

From: Geoffrey Sinclair <[REDACTED]>  
Sent: 11 November 2019 09:51  
To: PS FirstMinister; Correspondence mail - JJ; Correspondence mail - LG  
Cc: [REDACTED]  
Subject: Urgent Interim Submission of the NDF from CPRW  
Attachments: CPRW NDF Urgent Interim Submission 7 Nov 2019 signed text.pdf

The Campaign for the Protection of Rural Wales:  
Chair: Peter Alexander-Fitzgerald  
Contact details:

[REDACTED]

### Urgent Interim Submission on the NDF (National Development Framework)

Dear Ministers

I write on behalf of CPRW's National Executive Committee to draw your urgent attention to the attached letter (text reproduced below) from our national Chair, Peter Alexander-Fitzgerald, about the ongoing Welsh Government consultation on the National Development Framework (NDF). We have taken this unusual step prior to our formal and detailed response because – as you will read – we have concluded that the all-important Renewable Energy assessment within the NDF is so misconceived and error-laden that it is unfit for purpose, should be removed from the NDF, and should be re-written prior to a re-consultation.

Our six reasons are set out in the letter, and are – when considered together - of such importance that we believe that they render the NDF devoid of an articulate central policy suite capable of rationally addressing the climate emergency.

Yours sincerely

Geoffrey Sinclair

[REDACTED]

The public consultation process on the National Development Framework

CPRW is preparing a comprehensive response to the Welsh Government's National Development Framework (NDF) consultation, which will be sent on 15th November.

In the meantime, on behalf of CPRW's National Executive Committee, I wish to make this urgent interim submission concerning the Renewable Energy (RE) assessment contained within the NDF and expressed in proposed Policies 10-13. CPRW has studied this text and associated background documents, and has reached the following conclusions:

- a) the RE assessment does not set out a clear statement of current and projected electricity generation and consumption, ignores the fact that Wales is a net exporter of electricity, and fails to quantify the level of additional output required to reach the target of 70% by 2030;
- b) it considers only onshore wind and solar technologies as contributors and ignores the role of other existing and viable sources over the target period, notably the draft Marine Plan's commitment to expand offshore wind;
- c) it is full of fundamental errors in defining the 15 wind and solar Priority Areas and fails to describe or assess potential impacts of its proposals upon them;
- d) although incredibly complex, it is not a fully-fledged document and has emerged into the NDF process without prior consultation or public debate;
- e) in its present form it is not therefore a Framework document conforming to the aims and scope of the NDF as a whole - and is unfit for that purpose.

CPRW accordingly submits that the RE part of the NDF should be set to one side and postponed for subsequent re-drafting. This would allow current responses to be considered, and its shortcomings rectified. Once it has reached an appropriate level of accuracy, comprehensive-ness and clarity it can be subject to a later dedicated consultation process. Only after that can it become capable of being included within the scope of the Framework.

Unless and until this is done, CPRW maintains that the NDF itself is devoid of an articulate central policy suite capable of rationally addressing the climate emergency. This is a debate in which we are eager to play a constructive role.

I would be grateful for a specific and timely response to this request from an appropriate officer of the Welsh Government.

Yours sincerely

[original version signed]

Peter Alexander-Fitzgerald

# **National Development Framework – Welsh Government Consultation**

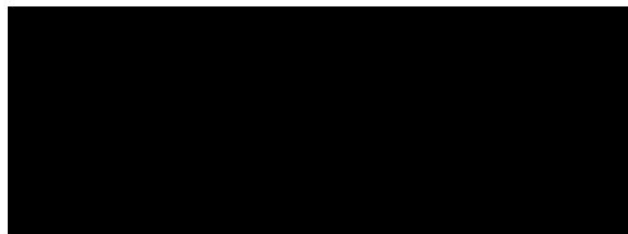
**7<sup>th</sup> November 2019**

## **Urgent Interim Submission from CPRW (The Campaign for the Protection of Rural Wales)**



**Chair: Peter Alexander-Fitzgerald**

**Contact details:**



CPRW was founded in 1928, this year celebrates its 91st anniversary, and is Wales' only organisation whose primary concern is the country's rural landscape and the land uses that support it. It is a membership charity (number: 239899) with its head office at 31 High Street Welshpool Powys and has 14 Branches throughout the country. Further details are to be found on its website (<https://cprw.org.uk>) including its National Executive Committee (NEC) and representative advisory Council.

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Peter Alexander-Fitzgerald