

CPRW's critical response to the NDF Consultation - Progress Report and Update at January 2020



Over two years in the making, the Welsh Government's draft National Development Framework is now nearing its final form after two rounds of consultations. The NDF sets an overview for Welsh Government policies and is the broad spatial blueprint for the next 20 years of land use, social and environmental planning. In the process it will supersede Planning Policy Wales 10 (PPW10) with a new PPW 11 to follow. **In short, the NDF will affect everything that follows.**

CPRW responded critically to the first consultation in 2018 [document can be seen here](#) concluding that *'it aims high but is muddled and incomplete'*.

The current 2019 version is now clearer: its underlying theme is more people-based and place-defined although it has an urban-centric approach to rural policy and excludes marine issues. Whilst CPRW recognises the NDF's ambition to create a comprehensive national context for land use and agrees with many of its objectives it cannot accept its deeply-flawed and hyper-ambitious solely-onshore renewable energy (RE) assessment. It is contrary to Welsh Government policy to address the climate emergency by relying on marine technologies; was included without prior consultation; and poses an unjustified threat to the landscape and communities or rural Wales, as explained below.

CPRW RESPONSES

Action Alert September 2019

CPRW first warned on its website and by a mail-out that the NDF's RE assessment contained '*expanded renewable energy plans to industrialise vast new areas of our countryside*' using ultra-large wind turbines and extensive solar arrays in 15 proposed Priority Areas [see here](#). Within the PAs, large-scale landscape change would be inevitable. All projects over 10 Megawatts capacity would be decided by the Welsh Government rather than by local planning authorities, with a presumption of planning approval. **In effect, resistance would be futile.**

Urgent Interim letter to Ministers 7th November 2019

As reaction to the RE proposals grew and CPRW examined them in detail, it became clear that the only feasible response was outright opposition. CPRW therefore wrote directly and urgently to Ministers requesting that the Framework's renewable energy section should be withdrawn and completely re-written [see here](#). It argued that the documents were technically inadequate and that the proposed expansion programme to meet 70% of an unspecified electricity demand in 2030 from renewable sources was restricted to onshore technologies. This was contrary to Welsh Government policies to focus on marine sources and left the NDF devoid of an articulate central policy suite capable of rationally addressing the climate emergency. CPRW requested a specific and timely response from an appropriate officer of the Welsh Government and is disappointed that it declined to reply, treating the letter as part of our later evidence, and thus avoiding the question we raised.

Formal CPRW response to the NDF 15th November 2019

CPRW therefore launched a two-pronged response to the NDF, responding constructively to the document as a whole, but attacking the RE assessment as flawed and unacceptable.

PART ONE – summarised below - responds to the majority of **the** NDF's 14 wide-ranging Questions [see here](#)

The 11 proposed Outcomes

The NDF sets out its ambition for the next 20 years' time within which several rural themes emerge, including the aim of balancing development with '*preserving the character of rural Wales*'. CPRW has long ago moved

on from the 'aspic' concept of preserving our countryside and sees 'Protection' as essentially more flexible – in terms of landscapes, land uses, habitats and the economic and social character of the countryside.

CPRW responded in detail to the concurrent Consultation on Sustainable Farming & Our Land which is insufficiently integrated with the NDF. We noted the multi-purpose link between a wide range of public goods and farming, and the need for a new sustainable and well-targeted farm policy - critically necessary in upland Wales. The NDF also fails to include the Welsh Government's Agricultural Land Classification of 2017 which must underpin a strong land use policy to protect Best and Most Versatile (BMV) land and guide optimal land use policies.

The NDF does provide a welcome admission that landscapes and other attributes of rural Wales are '*assets of great value in their own right*' but then fails to mention the European Landscape Convention, coastline issues, and the recent Welsh National Marine Plan. It vows to reverse the decline in biodiversity and to ensure that wildlife thrives throughout Wales but lacks the commitment and teeth to do so, especially outside the top tier of designated sites.

The final Outcome relates to the over-arching issue of climate change which demands urgent action on carbon emissions. CPRW wishes to play a strong and positive role in raising to this challenge, including a rational, appropriate and vigorous use of renewable energy using 'the right technology in the right place'. However, the recipe advanced in the NDF is so ill-thought-out, inadequate and just plain wrong we responded in detail, as set out separately in PART TWO (below).

Key relevant policies

Policy 4 sets out a spatial approach to rural areas but is incomplete because it is purely terrestrial and lacks integration with other issues as explained above. We welcome strategic Policy 8 on enhancing biodiversity, ecological networks and green infrastructure, but this involves a major and untested role for NRW in developing and applying its highly arbitrary Area Statements and leaves existing LPAs and agencies with an uncertain role. In principle we support the skeletal Policy 9 on developing a national forest, but this must include conserving existing woodland and establishing new, and form part of a wider strategy in which ecological, landscape, recreational and climate issues are combined. Policies 10-12 cover renewable energy and are dealt with in PAER TWO.

Other issues

The concept of **three regions** is over simplistic and urban focussed, leaving rural Wales as an after-thought. Mid and West Wales unites Powys, Ceredigion, Carmarthenshire, Pembrokeshire, Swansea and Neath Port Talbot and is also far too big and varied.

The Integrated Sustainability Appraisal (ISA) of the NDF is designed to assess its social, economic and environmental impacts but is insufficiently critical, failing to consider rural issues in sufficient depth.

Similarly, the role of **Habitats Regulations Assessment** (HRA) is to consider the relevance of the NDF to sites such as Special Areas of Conservation and Special Protection Areas. Our concerns range from the methodology used, its apparently incomplete state, and its lack of engagement with key issues. We set out a specific critique in Appendix 2 and fear that the NDF will not benefit from either the HRA or the ISA.

PART TWO

The NDF's RE Assessment for Onshore Wind and Solar

CPRW's response covered the following topics – [see document here](#)

The renewables target: 70% of electricity consumption to be generated from renewable energy by 2030

The Assessment is flawed because of its unwarranted and counter-productive decision to focus on two terrestrial technologies – onshore wind and solar - and then to concentrate them in a set of Priority Areas (PAs). This contradicts the recent Welsh National Marine Plan which identifies offshore wind and other marine technologies as the key to expanding renewable output. These faults are compounded by a complete lack of factual justification and a catalogue of errors as set out in CPRW's **Appendix 1**.

70% in 2030 - what does it mean and what does it involve?

The NDF does not say whether the target is based on 70% of current or anticipated consumption, what that is, what the current level of RE generation is, what percentage that is of current consumption, or what increase would be required. The facts (set out in CPRW’s submission) are available from published sources and show that RE generation is 50% of current consumption and would need to increase by 3TWh to reach 70% of that level. CPRW accepts that as electric technologies increase there will need to be a rise in RE generation to respond to decarbonisation of fossil fuel power. It is prudent to assume that current levels would need to double, implying an extra 6TWh.

However, an obscure NDF sub-text (only published after pressurising the W Gov) discusses impacts on existing grid capacity and reveals that the total required in the 15 Priority Areas is 9TWh. Elsewhere, the NDF makes even greater estimates for Low, Medium and High coverage of the PAs giving 9.6, 48, and 96TWh pa respectively.

The 15 onshore ‘Priority Areas’ (PAs)

The PAs have been selected simply by creating buffer zones around designated landscape and habitats but with no assessment of the likely impacts within them. The NDF canvasses vast solar arrays and turbines of up to 250m tip height – twice the height of the largest in Wales and only suitable for far-offshore use and incapable of masking. Taking all the PAs together, CPRW calculates that this would require between 808 turbines of 110m and 202 turbines of 250m – or various combinations . To this would be added 4.6 sq km of solar arrays – which are likely to be on unsuitably sloping sites where visibility would be exaggerated.

A Rational Solution

CPRW does not suggest that the perversity of the onshore Priority Areas means that no more onshore turbines and solar panels should be installed, but the illustrative table below shows that the 3TWh, 6TWh and 9TWh could be reached by one large or several lesser arrays of offshore turbines at a typical 30-50km from land. This excludes many of the wave and tidal schemes still in embryo.

2030 Target:	Offshore wind turbines	
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	MW each	Number	MW total	Output per turbine @63% CF	Total output
70% of current output 3TWh	12	45	540	67 GWh pa	2.98 TWh
70% of forecast output 6TWh	12	90	1080	67 GWh pa	5.96 TWh
Arup indicative output 9TWh	12	135	1620	67 GWh pa	8.94 TWh

Conclusion – what should the Welsh Government now do?

Following its urgent and unanswered letter of 7th November, CPRW' concluded that the Welsh Government should now:

... Take steps to examine why and how this section of the NDF has emerged in a form that contradicts declared policies and known facts;

... Consider the impression given that this has resulted from deep 'fault-lines' which have prevented a proper dialogue between different sectors;

... Consider the cost of this flawed exercise, and ask where were the supervising and mentoring facilities available to the Welsh Government;

... Consider that without a radical review, how much more difficult it now is to arrive at a rational and effective solution to the climate emergency.

An unexpected opportunity

On 12th December, shoe-horned into the morning of Election Day, the Policy Forum for Wales held a packed Conference on Energy Policy in Wales. The keynote speaker was Jennifer Pride Head of Renewables at the Welsh Government. CPRW's Geoff Sinclair attended and was the first to be able to ask a series pertinent questions arising from CPRW's critique of the NDF. It was confirmed that the targets did in fact relate to a substantial rise in RE consumption. Other responses were more general, but a constructive dialogue has begun, and CPRW's concerns were prominently aired.

The next steps

CPRW is now planning to embark on a national tour of its Branches to present an illustrative assessment of where and what the NDF is proposing in each of the 15 Priority Areas. This will demonstrate for the first time exactly what the fate of rural Wales is likely to be if the NDF draft programme is not abandoned.