

**From:** [Joy Sisley](#)  
**To:** [NDE](#)  
**Subject:** Draft NDF Consultation  
**Date:** 15 November 2019 12:30:36  
**Attachments:** [Meifod Community Council response.pdf](#)

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Dear NDF drafting team,

Please find attached Meifod Community Council's response to the Draft National Development Framework.

I would be grateful if you would acknowledge receipt of the attached document.

Kind regards,

Joy Sisley  
Vice Chair, Meifod Community Council



<b>Name</b>	Alan Williams, Chair
<b>Address</b>	c/o Mrs Cath Pritchard, Clerk [REDACTED] [REDACTED] [REDACTED]
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<b>Organisation</b>	<b>Meifod Community Council</b> <b>Meifod, Powys</b>

## **MEIFOD COMMUNITY COUNCIL SUBMISSION TO THE CONSULTATION TO THE DRAFT NATIONAL DEVELOPMENT FRAMEWORK, NOVEMBER 2109**

Meifod Community Council welcomes the opportunity to comment on the draft National Development Framework. We would like to make the following observations.

### **1. Chapter 3, Outcomes – Disagree Strongly**

The draft National Development Framework endeavours to interpret the Well Being of Future Generations Act (2015) in spatial terms and present a vision of development in Wales intended to deliver those goals.

While the NDF claims a “commitment to delivering sustainable development [that] will maximise its contribution to each of the Well Being goals” (p6) its outcomes and regional planning strategy construct a hierarchical approach to urban and rural development that conflicts with the Well Being Act and privileges cities and towns over rural communities. At the outset therefore, we consider the NDF is divisive and we wonder whether the authors have attempted to obscure this with meaningless jargon and feel good aspirations.<sup>1</sup>

The NDF spatial strategy is described as a “guiding framework for where large-scale change and nationally important developments will be focussed”. Regional and

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<sup>1</sup> “sustainable” is used 58 times in the document without any definition of what is meant in this context. “Development” is used 313 times in varying contexts. The collocation of “sustainable development” is used 4 times notably on p 22 where the authors assert “There is such a thing as too much development or the wrong type of development, whereas sustainable development should foster a stable or growing population to ensure a healthy natural environment and economic and social stability. “ [attention to punctuation would improve clarity]

Local Development Plans will be required to conform to the National Development Plan. It effectively removes local determination over policy affecting our rural communities and we think it disenfranchises people. Rural communities in mid-Wales are designated as Priority Areas for large-scale wind and solar energy development where there is 'acceptance of landscape change' regardless of its thriving agricultural and tourist economy (thanks to the beauty of our landscapes and open countryside) and historic local objections to such change.

**We propose the NDF outcomes should be rewritten to align more closely with the Well Being Act and contain a more diverse and inclusive understanding of 'development' that is appropriate to Wales as a whole. It needs to adopt a meaningful definition of 'sustainability' that takes full account of the material impact of its spatial framework.**

## **2. Spatial Strategy (policies 1-4) – Disagree Strongly**

The policies in section 1-4 (Spatial Strategy) privilege developments in housing, infrastructure and public services in urban areas. The NDF states, "Higher densities provide the necessary intensity of people and activity to animate streets and public spaces, support high streets and sustain good public transport services" (p26). The section on supporting rural communities is full of meaningless niceties, in which "The Welsh Government wants rural areas to sustain themselves and meet the needs of those living there" (p29). Are people living in rural Wales expected to finance road building and maintenance, improvements in broadband and telephone infrastructure, creation of accessible public services including hospitals, schools, community centres, libraries and museums, out of their own pockets? Whereas development in urban areas is a given, to qualify for support rural areas are expected to undertake a consultative development process and provide robust evidence based plans.

Powys is, suffering from chronic underfunding for public services. Its roads, many of which are minor and un-adopted roads, are crumbling due to lack of regular maintenance, its rural schools and libraries are closing, its Council Offices are understaffed and unable to meet the needs of the communities they serve. Large areas of Powys have no access to fast broadband or functional mobile networks. Members of the community are required to travel farther for health care, while public transport to health care centres is inadequate.

In our opinion, the NDF pays lip service to the difference between rural and urban areas and its authors manifest little understanding of the character of our rural communities. The people in rural mid Wales are cohesive and energetic with huge reservoirs of talent, endeavour, enterprise and skills. If the NDF does not consult with the communities of rural Wales to understand their needs and priorities, it reflects badly in terms of sustainable regional and rural policy within the document.

We conclude the NDF should include a robust policy that supports tourism, agriculture and other rural industries in the area by investing in a decent road and rail network, providing reliable broadband and mobile infrastructure, encouraging appropriate diversification in agriculture, protecting and improving bio-diversity and geo-diversity in our countryside, respecting its landscapes which sustain a thriving tourist industry, and investing in the development of rural enterprises that provide employment for young people so that they are not forced to move out of the area in search of work. This should include an approach to affordable housing policy that recognises the different needs of rural communities.

### **3. Renewable Energy (policies 10-15) – Strongly Disagree**

We are concerned that the Renewable Energy policy outlined in the NDF has no reliable evidence base to justify the Priority Areas for large-scale wind and solar development that will have a profound impact on our rural communities. While TAN8 has been widely derided and is now outdated, the creation of the SSA boundaries were subjected to a public consultation process and tested in relation to landscape sensitivity based on the LANDMAP for Wales. By contrast the ARUP studies used for the defining the PAs have downgraded all but the most sensitive areas (fixed constraints) as unsuitable for wind and solar development. The NDF does not take account of the Powys LDP RE policy, which is evidence based, extensively consulted, and properly tested for ‘soundness’. There were over 700 objections to an earlier draft, which proposed 600MW of new wind energy. Powys County Council took the evidence provided in these objections seriously and amended their policy accordingly.

The PAs for large-scale wind and solar energy and acceptance of landscape change are inconsistent with Planning Policy Wales and the Well Being of Future Generations Act. In a separate response to calls for evidence SP Energy Networks states, there is no grid capacity in mid Wales:

“Building on references in TAN8 and PPW, it is anticipated that the new NDF will include reference to the need for new grid infrastructure to support sustainable development. As such, reference is expected to be made in the NDF to the lack of additional grid capacity currently available in Mid-Wales to facilitate a development of this scale”.

The NDF fails to acknowledge the lack of available grid connection for any new energy developments in our area, or to discuss how the energy will be exported. As such there is no recognition of the potential impact on tourism from miles of pylons and cabling criss-crossing our countryside. Nor does it consider the impact of transport of turbine parts, or site construction traffic on our crumbling roads.

We believe the Welsh Government’s proposals for renewable energy directly contradict its commitment to improving the biodiversity of rural areas, supporting agriculture and protecting our landscapes, which are ‘amongst the best in the world’.

The European Climate Change Programme Working Group Sinks Related to Agricultural Soils<sup>2</sup> reports Carbon sequestration in agricultural soils has a potential to significantly contribute to climate change mitigation. They also comment on the high value of grassland as net carbon sinks. NRW's State of Natural Resources (SoNaRR) report 2016 acknowledges over 80% of soil carbon stores in Wales are associated with upland and grassland soils. 74% of Welsh farmland is grassland, while the National Union of Farmers Wales claims not only is the climate impact of Welsh grazing amongst the lowest in the world but also Welsh farmland conserves important carbon stocks in Wales' uplands. It is therefore regrettable that the draft NDF consultation only precludes Renewable Energy Priority Areas on Grades 1 & 2 (but not 3a) farmland. Given the importance of the potential for climate change mitigation through carbon sequestration in its upland soils we have grave concerns about the potential for environmental degradation in these areas and consider it regrettable that this has been overlooked in the NDF in the rush to define large parts of Powys as suitable for large scale wind and solar energy development in the name of climate crisis mitigation.

Farms and properties in the Meifod valley have been routinely affected by flooding, putting both people and livestock at risk. Much of the soils in the areas proposed for major wind energy development in PA5 consist of slowly permeable clayey soils. Filling these areas with vast concrete pads and covering them with impermeable tracks will increase run-off and heighten the risk of flooding.

The Welsh Government cannot be unaware of the strength of opposition by communities in Montgomeryshire to the construction of grid connection through the area with resulting destruction of its historic heritage.

**We propose the RE policy be removed altogether from the NDF and developed as a new TAN that takes account of advances in renewable energy technologies, considers an appropriate mix of renewable energy generation that serves and is acceptable to local communities, and include adequate consultation with host communities. The conflation of renewable energy policies and decarbonisation is unhelpful. Renewable energy generation should not be used to offset carbon footprints in other domains.**

**The NDF should give more emphasis to carbon sequestration methods through tree planting, restoration of degraded soils, promoting and supporting improved farming practices.**

#### **4. Low Emission Vehicles (policy 7) – Strongly disagree**

While we applaud the commitment to reducing carbon emissions through the increased use of electric vehicles, little thought has been given to the logistics of running electric vehicles in rural areas and access to charging infrastructure. People who live in remote areas will necessarily be reliant on private fossil fuelled transport

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<sup>2</sup> [https://ec.europa.eu/clima/sites/clima/files/eccp/second/docs/finalreport\\_agricsoils\\_en.pdf](https://ec.europa.eu/clima/sites/clima/files/eccp/second/docs/finalreport_agricsoils_en.pdf)

for the foreseeable future. This policy is yet another worthy aspiration with no real substance.

**We propose the NDF should promote an active plan for improving reliable and frequent public transport and rail networks in rural areas such as Powys.**

## **5. Mid and South West Wales (policies 23-26) – Strongly disagree**

This region is the largest of the three regions in the NDF. By its own admission, this is really two distinct regions:

- “This large and diverse region includes some of the most rural and sparsely populated parts of the UK, and the urban, industrialised areas around Wales’ second city, Swansea.” (p14)
- “The size and diversity of this region ... means that the region does not have the degree of interconnectedness of other regions. From a high level national perspective, there are two broad spatial sub-regions. (p56)
- Maps of the region show East-West connectivity with Aberyswyth and coastal areas in the West and England to the East and further connections to the North. There are no natural connections with the Swansea Bay area.

According to the NDF Spatial Strategy, growth will be focussed primarily on the coastal towns and cities in the South. We are concerned that this means Welsh Government has consigned rural Wales to stagnation with no support for development. We note that Powys, is not mentioned further in this section with the exception of a passing nod to the location of key services and infrastructure which are to be “located in the most accessible and sustainable locations” (p58) and the opportunities of functional relationships with England in the Eastern part of Powys. England is viewed as a source for employment and other economic opportunities rather than seeking to encourage those in Powys itself. We wonder, therefore, whether Welsh Government expects Powys and the people therein to be vassal servants to English jobs and industry, giving up our skills and services that Welsh Government would ignore.

Elsewhere Powys is to be exploited for the extraction of sandstone and igneous rocks (p60) and wind (p60).

While the NDF asserts, “planning applications should ... ensure that all communities across the region are able to benefit from their landscapes, natural and historical environment and heritage assets” (p60), it is silent on its commitment to a “presumption in favour of large scale on-shore wind and solar energy development ... and an acceptance of landscape change” in this area (p36).

There is no mention whatsoever of our agricultural industry and its contribution to Wales' economy. Farming businesses in our ward consider that a major oversight and weakness in the NDF.

In conclusion the NDF is primarily an urban development strategy in which rural Wales is seen merely as a resource to service the development priorities of urban areas. This is unacceptable to us in the Meifod ward.

**We would like to see the following included in the NDF:**

### **Spatial Strategy**

- the NDF should identify 4 regions – North Wales, Mid Wales, Swansea Region and Cardiff Region
- the NDF strategy must not adopt a one-size fits all approach. Different solutions are required for different areas. Urban responses to issues should not uncritically be applied to rural areas
- the NDF strategy must recognise parts of Wales are very different from each other. It is recognised urban and rural areas are different. It must also be recognised there are often very significant differences between different rural parts of Wales.

### **Economy (including Tourism, Rural Economy and Agriculture)**

- when considering proposals for the NDF, their impact upon tourism must be fully understood and assessed. It is important that the pursuit of one objective does not unintentionally damage the tourism sector

### **Transport and Connectivity**

- rural transport is a major issue across Wales and the NDF should ensure this is addressed

### **Natural Environment**

- landscape and the natural environment are fundamentally important to the Welsh tourism economy. The NDF should ensure that changes to the landscape are carefully assessed and managed and negative impacts prevented. The impacts can be economic as well as environmental
- management of the natural environment and landscapes are intrinsically linked to farming. The NDF must ensure that the objectives seeking to protect, manage and utilise the natural environment are aligned with objectives for agriculture

Alan Williams, Chair  
Meifod Community Council  
Powys

Mrs Cath Pritchard, Clerk

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