

From: [Charles Mason](#)
To: [NDE](#)
Subject: NDF consultation response
Date: 13 November 2019 16:46:37
Attachments: [Wales NDF Consultation TENP et al.doc](#)
Importance: High

13th November 2019

To the Welsh Government National Development Framework
Consultation, email ndf@gov.wales

**Subject: Response to Draft National Development
Framework**

Please find attached as a Word document a joint response
submitted by The Environmental Network Pembrokeshire on
behalf of

- The Environmental Network Pembrokeshire
- Friends Of The Earth Pembrokeshire
- Blaise Bullimore Marine Ecology Consultant
- Christopher Jessop Independent Energy Consultant

Could you please confirm by return that you have received
this response and successfully opened the attached

document

Thanking you in anticipation

Charles Mason

The Environmental Network Pembrokeshire

Telephone [REDACTED]

C/o [REDACTED]

WELSH GOVERNMENT CONSULTATION:
NATIONAL DEVELOPMENT FRAMEWORK 2020 - 2040

Joint response from

- The Environmental Network Pembrokeshire • Friends Of The Earth Pembrokeshire
- Blaise Bullimore Marine Ecology Consultant • Christopher Jessop Independent Energy Consultant

Submitted 13th Nov 2019 on behalf of all parties by The Environmental Network Pembrokeshire
c/o [REDACTED]

Submitted as an email attachment sent to ndf@gov.wales

To whom it may concern,

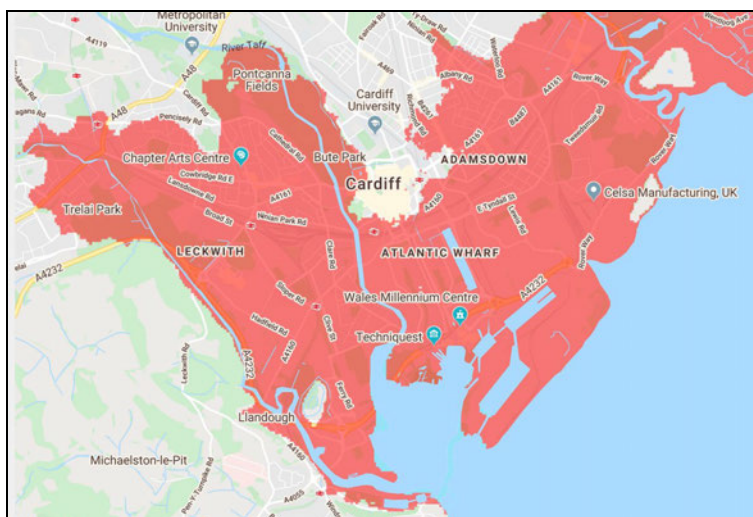
In the light of the climate emergency, Wales' draft National Development Framework (NDF) is **not fit for purpose**; we therefore reject the draft NDF outright.

The coverage accorded to climate change and the climate emergency in the NDF is **fundamentally inadequate**. It beggars belief that the first real reference is on Page 15, therefore implying it is even less important than tourism (Page 14).

The NDF must be re-drafted as follows:

1. Page 1 must clearly state that the global climate emergency is an existential threat to all ecosystems that sustain nature throughout the planet, on which human life entirely depends.
2. The NDF must stipulate that responding to the climate emergency **quickly and across the board** is the primary Welsh planning objective which **overrules all other considerations**.
3. For context, the NDF must confirm the latest peer-reviewed projections for Wales as regards
 - disruptive weather events
 - sea level rise
 - sea surge flooding.

Further to (3), the most recent sea event forecasts are from Climate Central (www.climatecentral.org), based on their CoastalDEM Coastal Risk Screening Tool: on this capture from their interactive map, red areas indicate an **annual** flood risk by 2050.



We need **a complete reappraisal of Welsh land use plans**, with unprotectable areas identified; to maintain the human and economic viability of communities, the NDF must steer the relocation of

- roads & railways
- other infrastructure
- housing
- businesses.

Whilst rejecting the NDF outright for not prioritising the climate emergency, we have specific major concerns regarding Welsh renewable energy policy and targets.

1. The climate emergency is so severe, Wales needs a war footing attitude to renewable energy production, abandoning landscape and aesthetic considerations: any viable resource needs exploiting quickly, with permitted development massively expanded. This means hard decisions regarding some ecological habitats because, without the global temperature rise restricted, **contemporary habitats will be wiped out**.
2. Renewable electricity generation targets: Wales can only fully decarbonise if fossil fuel use ends. Completely replacing oil and gas needs a **huge** increase in renewable electricity generation to power transport, run industrial processes, and supply home heating.
3. Furthermore, Wales is morally bound to not just meet its own requirements for energy but to **export very large amounts of renewable energy to the rest of the UK**. This is because Wales has a very large proportion of the total UK wind energy resource (onshore plus offshore); and, with a good resource and lower population densities and less intensive farming, Wales has great solar PV generation potential. Welsh planning policy, NDF included, must therefore base Welsh renewable energy land use projections on meeting its own requirements **plus** fulfilling these moral obligations to supply the rest of the UK. (Wales is also blessed with much tidal and wave energy potential, but these fall outside the scope of terrestrial planning).
4. The necessary Welsh renewable energy expansion will require massive reinforcement and expansion of long distance and local electricity grids:
 - The NDF must have bureaucratic barriers removed;
 - The Welsh Government must prepare to step in with Special Powers if grid operators prove uncooperative, e.g. demanding unreasonable new connection fees – as has often happened in the past, preventing the roll-out of many otherwise viable green power installations.

The Scottish Government, it should be noted, already well understands the potential industrial, commercial, and balance of payments benefits of

- energy self-sufficiency
- large scale export of renewable energy to England, Ireland, etc.

Furthermore, those UK energy businesses cognisant of the climate emergency are pressing for urgent action: today (13.11.2019) the Chief Executive Officer of SSE said the company's shareholders wanted investment in net zero, and he demanded that HMG increased its ambitions, stating that his firm and others were ready to deliver not 30 GW but up to 50 GW of offshore wind capacity. (Alistair Phillips-Davies, interview, BBC Radio 4 Today Programme).

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