaf on matters specific to Snowdonia and its National Park:

- Consultation question 7 on renewable energy (policies 10 - 13) and the proposed designation of 'Priority Areas' for wind and solar energy close to the boundaries of the National Park.
- Consultation question 9 on policies for the North Wales region, specifically Policy 22 on 'North West Wales and Energy' regarding whether Trawsfynydd in the heart of the National Park is to be identified as a potentially suitable location for one or more 'Small Modular Reactors'.

In paragraphs 4, 5, 10 and 11 overleaf we make some specific recommendations to improve the draft NDF which I hope are helpful.

I am copying our response to the Snowdonia National Park Authority for information.

Yours sincerely

John Harold
Director

Cymdeithas Eryri the Snowdonia Society
1967 - 2017

Yn gwarchod, gwella a dathlu Eryri ers 50 mlynedd - Protecting, enhancing and celebrating Snowdonia for 50 years

Elusen gofrestredig rhif/Registered Charity no: 1155401

Consultation question 7 on renewable energy (policies 10 - 13): specifically (a) the proposed designation of 'Priority Areas' for wind and solar energy very close to the boundaries of the Snowdonia National Park and (b) what constitutes 'large scale' and 'small scale' energy development.

1. We welcome the statement in Policy 12 that large scale wind and solar energy development is not acceptable within National Parks and AONBs.
2. We also welcome that Area 15 on the diagram on page 42 entitled 'Wales Energy Priority Areas' excludes the part of 'Strategic Area 5: Carno North' on Map 3 in TAN 8 which is closest to the National Park boundary in the vicinity of Mallwyd and Cwm Cywarch.
3. However, we are concerned that the diagram on page 42 includes newly designated 'Priority Areas' that were not included in Tan 8 and which in places are very close to the National Park boundary, as follows:
 - Area 2 for 'solar energy only' near Bryncir, Garndolbenmaen and Golan on the western boundary of the National Park.
 - Area 3 south of Colwyn Bay, which includes high ground centred on Bryn y Maen and also due east of Llanrwst. Additional turbines on high ground or extensive panel arrays could be clearly visible from viewpoints within the Carneddau area of the National Park and have a cumulative impact in the general area of the existing Moel Maelogen A Phase 2 windfarm.
 - Area 15, which extends 'Strategic Area A: Clocaenog Forest' on Map 2 in TAN 8 much closer to the National Park boundary -
 - (a) a substantial additional area for 'solar and wind energy' south west of the A5 centred on Llangwm, where turbines on higher elevation land could be clearly visible from within the National Park.
 - (b) a new area for 'solar energy only' which is even closer to the National Park boundary, just north of Bala and east of Frongoch.
4. Paragraph P12 on page 40 states that *'proposals close to the boundaries of National Parks and AONBs must demonstrate that the development will not undermine the objectives that underpin the purposes of the designation'*. We welcome this statement, but it's positioning on page 40 means it is unclear whether it is intended to apply to proposals inside as well as outside of Priority Areas. It should be made clear that it applies everywhere close to the boundaries of designated landscapes. Accordingly, the Society recommends that P12 is moved into Policy 12, where it will carry more weight than in supporting text, and edited to remove repetition and include the words in bold below:

*Policy 12 'Large scale on-shore wind and solar energy development is not acceptable within National Parks and Areas of Outstanding Natural Beauty. Proposals **inside and outside of Priority Areas** close to the boundaries of*

these designated areas must demonstrate that the development will not undermine the objectives that underpin the purposes of designation’.

5. The Society also recommends that the supporting text makes clear what is meant by ‘large scale’ wind and solar energy development and, by implication what ‘small scale’ of wind and solar energy may be acceptable in Designated Landscapes, depending on the material considerations in each individual case. We suggest that the lower threshold for ‘large scale’ should be defined in terms of the MW generating capacity of a particular proposal, and that this threshold should be agreed with national park planning authorities in Wales before the NDF is finalised.

Consultation question 9 on policies for the North Wales region, specifically Policy 22 on ‘North West Wales and Energy’ regarding whether Trawsfynydd in the heart of the National Park is to be identified as a potentially suitable location for one or more ‘Small Modular Reactors’.

6. Draft Policy 22 presumably refers to Wylfa on Anglesey and the Trawsfynydd site which is part of the Snowdonia Enterprise Zone (SEZ) and in the heart of the National Park.
7. The only specific mention of Trawsfynydd is at P22 on page 54 of the draft NDF. This states that *‘Trawsfynydd is currently being promoted by the Snowdonia Enterprise Zone Advisory Board as a potential site for a Small Modular Reactor, building on the existing sector-specific technical capacity and expertise available locally.’*
8. The Trawsfynydd SEZ site is already covered by Policy 27 of the recently adopted National Park LDP ¹. Policy 27 supports a range of employment uses including those *‘associated with nuclear decommissioning’* and *‘low carbon energy businesses and energy generation technologies’*. However, this policy does not explicitly and unambiguously support development of a new nuclear energy generating station of whatever size.
9. The Society recommends that the NDF should provide clarification on the following matters:
 - Whether a ‘small modular reactor(s)’ at Trawsfynydd would be a ‘Development of National Significance’ (DNS) determined by the Welsh Government or a ‘Nationally Significant Infrastructure Project (NSIP)’ determined by the UK Government.
 - Notwithstanding that a ‘small modular reactor(s)’ would be built on land already allocated in the LDP for *‘low carbon energy businesses and energy generation technologies’* and that it may be primarily a pilot or test facility, whether such development of clearly UK-wide significance would fall under

¹ https://www.snowdonia.gov.wales/_data/assets/pdf_file/0011/1689041/Cynllun-Datblygu-Lleol-V4.pdf
See Policy 27 on pages 98 – 99.

the definition of 'major development', in which case paragraph 6.3.6 of PPW10 will apply in determining proposals.

10. Great weight should be given to the statutory purposes of National Parks in preparing and determining any proposals for a new nuclear energy generating station at Trawsfynydd. Accordingly, the Society recommends that Policy 22 should be expanded to include the wording in bold below. This wording is already included in Policy 27 of the National Park LDP in regard to all development in the Snowdonia Enterprise Zone, but it is appropriate to also include it in NDF Policy 22 to make clear that it is the policy position of the Welsh Government regarding nuclear power development in a national park:

*In determining any applications for nuclear energy generating stations in the region, consideration should be given to the need for further non-renewable energy generation, their contribution towards Wales' energy mix, their impacts on the natural and historic environment and the economic benefits they would bring to the region. **At Trawsfynydd, any proposal should be of a design that responds positively to the sensitive landscape and visual setting and Special Qualities of the Snowdonia National Park.***

Llanbedr site of the Snowdonia Enterprise Zone

11. The Society notes that the joint response to the draft NDF from the three national park planning authorities in Wales calls for a reference in the NDF to the SEZ site at Llanbedr, as well as to the existing reference to the SEZ site at Trawsfynydd. The Society is not opposed to such a reference to Llanbedr at section P22 of the NDF and to Llanbedr being identified on the North Wales Region diagram on page 50, **providing** the reference makes clear precisely what type of economic development the Welsh Government considers would be suitable at Llanbedr and why that development would be so important in national terms that it warrants identification in the NDF in addition to identification in the local development plan.