

From: [Clerk Montgomery Wales](#)
To: [NDE](#)
Subject: Response - NDF Consultation
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Attachments: [NDF Res.doc](#)

Please find attached response from Vale of Montgomery Rural Cluster.

Regards

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Town Clerk

DRAFT 2

1. NDF Outcomes

The 11 stated outcomes are ambitious and laudable but undeliverable for all communities by the NDF as it currently stands. The two major proposals are in direct conflict with achievement of the aims.

The NDF is largely silent on the rural 2/3rds of Wales as exemplified by Outcome 5 : '*A Wales where people live in towns and cities which are a focus and springboard for sustainable growth.*'

This is dismissive of the huge economic and well being contribution of rural Wales with vibrant and cohesive communities, agriculture and entrepreneurial businesses. The NDF as a whole reflects an inability to value and nurture the rural economy and a lack of understanding of landscape, the environment and ecosystems potential, its people and heritage.

2. Spatial Strategy

The NDF sadly fails in many respects to meet expectations, for example in the omission of a strategic plan for developing transport or health infrastructure or the Further / Higher Education sector to best serve all the communities of Wales. It appears to be little more than window dressing for the largest land -use change plan ever envisaged and a Regional Administration based on cities, with which many rural areas have no real relationship, to continue the steady erosion of local democracy.

The spatial strategy and key principles contain some necessary and proportionate policies for the regeneration and sustainability of urban areas. It appears the desired outcome for rural areas is de-population given the lack of proportionate infrastructure development and designation of over one quarter of rural Wales as Priority Areas for wind and solar farms.

VMRC strongly agrees that '*the future for rural areas are best planned at the local level and that democratically produced LDPs should plan positively to meet the needs of rural communities with regard to housing, businesses, local transport services and diversification in the agricultural sector*'. This is not reflected in any part of the NDF or any indication given that appropriate funding will be made available to Local Authorities (e.g.

through devolved business rates) other than in the two Powys Growth Zones. Tourism and leisure are identified as growth areas (also recently reiterated by Farming Connect stating that there is great potential for 'farm tourism' and that Wales can be 'the destination of choice'). This aspiration is clearly incompatible with large scale renewables and transmission infrastructure.

The NDF fails to refer to the existing Mid Wales Growth Deal¹ which identifies defence & security; animal health & veterinary science; bio-technology and agri-tech for development. The Spatial Plan takes no account of the actual Powys economic situation so the proposed Administrative Regions will make targeted, appropriate growth strategies implausible.

The division proposed by Cardiff University research with Powys as a free standing Central Eastern Region has considerable merit if a Regional model is preferred.

A three tier administrative and planning system (SDPs) will add bureaucracy and expense as well as, inevitably, undermining local democracy as reduced weight will be given to publicly consulted and examined LDPs and a fair and transparent planning system.

3. Affordable Housing Policy.

There is a need for affordable housing in all areas of Wales, urban and rural. VMRC agrees with the approach to increasing affordable housing although failing to see strategies in place to achieve this ambition through the various agencies.

4. Mobile Action Zones

VMRC applauds any policy to improve mobile phone and Broadband coverage across Wales.

Recent moves by mobile phone companies to site masts inconspicuously on buildings such as churches and to pay a rental for this facility is working well and has facilitated coverage in a number of locations without impact on the built environment or landscape.

5. Green Infrastructure

Measures to maintain and enhance biodiversity and ecological networks are essential particularly as we continue to lose more species than any other country and the latest

¹ City Deals and the Regional Economies of Wales - Economy, Infrastructure and Skills Committee 2017

report² gives no cause for optimism. Wales could be a rich source of varied habitats, wildlife corridors and sustainable eco systems. Post Brexit Agriculture payments for eco-services could be instrumental in achieving this outcome.

Yet again there is insufficient detail to assess whether the NDF could achieve essential connectivity. Areas should be identified for targeted and supported mixed afforestation across Wales and a principle of support for small as well as larger schemes.

The NDF exhibits inherent conflict with the ambitions for on-shore wind turbines requiring significant quantities of concrete which destroys fragile upland ecosystems (as we can already see at Tranon Moor and Cefn Croes). Industrial scale solar 'farms' result in a rank monoculture and are again contraindicative to planting schemes. The Priority Areas avoid Internationally designated sites but are careless of SSSIs and Local Wildlife sites vital to species survival and essential connectivity. Industrialisation of a quarter of rural Wales is antithetical to enhancing biodiversity.

7. Renewable Energy

VMRC seriously questions designating areas with a presumption in favour of development of large wind and solar industries across one quarter of Powys (outside of the Brecon Beacons). The introduction of a major land use strategy without a fully transparent, meaningful and in depth consultation with the public, elected representatives, Local and Minor Authorities is inexplicable and undemocratic given the far reaching consequences.

- there is no public mandate to accept landscape change of this magnitude.
Landscape is a vital resource and belongs to all;
- the Arup TAN 8 exercise identified different search areas for wind developments.
Which do we believe ? ;
- the designation of SSAs and a Mid Wales Connection project has blighted large areas of Powys for the last 15 years. This exercise blights an even larger area with all the attendant economic and personal impacts;
- turbines are now well over three times higher than those envisaged in TAN8 so visibility will be much greater and their presence more dominant in the landscape. This has not been considered. A three times greater buffer zone from residential property will also be required (i.e. 1500m);
- a proportionate response would require each Authority to produce sufficient renewable energy to meet its own electricity needs through a combination of energy saving measures (not mentioned in the NDF) and a mix of appropriate renewables.

Powys currently produces 80%.

- Grid availability or capacity was assessed but not taken into account;
- applications will be determined by the WG under DNS and LPAs relegated to mere statutory consultees There is a serious democratic deficit.
- each LPA has produced an LDP and each has commissioned research to inform their renewable energy policy. No account has been taken of these local policies in defining PAs. LDPs are democratically prepared and publicly examined documents going through several iterations and major revision based on consultations. It is a travesty of local democracy and transparency to disregard them;
- the small landmass of Wales and the wide distribution of its communities makes large scale on-shore wind and solar development inappropriate;
- the core principle of resilience in economic/regeneration strategy is diversity. No one industry should dominate or temporarily skew a broad based economy;
- a protracted period of upland industrialisation may provide temporary construction jobs but all research shows that wind provides few permanent jobs and little benefit to a rural economy unless there are local supply chains and turbine manufacturing. Wales and the UK are far behind in on-shore wind technology and there is no manufacturing industry;
- there is, however, a strong and growing all year round tourism industry. In Montgomeryshire much community infrastructure and business depends heavily on visitors. Every survey produced by Visit Wales shows visitors come for peace, tranquillity and the far reaching unspoilt and varied landscapes not disturbingly moving 250m high turbines, fields of solar panels and transmission infrastructure. The extent of the PAs is such that there will be no high ground from which turbines will not be visible (including much of the Brecon Beacons);
- both small settlements and larger villages and towns are impacted by PAs so many lives and livelihoods will be affected;
- the impact on, and carbon storage potential of, upland ecosystems;
- the lack of account taken of access routes to remote rural locations. The report prepared by Capita Symonds³ for the WG indicated grave concerns regarding the community and infrastructure impact of many years of windfarm construction. Community Council experience demonstrates the unlikelihood of highways damage being rectified leaving a substandard road system.

3 Capita Symonds Wind turbine transport in Mid Wales 2007 (for WG and Powys CC) 2010 (for Powys CC)

- The NDF is silent on the potential for off-shore wind with the ability to produce more and less expensive energy without impacting communities, landscapes and upland ecosystems. Another coup;e of off-shore facilities the size of Gwynt y Mor would ensure Wales met its 2030 target without despoiling vast tracts of beautiful rural Wales and adversely impacting on rural communities and biodiversity.
- planning blight is a serious issue in, or proximate to, SSAs. PAs cover larger areas, have certainty of development and are close to villages and towns so significant impacts on residents and investment, particularly for tourism related enterprises, can be expected;

The NDF repeatedly contradicts itself reflecting the dichotomy of thinking. On one page one can read '*By focussing large scale growth in the urban areas, development pressures can be channelled away from the countryside and productive agricultural land can be protected*'. At the next, one quarter of rural Wales, landscapes and agricultural land is being designated for industrialisation.

10. Mid and South West Wales

The South West and Mid Wales proposal is simply too large and diverse and demonstrates none of the required parameters of infrastructure links; travel to work lines or shared characteristics. Looking at the current economic indicators there is no correlation between the Swansea, Llanelli, Neath, Port Talbot areas and rural Mid Wales or our towns. There are even considerable differences between Pembrokeshire and Carmarthenshire and most of Powys. Powys has: statistically full employment, large numbers of self-employed, the best business start up retention rate and highest skills levels in Wales, a strong and highly entrepreneurial SME sector and an economy where the greatest share of GDP comes from tourism, agriculture and forestry. The strategic plan for growing and sustaining Powys prosperity and well being must be area specific. Additionally, Powys businesses tend to look east to the West Midlands and international trade and neither the population or economy relates to the cities of South Wales.

At consultation events thinking on SDPs / LDPs appeared unclear and based on various ill defined and untested models. This confusion is unsurprising as it is evidently arising from attempting to implement an unwieldy three Region model focussed on urban needs and aspirations. It is essential that different approaches are taken. Rail infrastructure strategy must be nationwide to be coherent for example whilst conceivably Powys and Ceredigion

could usefully work in partnership on a FE / HE strategy. The flexibility to form appropriate partnerships is far more valuable than some rigid ideological grouping without any rationale.

The VMRC would like the WG to consider where Town and Community Councils sit within this structure. The Independent Review Panel concluded they should have greater powers and every community should be represented by such a body. This should be reflected in the NDF as key to the well being of communities. Well being is inextricably linked to empowerment and it is local people understand their community and its needs. Introducing a further layer of Regional bureaucracy will further dilute the voice of communities, especially where that community is culturally and economically divorced from its 'City'.

VMRC considers there is merit in the four Region model preferred in the evidence base with Powys forming a distinct Central Eastern Region that would, indeed. Have some commonality of characteristics.

15. Additional comments

VMRC members have grave concerns that:

a) the opportunity to put in place strategies for health, education and transport that could support the proposed outcomes has been completely missed. This is a strategy for urban growth that ignores the richness of the rural economy, heritage, cohesive and resilient communities and potential for ecosystem services through peatland management and woodland planting.

b) this will not be a meaningful consultation that will result in review and change. It is inappropriate that this draft is the document that will go forward for scrutiny by AMs as it stands and with only an appendix of consultation responses. There is a considerable amount of work yet to be done to make this document fit for purpose and this consultation must form part of an iterative process and the current timetable is untenable given this requirement. This is the first occasion that any real proposals have been put forward in the process so far.

c) no detailed consideration has been given to any form of RE other than on-shore wind and solar. Off-shore wind could easily meet energy targets yet has not been considered (or any cross-reference made to a Marine Strategy). The NDF also lacks consideration of energy reduction and saving or community energy schemes (local energy not buy-in) yet,

perversely, plans to steadily increase the capacity of Cardiff airport.

d) how the soundness of the NDF will be properly and publicly tested. The ISA submitted with the NDF is amorphous and lacking criteria for proper scrutiny for a proposal with such far reaching consequences. An LDP has a fairly rigorous evolutionary and examination process; here we have a major land use and administrative change proposal that must surely and publicly answer the same questions as an LDP:

Does the plan fit? (with other legislation)

We are told legislation will be changed ('policy levers') to fit the NDF so this test of soundness is questionable.

There are contradictions with PPW10 in terms of protection of landscape and with the Powys LDP which unequivocally recognises as a foremost principle that landscape is the County's greatest resource. Through LDP policies and the Landscape Supplementary Planning Guidance a raft of measures are put in place to protect this precious and finite resource. It also conflicts directly with both the Well Being of Future Generations Act in failing to protect such an invaluable resource and the European Landscape Convention whose tenets are designed to ensure the importance of all landscapes to communities is recognised and respected. Soundness test failed.

Is the plan appropriate? (locally specific, addressing key issues, supported by robust evidence, clear rationale, real alternatives considered, logical, reasonable & balanced...

It fails completely to meet the deeply rural and infinitely varied characteristics of Wales and Welsh economies.

Cardiff University research identified 4 administrative regions as the preferred model yet was subsequently ignored.

The Arup research conflicts with their own earlier work and with analysis and assessment carried out by Aecom for the Powys LDP which determined there was no further capacity for wind development. It fails to take into account a number of critical constraints and is hypothecated on a flawed logic. The many basic errors in the report give it very little overall credibility. Real alternatives are not properly considered and there is certainly neither logic, proportionality or balance displayed. Soundness test failed.

The lack of consultation in the development of the PA proposals (even with Local Authorities and AMs) yet again underlines the paucity of consideration of locally specific issues in a logical, balanced and democratic manner. The immensity of what is proposed makes this omission remarkable and shows a complete disregard for empowerment that sits uneasily in a supposedly democratic Wales.

Will the plan deliver? (can it be implemented, is there support from relevant infrastructure providers both financially and in terms of meeting time scales, is it flexible, is it monitored effectively)

No infrastructure providers have been consulted on the energy or housing proposals. In terms of PAs this major flaw has led to unachievable area designations and damaging uncertainty for communities and developers. The imposition of SDPs and a pre-determined presumption in favour of construction allows for no flexibility and is antithetical to the principles of planning. There is no indication of how, or if, the NDF will be monitored, reviewed and amended if stated outcomes are not being achieved. Soundness test failed.

In conclusion VMRC would reiterate serious concerns that any of the outcomes can be delivered by the strategies as outlined in the draft NDF and indeed consider that in a number of cases the measures proposed will be counterproductive.

There is a necessity for a widespread and separate consultation with all stakeholders, including communities, Minor and Local Authorities, landowners, Wildlife Trusts, Archaeological Trusts etc. on the designation of Priority Areas.

The NDF needs to consider a whole raft of public services as well as agriculture and the potential for woodland planting for decarbonisation and species diversity.

Greater consideration needs to be given to a four Region administrative model with devolution of responsibility and budgets from the WG.

At minimum the NDF needs to be able to meet the tests of soundness identified for LDPs and to ensure adherence to the principles for meaningful consultation.