

**From:** [REDACTED]  
**To:** [NDE](#)  
**Subject:** My consultation response to the Draft National Development Framework  
**Date:** 15 November 2019 20:44:13  
**Attachments:** [NDF response\\_Richard Thomas\\_Final.pdf](#)

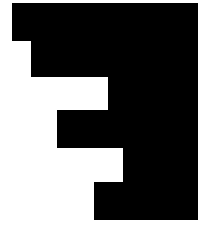
---

Hello

Please find my consultation response attached.

Thankyou

[REDACTED]



14<sup>th</sup> November 2019

Dear Sir/ Madam

**RE: Draft National Development Framework**

I am writing in response to the consultation on the Draft National Development Framework, specifically the section on renewable energy, pages 36 to 42.

I completely agree that decarbonising our energy system is of national importance. It is something I have been passionate about for a long time having personally invested in small scale solar through the Feed in Tariff and been promoting small scale renewables through various projects since 2006. I in-fact bought my first solar panels in 1995 so have a long standing interest in this area. Therefore I am very pleased to see that the Welsh Government is proposing to lead the way on tackling climate change and decarbonising the energy sector.

I do believe though that an issue as crucially important as climate change is biodiversity loss, and I am concerned that the proposals in this document are not giving equal weight to these two concerns. We must halt any further biodiversity loss and strive in everything we do to recover our natural ecosystems, species and habitats. Therefore I have huge concerns about the overriding presumptions in this document, that there will be a presumption in favour of large scale on shore wind and solar energy, with an acceptance of landscape change, in priority areas, as that would inevitably come with further biodiversity loss.

Therefore I have a few general concerns about the consultation that I address below:

- i) Potential loss of biodiversity
- ii) Lack of evidence and comparison with other renewables
- iii) Thoroughness of the consultation
- iv) Poor Methodology
- v) No mention of what happens next – the process
- vi) No indication of how these developments will be brought forward
- vii) Lack of Welsh companies who install large scale solar and wind energy
- viii) Lack of democracy, centralisation of power away from rural communities
- ix) Devaluation of property

And then I address some concerns about Priority Area 7 on page 5-9.

i) Potential loss of biodiversity

The State of Nature Report 2019 and many other scientific reports and papers have described the perilous situation our UK wildlife is in, and it is imperative these declines in biodiversity are reversed. There are signs of hope, the Welsh Government consultation 'Sustainable Farming and our Land' could bring a major change in land use across Welsh farmland, which accounts for 88% of the land in Wales. It would be a serious clash of policies if one department in Welsh Government acted to increase biodiversity and the National Development Framework brought about further declines in biodiversity.

There are some European Protected Sites and SSSIs within the Priority Areas. Connectivity between designated sites and priority habitats also needs to be considered. There will also be European Protected Species listed on Schedule 2 of the Habitat Regulations within the priority areas.

Also it has been widely recognised that just protecting our wildlife reserves will not do enough to recover habitats and species – it hasn't worked up to now. We need a wholesale change in farming practises to improve all farmland habitats and species, not just around the edges of fields in hedgerows and margins. By the same principle we do not want to see further loss of habitats and species caused by large scale energy developments.

Large scale wind farms bring large concrete areas for the foundations, service areas, trackways, possible road widening and straightening, and pylons to move this energy around. This then brings with it a creeping industrialisation as once there is a development of one sort in an area a second development is much easier to get planning for, and this incremental change will have a significant impact on the biodiversity of an area.

ii) Comparison with other energy sources/ energy policy

Whilst stating in Policy 13 that other renewable energies will be supported in principle, this document seems to automatically favour large scale on shore wind and solar whereas there are other options to have in the energy mix:

- Offshore wind
- Wave power
- Tidal power
- Geothermal electricity
- Hydropower
- Storing energy, pumped storage, batteries, heat storage
- Micro solutions under the Feed in Tariff (FIT) were generally without landscape issues as on a smaller scale,
  - farm scale turbines,
  - domestic solar installations,
  - microhydro

they produce power where it is needed.

Off Shore Wind

I understand historically on shore wind has been approximately half the price to install than off shore wind, for example in 2011 onshore wind costs at 8.3p/kWh had fallen below new nuclear at 9.6p/kWh, though it had been recognised that offshore wind costs at 16.9p/kWh were significantly higher, mainly due to the cost of getting the power to the grid.

However it is my understanding that the cost of offshore wind has plummeted by about 30% in the last two years. In the latest round of the 'Contracts for Difference' in 2019, about 6GW of clean energy from off shore wind is to be added to the grid by 2025 at around £47/MWh at 2019 prices; the first round that prices were lower than current generation costs.

Therefore off shore wind is becoming much more competitive and does not have the associated risks to biodiversity, landscape, tourism associated with on shore wind.

Zero Carbon Britain produced a report in 2010 'Zero Carbon Britain: Rethinking the future'. In it they model how the UK could produce all its energy supply from zero carbon technologies. In their model Offshore wind energy alone provides nearly half (530 TWh per year) of the total energy required. They state that the greatest potential to capture the wind is out at sea:

*'Onshore wind: Turbines are easier to install, but as wind speeds are lower over land they produce less energy.*

*Offshore wind: Out at sea wind speeds are higher. There are also fewer objections to putting very large wind turbines far away from where we live.*

*Where the sea is relatively shallow – the current limit is depths of 40-60 m – it is possible to build fixed turbines with foundations in the seabed. All existing commercial offshore wind farms are of this type. It has been estimated that the amount of energy we could produce from installing fixed offshore turbines is around 400 TWh per year (Offshore Valuation Group, 2010), more than the UK's current total electricity consumption (320 TWh in 2010). This would require more than 10,000 large fixed offshore turbines. Most of these turbines would be in the North Sea, where very large shallow sandbanks, like the Dogger Bank, could accommodate huge wind farms.*

*Where the sea is too deep for fixed foundations it is possible to use floating turbines that are anchored to the ocean floor by cables. The Offshore Valuation Group (2010) report estimates that we could produce more than 1,500 TWh per year from floating wind turbines alone – this is close to the UK's energy demand in 2010 (1,700 TWh).'*

When discussing solar photovoltaics the report states: 'Solar panels can be used to produce electricity (solar PV) or heat (solar thermal, or 'solar hot water').

*South facing roofs are ideal but east or west facing roofs can also be suitable for either technology. The total potential for energy generation is large if all roof areas in the UK are considered; it has been estimated that solar panels on UK roofs could produce 140 TWh of electricity and 116 TWh of hot water every year (DECC (2010) 2050 pathways, level 4). Solar farms in fields could theoretically produce even more energy, but they could compete with other land uses, such as food production.'*

Therefore when combined with off shore wind, wave and tidal power, solar power on roofs, geothermal and hydropower we simply do not need a massive expansion in on shore wind and solar farms.

I am struggling to understand how this consultation doesn't do a cost benefit analysis of the various options – it is just not evidence based.

Furthermore if a natural capital approach was taken to calculate all the costs incurred, with the full environmental costs being considered I am confident that on shore wind and solar farms become less sustainable and much less economically viable compared to off shore wind.

iii) Thoroughness of the consultation

I would like to say that I don't think a good job has been done about making people aware of this consultation. I only found out about the process at the very end of October and when I brought it to the attention to the members of a meeting in Painscastle on the 31<sup>st</sup> October,

no one out of the 20+ people in the meeting had heard about the consultation. This isn't great considering Painscastle is right in the middle of priority area 7.

iv) Methodology

The scale of the mapping presented in the reports is not particularly helpful, it makes it difficult to identify exactly what would be in each priority area due to the map scale.

The method used by Arup of classifying fixed and variable constraints seems flawed. Priority areas contain variable constraints such as outstanding landscapes, peat deeper than 45cm, National Nature Reserves, open-access land.

I understand this is meant to be a high level approach but it has missed out many factors and included environmentally sensitive areas that should not be in priority areas. Once areas are designated for development it will be much easier for damage to these sensitive areas to occur.

v) The process

I do not think the process that this consultation sits within has been explained sufficiently for the lay person to enable a full response, for example

- what happens next?
- will there be a further consultation, or responses produced to this draft?
- when might the framework be implemented?
- do Welsh Government have to approve it?

vi) Implementation

No indication is given as to how these large scale projects will be funded or incentivised and how land within priority areas will be targeted. As far as I am aware there is little incentive currently for on shore Wind with the closure of the 'Renewables Obligation' but off shore wind is supported under the 'Contract for Difference' regime.

vii) Welsh companies in the energy sector

It is my understanding that there are no Welsh owned companies operating in this sector, so it is very likely that profits from constructing and running this infrastructure will leave Wales. How will this be tackled? You say on page 36:

- For one gigawatt of renewable energy capacity to be locally owned by 2030.
- For new renewable energy projects to have at least an element of local ownership by 2020.

This would seem to be very hard to achieve without support to the industry in Wales and support for communities to achieve local ownership, and there is no mention of this.

viii) Lack of Democracy

This framework seems to brush aside Powys County Council's Local Development Plan causing an erosion of local democracy by removing local decision-making. This does not seem compatible with the objectives of the Environment (Wales) Act or the Well-being of Future Generations (Wales) Act, or the Nature Recovery Action Plan which has committed Welsh public bodies to the '*sustainable management of natural resources*', '*sustainable development*' and the "*enhancement of resilient ecosystems*", and also to work towards the 7 Wellbeing of Future Generations Goals. Rural areas are being regarded as provisioning areas for urban Wales without regard to their intrinsic benefits and needs.

ix) Devaluation or property

With such large scale developments being proposed there is a risk of planning blight for resident's homes within the priority areas. It is very likely that homes within these areas will suffer devaluation if they are near turbines, due to the landscape issues associated with them and noise from turbines.

**Priority Area 7**

I have little personal knowledge of the Priority Areas, other than Priority Area 7 so will not offer any information about them. I am located on the western edge of Area 7 so have some knowledge of this area. Firstly it seems to be much smaller than all the other areas which would limit its economic capability but more importantly it has a number of problems associated with it. I have addressed these by firstly looking at the Begwns and then the rest of the area.

I see that Arup was commissioned to review a number of criteria when drawing up the priority areas. If they had actually visited priority area 7 they would have seen it fails various tests, i.e.

- Landscape and visual impacts
- Grid Infrastructure
- Historic environment
- Vehicular access
- Ecosystem services and resilience

**i) The Begwns**

A considerable amount of Priority Area 7 would appear to be the Registered Common Land that is the Begwns. There are a number of factors that make this unsuitable for large scale development:

Land Ownership

The common was bequeathed to the National Trust in 1992. Commons owned by the National Trust are subject to laws which are different from section 38 of the Commons Act 2006. National Trust land is subject to its own Acts. Under section 29 of the National Trust Act 1907, the Trust must keep its commons "unenclosed and unbuilt on for the recreation and enjoyment of the public". That requirement is qualified by powers given in section 29 itself, and in later provisions, including section 23 of the National Trust Act 1971. (The Planning Inspectorate COMMON LAND GUIDANCE SHEET 2a).

This would therefore make it legally impossible to build wind turbines and associated structures on the Begwns.

View from the National Park

The Begwns can be viewed from much of the Brecon Beacons National Park from Hay Bluff to the Black Mountain.

### Candidate Local Wildlife Site

This is an important area for biodiversity, Radnorshire Wildlife Trust and the National Trust worked together to produce an application for the Begwns to become a Local Wildlife Site about 18 months ago.

### Pools

The most important botanical areas are the base rich wet flushes and small pools (known locally as 'mawn' pools), which are scattered across the common. Some of these pools are deep enough to sustain themselves through the summer but most dry up for the summer months (are ephemeral). Pillwort, a nationally scarce aquatic fern, is found in about a dozen pools. They have been classified as a Flagship Pond Site. Flagship Ponds are the very best pond sites in England and Wales; identified because they support populations of some of the UK's rarest species and because they represent some of the least impacted most diverse pond habitats remaining in the country.

<https://freshwaterhabitats.org.uk/projects/flagship/>

and more information about the ponds can be found here

<https://freshwaterhabitats.org.uk/flagship-focus-begwns/>

The pools also support three beetle species that are significant because they require clean water and high quality habitats free from agricultural intensification.

These 18 pools are spread right across the Begwns and it would be very difficult for a large scale windfarm development to not impact on them.

Other key species include the Flat Sedge (*Blasmus compressus*) – known from only two sites in Wales, including the Begwns and Tubular water dropwort (*Oenanthe fistulosa*), at its only known Radnorshire location.

### Birds

#### Curlew

This June there have been signs of Curlew successfully breeding i.e. a curlew mobbing a couple of crows around the Roundabout area. A local farmer in Ffynnon Gynydd reliably reported seeing young curlew on his land this year. Curlew are present both on the Begwns and in the fields adjoining and close to the southern border of the Begwns. Curlew are declining in numbers across Wales and the borders and it is believed that this whole area has the highest density of curlew in Radnorshire.

Large flocks of golden plover are present on the Begwns each autumn/winter as are fieldfares and redwings. Summer migrants include tree pipits, wheatear, whinchats and pied flycatcher. Occasional sightings include golden-eye duck and hen harrier.

In the recent past, wetter areas have supported small colonies of breeding Lapwing, but these are not thought to be breeding currently on the Begwns.

### Newts

All three species of newt are present and Great Crested Newts are in many of the ponds.

### White Clawed Crayfish

White clawed crayfish were discovered on the Begwns during recent surveys and they are present in the Cilkenni Brook which rises on the Begwns and flows into the Wye.

### Fungi

A large number of waxcaps are also found on the common, and Wales has a significant global population of these.

#### Archaeological

As well as nature conservation features, the common is rich in archaeological remains. There are five Scheduled Ancient Monuments: a deserted medieval village (Pentre Jack), a saucer cairn (Bailey Bedw); two burial cairns (Maesgwyn Round Barrow and Begwns Round Cairn) and a standing stone (Begwns Standing Stone). There are many other archaeological features such as ridge and furrow, old boundary enclosures, quarries, a WWII camp and numerous trackways.

#### **ii) Lower ground in the Painscastle-Rhosgoch valley**

##### Historic Environment

Painscastle sits within a historical landscape of mediaeval field structures that have barely changed for hundreds of years, ancient churches, vernacular farmhouses, many grade 2 listed, with the Painscastle castle in the middle of the valley.

##### Vehicular access

The main B road between Erwood and Rhosgoch through Painscastle is single track road for much of its route. The lanes off this road are all single track and are entirely unsuitable for heavy goods vehicles associated with major developments.

##### Llanbwchllyn Lake

Llanbwchllyn Lake SSSI is just outside the North Western Boundary or the Priority Area. A number of overwintering birds visit the lake such as mallard, teal, tufted duck, pochard and goldeneye. Great crested grebe breed on the lake.

##### European Protected Species

I am aware of a number of EPS within the priority area. All bat species found in Wales are EPS and we have records of lesser horseshoe bat (*Rhinolophus hipposideros*), common pipistrelle (*Pipistrellus pipistrellus*) soprano pipistrelle (*Pipistrellus pygmaeus*), brown long-eared bats (*Plecotus auritus*) and noctule (*Nyctalus noctula*) on our farm alone. All of these and more will be found across the Priority Area.

##### National trail corridor

The eastern part of Priority Area 7 falls within the 10 mile wide corridor associated with Offa's Dyke National Trail. Whilst not an official landscape designation, preserving the landscape within the Trail corridor is an important factor in maintaining the unique selling point of our iconic long distance walking routes.

##### Grid Infrastructure

I note that the Arup Report in 5.2 Grid Connection results, doesn't class Priority Area 7 as an area to be developed first due to it not having significant generation headroom, and needing grid infrastructure improvements to meet their proportion of the renewable energy target. Therefore the export of power from any infrastructure in area 7 would need new pylons to move it to the towns and cities. This seems another barrier to the suitability of this area.

How would you route pylons out of the area?

Heading West down the Painscastle valley would bring you to the Wye Valley, and north to Builth and south to Brecon would mean impacting on the Wye Valley which is a Special Area of Conservation (SAC).

Heading East from Painscastle to Kington takes the power out of Wales.



Heading North takes you over Llandeilo Hill which is SSSI and heading South to Hay on Wye takes you over the Begwns which is not suitable for all the reasons given above.

#### Tourism

This area is becoming increasingly popular with tourists, there are many accommodation providers in the area, and people visiting this area come here for the quiet unspoilt rural environment. Major development in this area would seriously jeopardise this increasingly important source of income for the rural population of this area. This doesn't seem to have been taken into account anywhere.

#### Conclusions

Whilst I agree in principle with the importance of decarbonising the energy sector, I think the renewable energy section of the consultation document has many flaws, principally the risk to further biodiversity loss, and no consideration of off shore wind which has the potential capacity to do away with large scale on shore wind developments. Also the Priority Area I know well (7) is just not suitable for large scale development and should be removed from the plan.

**NB: I would prefer my response to remain anonymous if it is to be shared in any way**