

## **Eco2's response to the Welsh Government's consultation on the Draft National Development Framework**

### **About Eco2**

[eco2uk.com/](http://eco2uk.com/)

Eco2 is Welsh based company that delivers green energy projects across the UK and Europe, including biomass power plants, wind farms, heat projects and emerging technologies. Using our expertise, we oversee the whole process from initiating and investment, to development and operation.

For 17 years, we have helped to produce enough renewable energy to power over one million homes and counting. We work closely with local authorities, community groups, planners, environmental organisations and government departments to deliver successful large-scale renewable energy developments with the support of local communities.

The Eco2 team has:

- raised £2.3 billion in investment
- delivered over 280MW of installed power from renewable sources
- saved 1.75 million tonnes of CO<sub>2</sub> per annum
- developed projects supplying electricity to 1.37m homes
- created 2,773 jobs

### **Introduction**

Eco2 is pleased to be part of delivering the Welsh Government's aspirations for renewable energy in Wales. But we believe that the Government's ambitions could be set much higher. The IWA has set out a plan for the complete decarbonisation of Wales's electricity by 2035, a credible and achievable goal which we support. By comparison, the Welsh Government's target of 70 per cent of electricity from renewable sources by 2030 is a modest and uninspiring goal, which will not fulfil Wales's broader obligations on climate change. Wales gave the world the fuel and inventions that drove forward the industrial revolution; we should lead the world in the development of renewable energy as well.

While we welcome the declaration of a Climate Emergency by the Welsh Government, we do believe that it should 'represent a sharp change in policy'. It is impossible for Wales to reduce its GHG emissions to 95 per cent of 1990 levels, as it has committed to do so, without learning from past mistakes and correcting them with the level of urgency that an emergency demands. The next 20 years is the only window we will ever have to avert global climate disaster. The next generation will not have the luxury of being able to correct our mistakes.

The goal set by the CCC, though difficult, represents the challenge of our era, and Wales's fair contribution to global efforts to combat global heating. Development of large-scale renewable energy is an essential part of meeting that goal, and the National Development Framework has the potential to make or break our efforts to decarbonise our electricity, transport and heating sectors.

With that in mind, the National Development Framework is an unmissable opportunity to correct the mistakes of what came before it. That is the spirit in which we have set out our response to this consultation.

## **Our response to the consultation**

### **Response to Question 1: NDF outcomes (Chapter 3)**

It is right that the NDF should be structured around delivery of a set of specific objectives. However, the 11 ‘outcomes’ identified in Chapter 3 are not specific enough to serve as meaningful targets to work toward.

The ambitions behind these outcomes are easily supportable. However, objectives of these kind should be specific, measurable, achievable, relevant and time-limited – a set of criteria that any project manager should be familiar with. But of these 11 outcomes, only one is specific or measurable. For the rest, it will be very difficult to measure progress against them as determining when the outcomes have been met is entirely subjective. As a result, these outcomes are not suitable objectives to drive the huge set of changes required. For this strategy to have the desired effect it needs specific, measurable goals.

### **Response to Question 5: Low Emission Vehicles (Policy 7)**

While sustainable spatial planning decisions can go some way toward reducing the need to travel and encouraging modal shifts, there will inevitably still be a need for cars in 2040, especially in rural areas. Enabling the transition to widespread use of electric vehicles is essential, which means the introduction of super-fast electric vehicle charging infrastructure across Wales, not just in and around urban areas.

We agree that planning will be essential to delivery of electric vehicle charging infrastructure, especially in rural areas. EV travel between South and North Wales is currently impractical, requiring lengthy detours into England, discouraging the widespread adoption of EVs that is necessary. Unfortunately, no credible progress can be made on improving EV charging infrastructure in Mid-Wales as long as the future of the Mid-Wales electricity grid remains uncertain. This is a subject on which the Draft NDF is regrettably silent.

Development of the Mid-Wales grid is also essential to unlock additional viable sites for onshore wind and solar energy and associated battery storage, that will be necessary for Wales to meet its 2030 renewable energy targets. EV charging, the mid-Wales grid and large-scale renewables development should not be looked at as individual challenges, but as interrelated strategic developments necessary for the decarbonisation of Wales’s electricity sector and transport.

### **Response to Question 7: Renewable energy and district heat networks (Policies 10-15)**

#### ***i. Targets***

Eco2 is supportive of the Welsh Government’s targets for 70 per cent of Wales’s electricity demand to be met by renewable energy by 2030, though we believe that a more ambitious target is both credible and needed.

As a Welsh company, we also support the principle of increasing the local ownership of renewable energy in Wales. However, we would like to see assurances that policies designed to encourage local ownership will not obstruct international partners, without whom Wales will not be able to meet its renewable energy targets.

We work closely with our partners in Statkraft to develop and operate renewable energy projects, mostly wind farms. Statkraft is a global company, and Europe's largest generator of renewable energy. While we support the principle that all energy projects should have at least an element of local ownership, we believe that compliance with that requirement must not impede investment by important international partners, such as Statkraft.

We welcomed the increased certainty that came from the introduction of the DNS process, though the planning process is still too often a major obstacle to considered and sustainable development. The new regime, Welsh Infrastructure Consent, will need to work more quickly in order to deliver large-scale renewable energy developments at the necessary pace to meet the Welsh Government's modest 2030 targets.

## ***ii. Spatial strategy***

The choice by the Welsh Government to apply a spatial approach to the development of renewable energy, rather than a criteria-based approach, is not one that we wholeheartedly welcome.

The existing TAN 8 framework, and its attempt to concentrate development within Strategic Search Areas has failed to deliver the scale and speed of renewable energy development that Wales has needed and failed to meet the targets that the Welsh Government itself set in 2010. Those targets were intended to increase onshore wind installed capacity from 0.7 GW to 2 GW by 2015-17. To date, Wales's onshore wind capacity has reached only 1.2 GW.

Sadly, the Draft NDF's approach to renewables development is broadly similar to the approach used in TAN 8, and we are concerned that it will repeat and compound the same mistakes. TAN 8 has held back the necessary development of renewable energy in Wales, and it is not obvious why the Welsh Government proposes to use the same broad approach for the National Development Framework

In our view, rebadging or replacing TAN 8's Strategic Search Areas (SSAs) with the NDF's Priority Areas for Renewable Energy (Priority Areas) will not deliver the pace of large-scale renewables development that is necessary for Wales to meet its decarbonisation targets, or do its part to ensure the UK achieves Net Zero GHG emissions by 2050.

We are concerned that the NDF will be a wasted opportunity to devise a strategy that can deliver on the modest targets for renewables development that the Welsh Government has set out. Given the growing dangers of climate breakdown, and the extent of the measures needed to meet the challenge, we are worried that the Draft NDF's spatial strategy will waste this opportunity, at a time when we do not have a surfeit of opportunities

The process adopted in Scotland, which uses a criteria-based strategy, instead of a spatial approach, has worked much better at delivering large-scale renewables at the necessary pace. The Scottish Government's Land Use Strategy evaluates plans, policies, strategies and projects against a set of criteria relevant to their situation. As a result of this more rational approach, Scotland has delivered more than 8.1 GW of installed onshore wind capacity, while Wales has delivered only 1.2 GW, far behind its own targets.

For these reasons, we would urge a criteria-based strategy, that offers a presumption in favour to any proposal that meets essential criteria. These criteria should, of course, seek to minimise adverse effects, in order to protect local residents and the environment.

However, if the Welsh Government is committed to a spatial strategy, then we would urge a number of adjustments, which we detail below.

### ***iii. Capacity of Priority Areas***

We are concerned that attempting to concentrate renewables development in the proposed Priority Areas will make it impossible to avoid or meaningfully minimise cumulative impacts, as P10 requires. While we of course share the Welsh Government's desire to minimise the cumulative adverse effects of renewable energy development, including noise and visual impacts, we are concerned that attempting to concentrate development within the Priority Areas will be extremely difficult in practice. The geography of several of the Priority Areas appears closely based upon the existing SSAs, and consequently already contain a high density of existing operational sites, which will make avoiding or minimising the cumulative impacts of new schemes unfeasible and prohibitive to development.

The NDF acknowledges that much of the area within the Priority Areas is not suitable, such as around Natura 2000 sites. Once these unsuitable locations, and their buffer zones, have been removed from the Priority Areas, very few viable sites are left. What is left is too often a patchwork of small, disconnected parcels of land, rather than large single sites which support efficient and low-impact development.

We are concerned that there does not appear to be any attempt within the Draft NDF to quantify the amount of renewable energy generation that the Priority Areas can support. TAN 8 set out indicative capacity targets for each of the SSAs, so it would appear prudent to produce similar estimates to accompany these Priority Areas.

### ***iv. Necessity of development in 'Amber' areas***

However, given the aforementioned restrictions on development within the Priority Areas, it is not possible to meet even the modest renewable energy targets adopted by the Welsh Government if large-scale wind and solar development is concentrated solely within Priority Areas. To meet the 2030 targets, significant development of large-scale wind and solar will be necessary outside the Priority Areas as well, i.e. in 'Amber' areas. While we recognise that P11 notes that large-scale developments "may be appropriate" outside the Priority Areas, it does not state that they will be necessary. We believe that P11 should directly acknowledge the unavoidable need for carefully sited large-scale development outside of the Priority Areas. P11 should also give significant weight to proposals' contribution to meeting Wales's decarbonisation and renewable energy targets, as they would be in Priority Areas.

### ***v. Priority Area boundaries and buffers***

Finally, we know that viable sites will often straddle the boundary between Priority and non-Priority Areas. This does not appear to have been anticipated in the NDF. In this regard, the NDF is a backwards step from the intentions of the failed TAN 8, which did at least have 5km buffer zone for refinement. In practice, this buffer was rarely used as intended by planning authorities, but the purpose was highly practical and necessary. To avoid ambiguity that could impede the full development of viable sites, we

recommend that in cases where schemes fall mainly within a Priority Area, the presumption in favour of development and the acceptance of landscape change should be extended to the remainder of the site as well, assuming other criteria are met.

## **Consultation Response Form**

Your name	David Williams
Your address	Vision House, Oak Tree Court, Cardiff Gate Business Park, Cardiff CF23 8RS
Preferred contact details (email/phone/post)	<a href="mailto:David.williams@eco2uk.com">David.williams@eco2uk.com</a> <a href="mailto:Dafydd@eco2uk.com">Dafydd@eco2uk.com</a>
<u>Organisation (if applicable)</u>	Eco2 Limited



## 1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with any of the 11 Outcomes, please tell us why:

It is right that the NDF should be structured around delivery of a set of specific objectives. However, the 11 'outcomes' identified in Chapter 3 are not specific enough to serve as meaningful targets to work toward.

The ambitions behind these outcomes are easily supportable. However, objectives of these kind should be specific, measurable, achievable, relevant and time-limited – a set of criteria that any project manager should be familiar with. But of these 11 outcomes, only one is specific or measurable. For the rest, it will be very difficult to measure progress against them as determining when the outcomes have been met is entirely subjective. As a result, these outcomes are not suitable objectives to drive the huge set of changes required. For this strategy to have the desired effect it needs specific, measurable goals.

## 2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

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### 3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

### 4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

## 5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

While sustainable spatial planning decisions can go some way toward reducing the need to travel and encouraging modal shifts, there will inevitably still be a need for cars in 2040, especially in rural areas. Enabling the transition to widespread use of electric vehicles is essential, which means the introduction of super-fast electric vehicle charging infrastructure across Wales, not just in and around urban areas.

We agree that planning will be essential to delivery of electric vehicle charging infrastructure, especially in rural areas. EV travel between South and North Wales is currently impractical, requiring lengthy detours into England, discouraging the widespread adoption of EVs that is necessary. Unfortunately, no credible progress can be made on improving EV charging infrastructure in Mid-Wales as long as the future of the Mid-Wales electricity grid remains uncertain. This is a subject on which the Draft NDF is regrettably silent.

Development of the Mid-Wales grid is also essential to unlock additional viable sites for onshore wind and solar energy and associated battery storage, that will be necessary for Wales to meet its 2030 renewable energy targets. EV charging, the mid-Wales grid and large-scale renewables development should not be looked at as individual challenges, but as interrelated strategic developments necessary for the decarbonisation of Wales's electricity sector and transport.

## 6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

### ***i. Targets***

Eco2 is supportive of the Welsh Government's targets for 70 per cent of Wales's electricity demand to be met by renewable energy by 2030, though we believe that a more ambitious target is both credible and needed.

As a Welsh company, we also support the principle of increasing the local ownership of renewable energy in Wales. However, we would like to see assurances that policies designed to encourage local ownership will not obstruct international partners, without whom Wales will not be able to meet its renewable energy targets.

We work closely with our partners in Statkraft to develop and operate renewable energy projects, mostly wind farms. Statkraft is a global company, and Europe's largest generator of renewable energy. While we support the principle that all energy projects should have at least an element of local ownership, we believe that compliance with that requirement must not impede investment by important international partners, such as Statkraft.

We welcomed the increased certainty that came from the introduction of the DNS process, though the planning process is still too often a major obstacle to considered and sustainable development. The new regime, Welsh Infrastructure Consent, will need to work more quickly in order to deliver large-scale renewable energy developments at the necessary pace to meet the Welsh Government's modest 2030 targets.

## ***ii. Spatial strategy***

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Sadly, the Draft NDF's approach to renewables development is broadly similar to the approach used in TAN 8, and we are concerned that it will repeat and compound the same mistakes. TAN 8 has held back the necessary development of renewable energy in Wales, and it is not obvious why the Welsh Government proposes to use the same broad approach for the National Development Framework

In our view, rebadging or replacing TAN 8's Strategic Search Areas (SSAs) with the NDF's Priority Areas for Renewable Energy (Priority Areas) will not deliver the pace of large-scale renewables development that is necessary for Wales to meet its decarbonisation targets, or do its part to ensure the UK achieves Net Zero GHG emissions by 2050.

We are concerned that the NDF will be a wasted opportunity to devise a strategy that can deliver on the modest targets for renewables development that the Welsh Government has set out. Given the growing dangers of climate breakdown, and the extent of the measures needed to meet the challenge, we are worried that the Draft NDF's spatial strategy will waste this opportunity, at a time when we do not have a surfeit of opportunities

The process adopted in Scotland, which uses a criteria-based strategy, instead of a spatial approach, has worked much better at delivering large-scale renewables at the necessary pace. The Scottish Government's Land Use Strategy evaluates plans, policies, strategies and projects against a set of criteria relevant to their situation. As a result of this more rational approach, Scotland has delivered more than 8.1 GW of installed onshore wind capacity, while Wales has delivered only 1.2 GW, far behind its own targets.

For these reasons, we would urge a criteria-based strategy, that offers a

presumption in favour to any proposal that meets essential criteria. These criteria should, of course, seek to minimise adverse effects, in order to protect local residents and the environment.

However, if the Welsh Government is committed to a spatial strategy, then we would urge a number of adjustments, which we detail below.

### ***iii. Capacity of Priority Areas***

We are concerned that attempting to concentrate renewables development in the proposed Priority Areas will make it impossible to avoid or meaningfully minimise cumulative impacts, as P10 requires. While we of course share the Welsh Government's desire to minimise the cumulative adverse effects of renewable energy development, including noise and visual impacts, we are concerned that attempting to concentrate development within the Priority Areas will be extremely difficult in practice. The geography of several of the Priority Areas appears closely based upon the existing SSAs, and consequently already contain a high density of existing operational sites, which will make avoiding or minimising the cumulative impacts of new schemes unfeasible and prohibitive to development.

The NDF acknowledges that much of the area within the Priority Areas is not suitable, such as around Natura 2000 sites. Once these unsuitable locations, and their buffer zones, have been removed from the Priority Areas, very few viable sites are left. What is left is too often a patchwork of small, disconnected parcels of land, rather than large single sites which support efficient and low-impact development.

We are concerned that there does not appear to be any attempt within the Draft NDF to quantify the amount of renewable energy generation that the Priority Areas can support. TAN 8 set out indicative capacity targets for each of the SSAs, so it would appear prudent to produce similar estimates to accompany these Priority Areas.

### ***iv. Necessity of development in 'Amber' areas***

However, given the aforementioned restrictions on development within the Priority Areas, it is not possible to meet even the modest renewable energy targets adopted by the Welsh Government if large-scale wind and solar development is concentrated solely within Priority Areas. To meet the 2030 targets, significant development of large-scale wind and solar will be necessary outside the Priority Areas as well, i.e. in 'Amber' areas. While we recognise that P11 notes that large-scale developments "may be appropriate" outside the Priority Areas, it does not state that they will be necessary. We believe that P11 should directly acknowledge the unavoidable need for carefully sited large-scale development outside of the Priority Areas. P11 should also give significant weight to proposals' contribution to meeting Wales's decarbonisation and renewable energy targets, as they would be in Priority Areas.

### ***v. Priority Area boundaries and buffers***

Finally, we know that viable sites will often straddle the boundary between Priority and non-Priority Areas. This does not appear to have been anticipated in the NDF.

In this regard, the NDF is a backwards step from the intentions of the failed TAN 8, which did at least have 5km buffer zone for refinement. In practice, this buffer was rarely used as intended by planning authorities, but the purpose was highly practical and necessary. To avoid ambiguity that could impede the full development of viable sites, we recommend that in cases where schemes fall mainly within a Priority Area, the presumption in favour of development and the acceptance of landscape change should be extended to the remainder of the site as well, assuming other criteria are met.

## 8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

[illegible]

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

## 9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
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Frequency	Count
Daily	1
Weekly	1
Monthly	1
Occasionally	1
Rarely	1
Never	1

## 10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

## 11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

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## **12. Integrated Sustainability Appraisal**

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

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## **13. Habitats Regulations Assessment**

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

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## 14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

## 15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

**16. Are you...?**

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input type="checkbox"/>

<b>Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here</b>	<input checked="checked" type="checkbox"/>
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