

Now that the CCERA Committee is considering the new Renewable and Low Carbon Energy policies in the NDF, we would be grateful if you would consider and include the following comments in discussion with your colleagues.

1. It would appear that very little account has been taken of public consultation comments relating to this part of the NDF when compared to other sections.
2. Not enough protection is afforded to land outside the boundaries of the pre-Assessed Areas (formerly Priority Areas) for Wind farm development. It is claimed that "the Welsh Government has already modelled the likely impact on landscape". This would imply that areas adjacent to the pre-Assessed Areas have been purposely excluded for good reasons. However, we are already seeing developers signing up landowners outside these boundaries, telling us that the lines on the maps are "fluid" and indicating that they have been given encouragement by lobbyists close to Welsh Government officials. e.g. The Radnor Fforest and Aberedw Hill. In Policy 18, it could reasonably be argued that nearly every single criterion of the 10 listed, could not be met, in relation to these two examples. The NDF should define the limits very clearly, and make sure that developments are confined to the agreed pre-Assessed areas.
3. There is a huge contradiction between promoting the health and well-being of the population, and encouraging developers to swallow up much-loved and well-used, beautiful, tranquil upland areas. These spaces are needed more than ever, now that travel is severely restricted. The huge increase in visitor numbers to the Radnor Fforest alone confirms this. Many new enterprises which focus on providing therapeutic respite care for people suffering from stress-related illness are also making good use of open spaces and woodlands. They are SAFE spaces.
These are trends that are likely to continue as we adjust to necessary post-Covid and low carbon futures, and these vitally important spaces must be protected and not allowed to be shrunk by industrialisation.
4. This landscape attracts visitors upon which the local economy increasingly depends. We see an ever-increasing number of walkers, cyclists, horse riders, trail riders and four-wheel drivers using the network of Public Rights of Way and Open Access Land. Many local businesses depend on facilitating these activities. Accommodation, shops, restaurants, pubs and many other businesses benefit directly from this tourism, and they must be allowed to grow and thrive if communities are to survive.

5. What has happened to the Welsh Government's Marine Plan, and how are we supposed to interpret the UK Government's recent commitment to developing off-shore wind energy generation in relation to Wales? In the current NDF there is no discussion of the relative targets of on-shore and off-shore wind energy generation, yet WG were committed to the marine plan.

6. The term "local ownership" in relation to renewable energy projects is ill-defined and repeated throughout the documentation, without substantial guidelines to indicate how this is to be guaranteed. Relying on developers to sort this out is not good enough, as we have seen in the example of Bryn Blaen Wind Farm, or with the complete failure of Community Liaison in the case of Hendy Windfarm. In the latter case, this was an actual planning condition laid down by a Welsh Government minister!

7. One of the most disappointing features of this version of the NDF is the absence of a policy aimed at conserving energy. Yet again we see no serious attempt to try and persuade everyone to use **LESS** energy. The emphasis is always on producing more, rather than initiatives aimed at reducing wastage.

Thank you for considering these points. Please do not hesitate to contact us if there is anything that requires clarification.

Additional information from Individual:

It has been brought to my attention that, in relation to the proposed pre-Assessed Area 4 of the revised NDF, it is possible that a 10Km Buffer Zone should be applied to the military testing range in Harley Valley, New Radnor, belonging to Radnor Ranges Ltd. This land is part of the Radnor Fforest adjacent to Pre-Assessed Area 4.

It should also be noted that the Radnor Fforest is frequently subject to low flying jet, military helicopter and transport training flights, as well as occasional army training exercises and helicopter flights into Harley Valley itself.