

**From:** [Cllr Frances Buckingham](#)  
**To:** [NDE](#)  
**Subject:** Welsh Government's Draft National Development Framework Consultation  
**Date:** 13 November 2019 12:54:32  
**Attachments:** [National Development Framework response.pdf](#)

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I attach a response to the Welsh Government's Draft National Development Framework Consultation on behalf of the North Montgomeryshire Local Councils Forum, of which I am chair.

We have no objection to this response being made public and I trust that, as with previous consultations, you will be publishing a summary of responses in due course.

The Forum is currently without a secretary therefore if you require any further information on the views of the Forum on this matter, please contact me.

Frances Buckingham

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Community Councillor (Llandysilio)

Chair of the North Montgomeryshire Local Councils Forum

preferred contact by email to

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# North Montgomeryshire Local Councils Forum

## Response to the draft National Development Framework consultation

The North Montgomeryshire Local Councils Forum has considerable concern at the nature of the consultation and the democratic deficit of the process and the proposals:

- consultation must be formative and should provide options for consideration;
- according to the Gunning principles, adequate time must be given for consideration and response. This consultation opened on 7 August 2019, a month when many Town and Community Councils do not meet, effectively reducing the initial consultation period by some four to six weeks, mitigated somewhat by the subsequent two week extension to the deadline for responses;
- all stakeholders should be fully engaged. There has been no engagement at all regarding the far reaching Renewable Energy proposals and we are particularly concerned at the lack of consultation with, or information flow to, the AM for Montgomeryshire, Russell George;
- there is no strategy behind most of the proposals just broad brush comments with which we would generally agree. In the absence of substantive proposals it is impossible for meaningful comment to be made.

### **Policies 1-4**

Three City-based administrative regions are proposed with Powys subsumed into a South West and Mid Wales Region centred on Swansea and Llanelli. There is no rationale for this given the lack of shared area or economic characteristics and no interconnectivity.

A region of this size and description encompassing the deeply rural and the completely urban will, inevitably, lead to further marginalisation and diminution of local democracy in Powys. Interestingly the evidence base prefers a four Region model with Powys as a distinct and distinctive Central Eastern Region that to a considerable extent looks east to England for health care, export markets and secondary/tertiary education. We see this as the pragmatic approach that will allow proper consideration to be given to rural communities and their economic development.

Regional administration introduces Strategic Development Plans, a further layer of planning bureaucracy beneath the NDF. These will almost certainly override and further erode democratically formulated Local Development Plans. LDPs are carefully considered at Town and Community Council level since it will be local residents and businesses who will be most affected by the policies resulting from them. Development of a SDP for a South West and Mid Wales Region as proposed will inevitably disadvantage Powys given the weight of population and need in the metropolitan areas to the south of the proposed region.

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### **Policies 10-11**

The NDF introduces the largest land use change ever seen in Wales (or the UK) yet is based on deeply flawed evidence and an analysis which, perversely, excludes vital considerations such as:

- different renewable generation options;
- availability of Grid connection;
- the importance of upland ecosystems;
- impacts on the vital tourism economy;
- wind speeds;
- access for construction.

Without consultation or public mandate it states there will be 'acceptance of landscape change'. The Priority Areas cover some 20% of the land mass of Wales and the industrialisation of our landscapes will potentially be observable from nearly every vantage point in the country including designated landscapes. Quite what the benefit to the Welsh population of this extensive redevelopment will be is unclear.

Taken together Policies 10 and 11 effectively mean that wind and solar development is virtually pre-determined anywhere outside of AONBs and National Parks, and that all planning protection is effectively removed.

On-shore wind is rapidly being superseded by off-shore technology, generation capacity, carbon footprint and employment opportunities and adverse environmental and community impacts are largely avoided. Wales should be giving its attention to off-shore potential and the development of servicing facilities.

There are no cogent proposals for reducing energy use and Cardiff airport is set to expand exponentially. Overall the carbon footprint of development of the proposals for on-shore wind (and associated carbon intensive industries) are likely to mean Wales increases its output of CO<sub>2</sub>. It is of concern that only de-carbonisation is being considered in the NDF. There are many other issues impacting adversely on climate change and sustainability.

### **Conclusion**

The North Montgomeryshire Local Councils Forum considers that the NDF as it currently stands is not fit for purpose and should be withdrawn.

- 1 The NDF lacks any of the expected substantive plans for transport, health or education and falls well short of meeting any of its stated outcomes. It appears mere window dressing for a wind/solar policy.

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- 2 The NDF is completely undemocratic as it takes no account of the local LDPs. Powys has a clear Landscape Policy which unequivocally recognises the overriding importance of landscape to the rural economy and community well-being. The LDP also assessed, taking all pertinent factors into consideration, there was very little scope for further development of wind energy in Powys.
- 3 The Renewable Energy policies should be separately, extensively and meaningfully consulted following the Welsh Government's own guidelines on consultation.
- 4 There are many sound but embryonic policies within the NDF that require the development of a robust evidence base on which to propose a framework for implementation.
- 5 If a Regional Administrative model is to be preferred, then we would strongly urge this is most appropriately a four region model and that the NDF encompasses how the regional approach will deliver the aspirations of the NDF.

To be successful the NDF must engage with communities, obtain their support and demonstrate the aim is an equitable Wales for all.