



We are writing with reference to the Working Draft National Development Framework (NDF) which has been put before the Welsh Parliament for scrutiny for a period of 60 days. The John Muir Trust is a UK conservation charity dedicated to the experience, protection and repair of wild places. In Wales, we have been helping to connect people to its wild places for the over twenty years and, as a result, are aware of the social and cultural significance of Wales' wild places and their value to people experiencing them.

We have some concerns about the proposed spatial policies for renewable energy development in the Working Draft NDF. Whilst we recognise the national importance of renewable energy in meeting Wales' net zero emission targets, we are concerned that some of the policies as drafted put the value of some of Wales' wild places at risk of significant impacts from large scale renewable energy development.

The Welsh Government has identified priority areas for renewable energy development. These areas include areas in Mid and West Wales which, as a region, has been identified as having significant renewable energy potential. The County of Ceredigion is in Mid-Wales and includes the Cambrian Mountains. These mountains are an example of a wild upland landscape that, although not protected by a landscape designation, is highly valued by people who want to experience and enjoy wild nature. On the map of National Natural Resources at page 79 of the Working Draft NDF they are marked as a hotspot for biodiversity and ecosystem services.

However, on the map at page 94 of the Working Draft NPF these mountains appear to overlap with pre-assessed areas (3 and 4) for wind and heat renewable energy development. Policy 17 as drafted states there is a 'presumption in favour of large scale on-shore wind and solar energy development in these areas' subject to criteria outlined in Policy 18. The criteria in Policy 18 do not mention the wild land qualities that may be at risk in some of these pre-assessed areas. However, we note that the Working Draft NDF states 'Irrespective of location or scale, the design and micro-siting of proposals must seek to minimise the landscape and visual impact, particularly those in close proximity to homes and tourism receptors. Both within and outside Pre-Assessed Areas, communities should be protected from significant cumulative impacts to avoid unacceptable situations whereby, for example, smaller settlements could be potentially surrounded by large wind schemes.'

To assist the Committee with scrutinising the Working Draft NPF in relation to Policies 17 and 18 we thought it might be helpful to share the approach to protecting wild land that the devolved administration in Scotland has been applying over recent years. Scotland's on-shore wind development spatial strategy, as set out in current Scottish Planning Policy, guides where on-

shore renewable development is appropriate by recognising three groups of areas: Group 1 areas are not suitable for renewable development (this mirrors a presumption against renewable energy

development in Scotland's National Parks and Areas of Outstanding Beauty and is similar to the presumption against development in these areas in the Working Draft NDF), Group 2 areas have significant protection, in these areas renewable development can proceed in some circumstances, and Group 3 areas are where development is likely to be acceptable.

Group 2 areas include Scotland's Wild Land Areas. These are areas that have been identified by the Scottish Government as 'Scotland's more natural, remote and uninhabited landscapes whose strength and extent of wildness is considered to be of national importance'. The qualities of

Scotland's Wild Land Areas (such as remoteness, ruggedness, perceived naturalness, absence of human artefacts) can also be found in parts of Wales, in areas within existing landscape designations as well as areas without, such as the Cambrian Mountains. Comparing our wild land mapping for Wales, with the Areas identified in the Working Draft NDF as having potential for renewable energy development, wild land appears within Areas 4, 5, 6 and 8.

We would recommend that the Committee considers how Scotland's National Development Framework has recognised Wild Land Areas as areas of national importance and reflected this recognition in its on-shore spatial strategy within Scottish Planning Policy through the inclusion of Group 2. This approach offers the Welsh Government a model for refining its Working Draft NDP and developing guidance for determining whether development proposed outside a national designation but in an area of high landscape value should proceed or not.

We would welcome an opportunity to discuss our suggestions with you if this would be of any use. Please feel free to contact me by email if you have any questions or would like us to share more information.