

From: [Robert Cayzer](#)
To: [NDE](#)
Subject: Draft National Development Framework: Consultation Response
Date: 29 October 2019 13:50:03

Sirs

I wish to respond to the Welsh Government's consultation on the draft National Development Framework 2020-2040. Please acknowledge receipt of this response.

My comments primarily concern the proposals for wind and solar energy in priority areas. **I do not support the proposed priority areas and the Welsh Government's proposed policies for large onshore wind farms.**

The Welsh Government has proposed concentrating large scale onshore wind farms in a small number of areas and giving them the green light with a presumption in favour of development. The Welsh Government is consulting on these proposals with only **vague source maps** provided in the consultation document which do not adequately give people sufficient information by which to consider the proposals and the impact that they will have on those areas. **This cannot therefore be considered a fair consultation and, subject to the outcome of the consultation, there must be further consultation on detailed proposals that give people the opportunity to understand how they will be impacted by them.**

The Welsh Government proposes that the National Development Framework should concentrate large scale onshore wind farms in a small number of priority areas. However, this is **at odds** of the approach elsewhere in the development to focus sustainable development around three nationally significant centres (Cardiff, Newport and the Valleys; Swansea Bay and Llanelli; and Wrexham and Deeside). **The National Development Framework should instead focus its energy policies/priority areas in the three nationally significant centres, focussing energy production where it is needed most.**

The Welsh Government's National Development Framework's proposals for large scale onshore wind farms fail to sufficiently recognise and protect the environment and landscape. **The National Development Framework focusses on decarbonisation at the expense of the wider environment and landscape.** Indeed, National Development Framework Outcome 2 includes "A balance will be found between development and preserving the character of rural Wales". Outcome 10 also seeks to protect biodiversity and habitats. These outcomes are therefore inconsistent and contradictory to Outcome 11 and policies and proposals for large scale onshore wind developments. The National Development Framework should better recognise the impact that such large scale onshore wind farms have on the environment and the landscape. Consideration of any large scale onshore wind farm developments must properly consider their specific impact on the environment and landscape. **The National Development Framework should not provide a green light and presumption in favour of large scale onshore wind farm developments in priority areas, instead any proposals must be considered on their merits, including consideration of the impact on the landscape and environment.**

The Welsh Government's National Development Framework has no consideration to the needs and views of local communities. Instead the **National Development Framework rides roughshod over Local Development Plans** that have been put in place by democratically elected local planning authorities after detailed and lengthy engagement and consultation with local communities. Indeed, rather than allowing local communities, through their local authorities, to make policies and decisions that best reflect local need

and circumstances, the Welsh Government is centralising decision-making on large scale onshore wind farms, giving local communities no say over developments that will have significant impact on their lives. Instead, **the National Development Framework should require local planning authorities to set out policies and preferred locations for development, including onshore wind farms, in Local Development Plans. The National Development Framework should also raise the threshold at which large onshore wind farm development proposals are decided by Welsh Government ministers, devolving decision making to local communities.**

The Welsh Government's National Development Framework proposes that communities should be "protected from significant **cumulative impacts**" from large onshore wind farms. **The National Development Framework should place greater weight on the cumulative impact - not just "significant cumulative impact" - of wind farm developments on all communities - not just small settlements - and the Welsh Government should consult on any such proposals.**

The Welsh Government has committed to producing further **guidance** on the development of onshore wind developments in priority areas. **Such guidance must be given such force that developers must comply with it and the standards set out. There must be proper consultation on any draft guidance, and it must reflect latest research in the impact of noise and flicker/light disturbance on households, minimising the impact of any such wind developments on householders.**

Mr R Cayzer