

**From:** [RICHARD NOYCE](#)  
**To:** [NDE](#)  
**Subject:** National Development Framework: Response  
**Date:** 13 November 2019 13:29:16  
**Attachments:** [Response to NDF Framework document.docx](#)

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Good afternoon,

I have attached my letter of response to the National Development Framework document.

I trust that it will receive consideration by the officers responsible.

With thanks,

Yours sincerely,

Richard Noyce



[REDACTED]

13 November 2019

[REDACTED]

NDF Team,  
Planning Policy Branch,  
Welsh Government,  
Cathays Park,  
Cardiff CF10 3NQ

Dear Team Members,

#### **National Development Framework, Consultation Response**

I have written my more detailed responses to the NDF below, but to begin with I wish to express my dismay at the designation of the Mid and South West Wales Region.

This area is far too large and too diverse to be treated as a single area. While there are certain historical and cultural similarities between parts of this huge region, in the present day the differences are so great that they cannot be treated reasonably as one. While it is possible, as the NDF document does, to define which counties belong in this artificially designated region, in the everyday world and the understanding of those who live there, Mid Wales is (and long has been) a very fluid concept. Ask a variety of residents where Mid Wales begins and ends and you will get a wide range of answers. It would be better to divide the designated area into Mid Wales, and South West Wales, and to treat them separately but making links between them where appropriate. This is not a new problem: in my 7 years as a Powys County Councillor from 2002-09 it was a constant problem, one that even the (as it was then) Welsh Assembly could not grasp. The reply to my genuine question of how Mid Wales was defined was generally answered by a blank stare. To link Mid Wales with South West Wales is unhelpful at best.

My comments are made with my more local understanding, of the former county of Montgomeryshire and connected areas across the Marches into Shropshire and into the Berwyns, as well as into the remainder of Powys. Some of the comments are, however, more widely applicable.

I have read the submission from Conservation of Upland Powys, and am largely in accord with their objections, so will not repeat them in this submission. With a greater personal focus I offer these comments:

#### Wind farms:

Outcomes 2, 9 and 11 in the NDF document give very specific aims which I broadly support. I am however dismayed at the map on p42 and the areas numbered (but not defined or described in any useful detail) 5,6,8 and 9. These areas constitute a major extension to the present areas of wind farm development and, if further developments are allowed/imposed, would lead to a further deterioration of the area, with consequent deleterious effects on the environmental quality, amenity and ecology of an already disrupted area. In my submission to the Public Enquiry into the extension of Wind Farm developments in the area I listed my concerns. These remain, and indeed are amplified by what I have observed as the wind farms that were permitted have been constructed and are coming on stream. The need to widen access roads in this rural area has led to considerable change, as has the need to provide access infrastructure within the sites themselves. The disruption to the ecology, and in particular to the upland peat deposits cannot be disregarded. Furthermore the construction of new generation wind turbine towers has led to considerable interruption to a previously relatively unspoiled landscape. The much larger towers are far more visible than the earlier generation of turbine towers, from greater distances and in a wider range of climate and light conditions. The eventual size of turbine towers, and

their bulk within the landscape, may well be even bigger, and the visual effects even greater, than the new generation. This, taken in conjunction with the extended areas (especially from a more local perspective 5, 6, 8 and 9), would lead to a further despoliation of the Montgomeryshire and wider area.

I would go so far as to add that I consider that this section is directly antithetical to the laudable aims set out in Outcomes 2 and 9. I cannot see how this mismatch can be resolved.

Outcome 11 sets out an equally laudable aim, with which I have no objection in general terms. But I cannot support the further imposition (and I use that word advisedly) of yet more windfarms in the area, or in Wales as a whole. The one major objection that, in my opinion, has never been addressed, much less answered, is how the total carbon cost of the construction, delivery, installation, maintenance and removal at end of life, of wind turbines and associated infrastructure can be calculated, and how this compares to the allegedly 'free' energy that is produced. No real attention, yet again, is paid to the likely problems of the construction and routing of pylon and cable arrays to convey any electricity produced to the National Grid. The absence of honesty and clarity in the whole matter of alternative energy production is approaching scandalous, or in more common parlance, a 'con'.

It has to be said that this problem also relates to the entire existing, planned and proposed, wind far estate of the United Kingdom.

In terms of the NDF this matter has, quite simply, been excluded or ignored. I object strongly to this omission.

#### General problems in Mid Wales:

The sections of the NDF 'Supporting our rural areas' and 'Affordable homes' are, broadly acceptable but perhaps idealistic in that no evidence has been offered as to how the Welsh Government will find the necessary resources to make these broad aims a reality. That in turn depends in turn on the eventual outcome of the current Brexit mess that has brought so much uncertainty to the future governance of the UK.

The Mid-Wales region does, as is noted in the NDF document, have the problem that 'Undulating topography across Mid Wales limits ease of movement and digital connectivity.' This has been said before, many times. Within the context of the NDF there needs to be a far sharper analysis of the very real situation and the problems that arise. There needs to be a greater and realistic analysis of the road and rail links, particularly the north/south highways network that is particularly poor from Wrexham southwards to the Heads of the Valley, and the east/west highways network that is poor from the Shrewsbury (A5) bypass westwards. In addition the rail link from Shrewsbury westwards to Aberystwyth and then northwards up the coast of Cardigan Bay, suffers greatly from a lack of capacity and from being single track.

In an ideal situation active consideration would be given to the restoration of a North/South rail network that would enable access to and from Cardiff to the whole of Wales, without necessitating a lengthy detour into England.

None of these problems are new, they have all received coverage on numerous occasions and little if anything has been done (with the exception of the Newbury bypass, a project that was first mooted as long ago as 1947).

Unless there are improvements in the aspects noted above then any long-term improvement of the economy of Mid Wales is unlikely, and all the fine words of the NDF document are to nought.

#### Affordable Homes:

I agree that there is a major need for Affordable Homes. But, unless there is concerted action from the Welsh Government in terms of stronger legislation and investment, all the fine words come to little. At present there is a planning requirement for a proportion of affordable homes in housing developments, but this is often at too low a level with such affordable houses being offered for sale at prices that are, frankly, unaffordable for many people.

At the same time there needs to be a long hard look, followed by credible action, at the problem of empty houses.

There is also a need to consider the impact of Air BNB and similar schemes that reduce the number of houses for local people. One local instance is of a privately owned 2 bedroom house that has been renovated and is used as an Air BNB property with nightly rentals of around £60 per person, per night. There are local people desperate for such properties for rent who quite simply could not afford rentals at such a level.

A further thorny problem is that of second homes, many of which sit empty for long periods of the year.

A joined-up housing policy could address these linked problems and perhaps come up with real and affordable solutions. But proper political action is needed before this can happen.

#### Supporting our rural areas:

There is a very difficult problem of farm diversification, one that is currently made both more problematic and urgent by the uncertainties surrounding Brexit. It is a fact that farmers, particularly small upland farmers, need to diversify to increase their income streams. Some, inevitably, might benefit in the short term from further wind farm developments, but most would not. Better ways of increasing income might come from tourism, particularly eco-tourism and the creation of small scale visitor attractions with an environmental focus. Such developments would be largely in tune with the desire of many visitors to the area to explore and appreciate the highly regarded natural landscapes. From numerous conversations that I have had with visitors from both the UK and abroad, this is for many the main reason that they choose to visit Mid Wales. In terms of my immediate locality this is a high priority.

There is also a need to address the current trend for farm diversification that is based on high volume egg, chicken and cattle (including veal) production, as can be seen from the increasing number of planning applications for such, essentially industrial, proposals. The present trend for growing large crops of maize for fuel production is another matter with worrying impacts on the local environment. The ecological, environmental and infrastructure impacts of all such developments are considerable and often negative. Urgent action is needed to deal with the likely post-Brexit situations in which Welsh agriculture could, by a number of admissions, suffer greatly.

#### Public Consultation:

One further comment is that the proposals in the NDF are so far-reaching that they should be made the subject of a much wider and more responsive public consultation than is possible from the option of written responses to a document published with very little visible publicity in the summer period and with a deadline in the pre-Christmas period. Looked at with a cynical eye this merely ticks the box of 'public consultation' with now general accountability. The people of Wales deserve far better than a few short sections prefacing a report than the vast majority of the people of Wales will not see and do not know about.

A wider, more open, consultation is needed, particularly with those in the younger generation who will inherit what Wales becomes.

Yours sincerely,

Richard Noyce