Fred. Olsen Renewables Ltd. response to the National Development Framework (NDF) 2020-2040 consultation

Fred. Olsen Renewables made its first investment in wind power over twenty years ago and has grown to be one of the largest independent wind energy producers in the UK. Our team is continuing to make significant efforts in developing wind farm projects, which has proven particularly successful in the UK, where the company's first large scale wind farm, Crystal Rig, commenced operations in 2003 and where our most recent project; Brockloch Rig Wind Farm in Dumfries and Galloway was completed in 2017.

To date we have developed, consented and, now currently, operate, over 500MW in the UK, capable of powering over 295,000 homes annually. The company is looking to make renewables the core of its future business and with a consenting success close to 100% we are actively creating a new portfolio across the UK, including Wales.

Comments on the NDF's scope and ambition

The NDF is a once in a generation opportunity to put in place a new planning framework that can unlock Wales' potential to help meet the challenges of the declared climate emergency at a national level and also as an example of leadership globally.

Fred. Olsen Renewables broadly welcomes the Welsh Government's positive approach to renewables and the efforts made to reflect this in the narrative and policies of the NDF, summarised as follows:

> *"The challenges of climate change demand urgent action on carbon emissions and the planning system must help Wales lead the way in promoting and delivering a competitive, sustainable decarbonised society. Decarbonisation and renewable energy commitments and targets will be treated as opportunities to build a more resilient and equitable low-carbon economy, develop clean and efficient transport infrastructure, improve public health and generate skilled jobs in new sectors."*

Fred. Olsen Renewables appreciates there are continuing limitations on Welsh Government's ability to develop and manage a holistic approach to the decarbonising agenda while it still does not have full control over matters such as electricity transmission and The Crown Estate's leasing regime for the development of offshore and marine energy. However, the inter-relatedness of the UK energy system was evident during the recent Low Frequency Demand Disconnection event on August 9th 2019 where many thousands of Welsh customers were temporarily impacted.

This situation supports Fred. Olsen Renewables position that the NDF must not be 'silent' on the support required for other renewable energy development (apart from onshore wind and solar) and how these technologies potentially contribute to a resilient and secure energy system. This includes reference to tidal projects, offshore wind (and onshore infrastructure associated with offshore wind development) and energy development that will facilitate renewable energy, e.g. pumped hydro and storage.

Fred. Olsen Renewables believes Welsh Government should articulate a clear direction of travel as regards Wales' future position as a net power exporter within the context of the

NDF. This should include its analysis of how decarbonising heat and transport are likely to impact demand for renewable electricity. With an increased policy emphasis on local benefit, Wales stands to benefit from an increase in locally generated renewable electricity, however the policy position on the potential for the export of electricity from renewables remains unclear.

Fred. Olsen Renewables contends that in light of the existing levels of electricity consumption from renewable sources already operational and in light of the furthering of Welsh Government's stated ambition, that the 70% / 2030 figure appears conservative. Welsh Government should therefore consider moving more quickly and setting a target for the percentage of power consumption in Wales that will be met by Welsh renewables in 2040 i.e. over the timeframe captured by the NDF.

Fred. Olsen Renewables believes the consultation document would also have benefitted from providing some insight into Welsh Government's view of the future interaction between expected increased demand arising from the decarbonisation of heating and transport, the need for complementary renewable energy technologies and the need to upgrade the electricity transmission and distribution networks in and between Wales' regions. Fred. Olsen Renewables suggests that the NDF should acknowledge the likely need for improved grid infrastructure *as an end in itself* to deliver future decarbonisation.

Furthermore, the NDF takes little account of the huge challenge to decarbonise heat beyond the establishment of District Heat Networks and to offer support "wherever they are viable". More consideration could have been given to a decarbonisation roadmap where the electrification of heating and transport and re-purposing of the gas distribution network may both need to play strategic roles in delivering a 'street by street' solution to decarbonisation.

Fred. Olsen Renewables feels that specific mention should be made of the opportunities to contribute to targets through repowering, extending the operational life or adding additional turbines to existing wind farms.

Fred. Olsen Renewables welcomes the fact that consideration was given to turbines of up to 250m tip height in the Arup mapping exercise as turbines of over 200m tip height are already being planned for in development projects in the UK and will become the norm. It would be helpful to see specific reference to this scale of technology in the NDF.

Fred. Olsen Renewables comments on the NDF's policy proposals for Renewable Energy recognises that the ambition and scope of the NDF represents a step change from the outgoing Technical Advice Note 8 'Planning for Renewables Energy' (July 2005) (TAN8). TAN8 effectively (though not explicitly) restricted opportunities for developing projects >25MW to the Strategic Search Areas (SSAs) and provided limited opportunities for 5-25MW projects, whereas the NDF envisages consideration of large-scale renewable energy projects (>10MW) in all areas outside those which have special designations. Fred. Olsen Renewables welcomes this and believes it is the only basis on which the Welsh Government's 2030 targets will be met.

Fred. Olsen Renewables believes that the policy wording outlined in policy 10 should be applicable to all areas outside NPs and AONBs (i.e. those currently defined as the 'red' areas within Welsh Government's proposed 'traffic light' approach), with the application of an appropriate criteria based approach. Industry analysis indicates that a significant proportion,

if not the majority, of development will have to come from areas outside the currently defined Priority Areas.

It is recognised that there are areas protected for their landscape or ecological value that are not suitable for renewables developments, and the appropriate designations are in place to protect these areas. Fred. Olsen Renewables favours a sensible criteria-based policy whose *ethos* carries a presumption in favour of energy generation development and landscape change in areas outside those with statutory designations. This would seem more aligned with the step-change required to meet the challenge of the declared climate emergency and net zero ambition. It is also the approach inferred by Planning Policy Wales:

> *"Planning authorities should give significant weight to the Welsh Government's targets to increase renewable and low carbon energy generation, as part of our overall approach to tackling climate change and increasing energy security. In circumstances where protected landscape, biodiversity and historical designations and buildings are considered in the decision making process, only the direct irreversible impacts on statutorily protected sites and buildings and their settings (where appropriate) should be considered. In all cases, considerable weight should be attached to the need to produce more energy from renewable and low carbon sources, in order for Wales to meet its carbon and renewable targets."*

Fred. Olsen Renewables has consistently advocated that 'lines on maps' should not form the basis of subsequent iterations of planning policy following TAN8. The SSA model in TAN8 engendered considerable ill-will within local communities and host authorities for whom landscape change, both in terms of renewable energy projects and their associated grid connections, were viewed as a *fait accompli*, creating entrenched opposition to renewable energy (onshore wind) development. It is regrettable therefore that industry concerns relating to the proposed 'priority areas' model do not appear to have been taken into account.

TAN8 SSAs AND THE 11 SOLAR AND WIND ENERGY PRIORITY AREAS IN THE NDF INTRODUCTION

As the NDF will supersede TAN8and the SSAs, it is noted that there are a number of inconsistencies between the prescription of the TAN8 SSAs and the draft NDF Priority Areas. This is a significant issue as it raises question marks over the validity of the exercise undertaken by Arup (to identify the Priority Areas) and the subsequent confusion this will bring to the policy framework if it is adopted. This is especially the case for current developments that are within TAN8 SSAs but not in a Priority Area under the NDF, despite the significant investments towards developing these sites and the huge opportunities they offer to the short term deployment of wind power.

Whilst industry recognises that the identification of SSAs and their refinement were based on typical market-available turbine tip heights at the time, it nevertheless highlights a number of serious flaws and inconsistencies in the methodology which led to the identification of the Priority Areas for the draft NDF, as follows:

TAN 8 Annex D Study of SSA A

In 2005, Arup undertook a refinement assessment of SSA A on behalf of Denbighshire County Council and Conwy County Borough Council. Priority Area 15 excludes large areas around Llyn Brenig which are within the SSA and refined boundaries, including Pant y Maen

(consented), Brenig (operational) and the majority of Alwen Forest (option recently signed with NRW/DCWW). Existing, operational or consented wind farms were not included as an Overlay layer in the Stage 1 and 2 reports for the NDF so were therefore not a factor in the identification of the Priority Areas. This is clearly a shortcoming with regard to identification of the priority areas.

TAN 8 Annex D Study of SSAs B & C

In 2008 Arup undertook a refinement assessment of SSAs B and C on behalf of Powys County Council. Whilst the refined boundaries were not formally adopted through the LDP it clearly demonstrates inconsistencies between the TAN8 approach and the reports informing the draft NDF, including:

- **SSA B** - the TAN8 and Refined SSA boundaries include Carnedd Wen (recommended for approval by an Inspector), Dyfnant Forest and Cemmaes 3 but these sites are not within Priority Area 5
- **SSA C** - the Refined SSA boundary includes the consented Llandinam repowering project but is not within Priority Area 6

TAN 8 Annex D Study of SSA D

In 2007 Arup undertook a refinement assessment of SSA D on behalf of Ceredigion and Powys County Councils. The refined boundary is almost entirely within the SSA yet both boundaries do not feature within a Priority Area, primarily due to Landmap valuations of sensitivity.

TAN 8 Annex D Study of SSAs E & F

In 2006 Arup undertook a refinement assessment of SSA E and F on behalf of a consortium of five South Wales local authorities. The refined boundaries were formally adopted through the LDP process for Neath Port Talbot and Bridgend. Inconsistencies between the TAN8 process and the reports informing the draft NDF include:

• Refined SSA E consists of the western and eastern parts of SSA, whilst the Priority Area 14 shows the eastern refined SSA boundary to be solar only

• Refined SSA F covers Y Bryn (recently awarded NRW tender for a wind energy scheme) yet the Southern block is excluded from Priority Area 14 due to historic landscape

• There are areas within Priority Area 14 defined as solar only which are in areas of commercial plantation and which would not be suitable for such development; it would be unlikely developers would find it viable to clear-fell commercial plantation for solar farms because of the significant landscape changes, the loss of extensive valued commercial forestry, difficulty of the resulting land cover, and excessive costs.

• Pen y Cymoedd wind farm (228MW), one of the largest operational schemes in the UK, is located largely within a Solar Only area in Priority Area 14. This evidences the often erroneous and contradictory mapping exercise conducted in delineating the priority areas.

TAN 8 Annex D Study of SSA G

In 2006 Arup undertook a refinement assessment of SSA G on behalf of Carmarthenshire County Council. The refined boundary is entirely within the SSA. Priority Area 11 is a significant area and does include all of the SSA, however the application of a 750m housing buffer highlights very limited potential outside of the already developed areas of the SSA.

ANALYSIS OF THE 11 SOLAR AND WIND ENERGY PROPOSED PRIORITY AREAS

RUKC has conducted a mapping exercise to establish the likely developable opportunity (% of unconstrained area) of the 11 priority areas identified as 'wind only' priority areas. (i.e. it excluded priority areas 2, 4, 12 and 13 which are designated as 'solar only' priority areas). The constraints / criteria it applied for this exercise are detailed in their own submission and Fred. Olsen Renewables fed in to the process. Details of the study are not repeated here but the outcome is that there is very little development considered practical within the priority areas with less than 5% of the area unconstrained.

From our own site feasibility work carried we can confirm that we have identified numerous sites outside the priority areas that would be considered viable in technical, environmental and planning terms.

Comments on draft NDF Policy

It is considered that the climate emergency is not given sufficient weight within the document. Tackling the climate change emergency should run through all the outcomes in the NDF rather than just the last one, Outcome 11.

As a general comment, it is considered that the NDF should have numbered paragraphs to make reference to the document easier and clearer in practical terms, particularly in the decision-making process. Page 6 of the NDF document notes that the NDF is the "*highest tier of development plan*" and that it comprises the framework which will provide the basis for Strategic Development Plans (SDPs) and Local Development Plans (LDPs) at local planning authority (LPA) level. Within the current draft, the NDF makes it clear that SDPs and LDPs must be in accordance with it, however, its status in decision-making on developments of national significance (DNS) is not explicitly set out.

It is Fred. Olsen Renewables view that the NDF's status in the development plan hierarchy and the decision-making process (and the weight that should therefore be attached to it) must be clearly set out in the document in the interests of clarity and certainty for all stakeholders, including decision-makers, statutory consultees, members of the public and applicants (and their investment partners).

The proposals for a new infrastructure planning regime in Wales state that decisions on nationally significant scale development, i.e. DNS, will be taken in accordance with the NDF. There should be an explicit and unequivocal statement in the NDF that for any applications falling within the DNS regime, the NDF constitutes the development plan in line with Section 38(4) of the Planning & Compulsory Purchase Act 2004 (PCPA 2004), and that DNS decisions made by the Welsh Ministers must be in accordance with the NDF unless material considerations indicate otherwise (s38(6) PCPA 2004). It is imperative that this is stated explicitly within the NDF.

Extracts from the NDF

> *"The NDF is a spatial plan, which means it sets a direction for where we should be investing in infrastructure and development for the greater good of Wales and its people."* NDF Introduction
> *"The spatial strategy is the overarching framework for deciding where to locate nationally significant developments, in order to maximise their contribution to the well-being goals."* NDF Introduction

Fred. Olsen Renewables is wholly supportive of the need for national policy to set the direction for future infrastructure investment. However, although it is referred to as a "spatial plan", the NDF is only spatial in respect of policies relating to the development of wind and solar energy (Policies 10, 11 and 12). We question why renewable energy is disadvantaged in this way.

Beyond the 'traffic-light' approach to onshore wind and solar in Policies 10, 11 and 12, the NDF makes provision for other types of renewable generating stations over 10MW (Policy 13). It is Fred. Olsen Renewables' view that the NDF should also include policies relating to all types of DNS not just renewable energy generation projects. As the development plan for DNS applications (which is intended to set a framework through to 2040), the NDF should proactively set policy for all types of infrastructure, not simply react to ones that are currently on the DNS register.

The lack of a solid decision-making framework for all types of DNS is a major short-coming, particularly when LDPs will typically not include policy provisions against which these types of development can be determined. It is acknowledged that it may not be possible to include policies relating to these types of projects in the first iteration of the NDF, but they should, at the very least, be included at the first NDF review

Extract from NDF

> *"The NDF should be read alongside Planning Policy Wales (PPW) which provides planning policy on an all-Wales basis. The NDF complements PPW, with a shared commitment to placemaking and by setting out the spatial priorities for planning and development where national-level consideration is required."* NDF Introduction

The relationship between the NDF and PPW also needs to be clarified. In decision-making terms, and in line with s38(6) of the PCPA 2004, the NDF constitutes the development plan and PPW constitutes a material consideration. It cannot be said therefore that the NDF "*complements*" PPW. Fred. Olsen Renewables recommends that the relationship between the policy documents is made clear and reference is made to s38 of the PCPA 2004 to remove any ambiguity. The NDF should make a clear statement that DNS applications will be determined in accordance with the NDF unless material considerations, including PPW, indicate otherwise.

With respect to the types of large scale energy developments that will fall to be determined within the Developments of National Significance (DNS) regime, the NDF defines these as:

- All onshore wind generation over 10 megawatts (MW); and

- Other renewable energy generation sites with generating power between 10MW and 350MW".

This statement is inaccurate as the DNS regime includes any energy generation between 10MW and 350MW, not just renewables. Therefore, Fred. Olsen Renewables requests that the word '**renewable'** in the second bullet point is deleted. Fred. Olsen Renewables also considers that reference should include overhead grid connections of up to 132kv.

It is critical that Wales continues to have secure and reliable supplies of electricity throughout the transition to a low carbon economy, whilst also replacing existing power plants due for closure. To manage the risks to achieving security of supply, sufficient electricity capacity (including a greater proportion of low carbon generation) is required to meet demand, and this requires a diverse mix of technologies and fuels.

The National Infrastructure Commission (NIC) published its National Infrastructure Assessment (NIA) in July 2018, which presents recommendations for a programme of upgrades to the nation's infrastructure. The NIC believes there is significant scope to build resilience through intelligent deployment of a mix of renewables working alongside sources of flexibility such as storage, interconnectors with other countries, and demand side response. It is acknowledged that the NIA predominantly applies to England, but there are clear parallels to be drawn with Wales in the absence of any similar assessment by the National Infrastructure Commission for Wales (NICW).

As currently drafted, the NDF does not include any reference to the range of technologies required to deliver a resilient and flexible energy system. Given the Welsh Government's target to generate 70% of electricity consumption from renewable energy by 2030, the absence of policies or narrative relating to conventional generation (i.e. the remaining 30%), storage and grid balancing is a significant omission. It also fails to recognise the potential for hybrid projects to come forward which incorporate wind, solar and energy storage.

A consistent approach to the Welsh Government's position on non-devolved projects[14] would also be welcomed – in this context, the NDF only mentions nuclear projects. Although the Welsh National Marine Plan (WNMP) is the primary development plan for devolved offshore projects (<350MW), the NDF should include support of non-devolved projects (>350MW), subject to acceptable environmental impacts, including offshore wind (as is currently the case at paragraph 3.1 of TAN8) and tidal lagoons. Local planning authorities and the Welsh Ministers are statutory consultees for non-devolved projects determined under the Planning Act 2008. Additionally, planning permission is likely to be required for onshore installations associated with offshore projects and the NDF should also include narrative in support of such installations subject to acceptable environmental impacts. In these cases, the synchronisation of onshore and offshore consenting (including marine licences) would be welcomed.

The lack of policy for non-devolved projects creates a practical consenting difficulty. The decision making process for non-devolved energy generating projects is reliant on s104 and s105 of the Planning Act 2008. These sections state that application for development consent for nationally significant infrastructure projects (NSIPs) should be determined in accordance with the relevant National Policy Statement (NPS) where one is designated (s104), or important and relevant matters where there is no designated NPS for the

technology proposed (s105). If determined under s105, the important and relevant matters would include the NDF, SDPs and LDPs and if these are silent on the type of technology proposed (for example, this is the case for hydroelectric pumped storage) then the policy case which supports schemes that could be critical to an energy system with a high proportion of renewables is extremely unclear. It is essential that the NDF provides policy support for all technologies required as part of a renewables-based energy system whether they are DNSs or NSIPs.

The NDF adopts a *'clear traffic light-based approach to its policy on large scale and wind and solar renewable energy projects'*. According to the NDF, a strategic review of landscape impact identified the Energy Priority Areas as the most appropriate locations to accommodate landscape change. However, from Fred. Olsen Renewables' review of all of the consultation documents, it is clear that landscape and visual were not the only constraints applied. This is confirmed by Paragraph 3.1 of ARUP's Stage 1 Report (Development of Priority areas for wind and solar energy) which sets out that "*The development of the methodology has been an iterative process, with input from stakeholder workshops, Arup experts, stakeholder engagement, and meetings with the Welsh Government core team".*

Fred. Olsen Renewables contends that the traffic light approach is misleading, fails to provide a clear position on where development will come forward and should be removed from the NDF in favour of criteria based policies.

The draft NDF sets out that the spatial strategy is for large scale and solar development to be directed towards the defined Energy Priority Areas for Wind and Solar. These areas provide a presumption in favour of large scale on shore wind and solar energy development, and an acceptance of landscape change and a focus on maximising benefits and minimising impacts.

Whilst Fred. Olsen Renewables recognises the Welsh Government's desire to identify suitable areas to assist in determining where grid upgrade and reinforcement may be required to enable the deployment of renewables, it is concerned that the current policy drafting may suggest that the identified areas are developable in their entirety. This is very far from the case as industry analysis indicates less than 5% of the identified areas are suitable for the deployment of renewable energy at the scale required to meet Welsh Government targets for decarbonisation.

The priority areas also fail to account for the locations of operational wind farms which may need to be repowered during the NDF's lifetime. This raises serious concerns over the robustness of the studies that informed the Energy Priority Areas.

Fred. Olsen Renewables contends that it would be far more effective to provide a criteria-based approach for large scale energy development which allows developers to assess site constraints, characteristics and impacts and provide a robust and justifiable case for development through EIA.

This is an approach that has been taken for energy NSIPs in England utilising the National Policy Statements (NPS) which, aside from the NPS for nuclear, do not include any spatial allocations. The NSIP regime has been running for over 10 years and both the regime and the NPSs have been praised for the clarity and certainty they provide.

Fred. Olsen Renewables believes the NDF should adopt a more positive position with respect to renewable energy development. It is our view that the priority areas should be removed from the NDF entirely. Proposals across Wales should be given the same level of 'in principle' support as is provided under Policy 10 (as currently drafted) with the exception of the areas identified under Policy 12.

The supporting text to Policy 10 (as drafted) places an importance on the ability of the Energy Priority Areas to deliver in order to meet the Welsh Government's renewable energy targets and that "the implementation of developments *within the Priority Areas* will be monitored". The removal of the Priority Areas will allow development to come forward across Wales and this will need to be monitored.

Fred. Olsen Renewables strongly believes that the traffic light approach should be deleted as the terminology used is unhelpful and doesn't reflect the WG's intent. The NDF presents a 'green light' for the priority areas but the current drafting suggests that areas with 'amber lights' are more closely aligned with 'red' than 'green'. Fred. Olsen Renewables is confident that this was not the intention of the NDF and believes it can be rectified by amending Policies 10 and 11 for the following reasons:

- Policy 10 refers to a presumption in favour of development of large-scale onshore wind and solar development, however, to meet the Welsh Government's targets, this presumption should apply to all renewable and low carbon energy development proposals;
- Policy 10 needs to include a specific statement that the need for large scale renewable and low carbon energy development, together with grid connections and other technologies that will facilitate its deployment, is established and accepted and does not need to be demonstrated at application stage;
- the significant weight that is given to a proposal's contribution to reducing greenhouse gas emissions (not just Wales' emissions) and meeting decarbonisation and renewable energy targets should be applied to all renewable energy policies, and any other technologies which facilitate their deployment;
- Policy 10 also sets out that planning applications must demonstrate how local social, economic and environmental benefits have been 'maximised' that adverse impacts must be 'minimised'. This wording creates uncertainty for developers and decision-makers as no definition is provided as to how these thresholds can be achieved. The test is not standard in planning and will simply create confusion and disagreement. This is a policy flaw that needs to be addressed.
- The supporting text to Policy 10 should also include reference to the potential environmental benefits that large scale renewable energy projects can deliver, such as contributing to resilient ecological habitats, restoring degraded peatlands and restoring semi-natural grasslands, catchment management.

The points raised above clearly demonstrate that clarification is required. Fred. Olsen Renewables recommends that careful consideration is given to the rewording of Policy 10 and the deletion of Policies 11 and 13. Fred. Olsen Renewables welcomes the commitment to issue "*further guidance on the development of on-shore wind and solar energy schemes…"* and would welcome the opportunity to assist the Welsh Government in preparing this guidance.

It is Fred. Olsen Renewables's view that the changes suggested provide the Welsh Government with a significant opportunity to ensure the effective implementation of the NDF by providing strategic 'in principle' support for renewable energy generating development and clearly establish the need for such development across Wales. The detailed policy guidance could then establish the matters to be assessed in any planning application made without the need for any spatial element in a similar approach to the energy NPSs in England. Fred. Olsen Renewables would suggest that the Welsh Government considers the assessment criteria included within Annex C of TAN8 and the energy NPS as a starting point for the impacts to be assessed in connection with large scale energy development.

Policy 11 refers to Onshore Wind and Solar Energy outside of the Energy Priority Areas. As discussed above, Fred. Olsen Renewables understands that the Welsh Government's objective is for the NDF to provide policy support for all renewable and low carbon energy developments outside of the Priority Areas, but neither Policy 11 nor Policy 13 state this explicitly. Fred. Olsen Renewables therefore suggests the following policy amendments:

- Delete policy 11 and 13 entirely and apply Policy 10 (subject to amendment to a criteria based approach) to renewable and low carbon energy development across the whole of Wales (except the areas covered by Policy 12)

5. Suggested policy amendments

Fred. Olsen Renewables' suggested new Policy 10

The Welsh Government supports large scale onshore renewable and low carbon energy development. There is a presumption in favour of development for these schemes across Wales outside of the areas identified by Policy 12. With respect to the development of large scale wind and solar, there is also an associated acceptance of landscape change for schemes outside the areas identified by Policy 12.

When determining planning applications for large scale low carbon and renewable energy development, significant weight will be given to the proposal's contribution to:

- reducing greenhouse gas emissions and meeting decarbonisation and renewable energy targets
- delivering wider environmental, social and economic benefit
- *satisfying an identified need for renewable and low carbon energy infrastructure*
- facilitating the deployment of large scale renewable energy development

Planning applications must demonstrate the proposal is acceptable in social, economic and environmental terms and that there are no unacceptable adverse effects on, or due to, the following (where relevant to the technology proposed):

- landscape and visual;
- biodiversity, ecology and nature conservation
- geo-environmental;
- historic environment;
- traffic and transport;
- noise and vibration
- residential amenity;
- Socio-economic

- Air quality and emissions
- telecommunications, aviation and defence;
- hydrology, hydrogeology, the water environment and flood risk;
- waste; and
- cumulative impact.

Suitable access to the site for construction and maintenance purposes must be provided. Plans must also be in place for the end of the development's lifetime, including the decommissioning of the site at the end of its operational life.

It is also suggested that the following text is added to the supporting text to Policy 10 to provide clarity to the issues to be considered in the planning balance:

In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the Welsh Ministers should take into account:

- *it's potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and*
- *it's potential adverse impacts, including any long-term and cumulative adverse impacts, as well as their reversibility and any measures to avoid, reduce or compensate for any adverse impacts.*

In this context, the decision-maker should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels.

In summary, Fred. Olsen Renewables agrees with the objectives of NDF Policies 10 – 14 but considers that the support provided to energy generating development needs to be strengthened and a recognition of the mix of technologies required to deliver a flexible, resilient, low carbon energy system needs to be added. The NDF must also include a policy against which devolved grid projects (up to 132kV) can be determined. If the NDF is to facilitate the delivery of energy generation at the scale required to meet the Welsh Government targets for decarbonisation, it is critical that policies relating to grid connection are included in the NDF.

The NDF must include a presumption in favour of renewable energy development in all areas except those identified under Policy 12.

Fred. Olsen Renewables supports the regional policies included within the draft NDF but considers that all regions have the potential to deliver large scale energy generation and that this should be reflected in the policies and the supporting text.

Fred. Olsen Renewables supports Policy 22 (North West Wales and Energy), however it is noted that the supporting text refers to determining nuclear energy generating stations in this region. Applications for nuclear energy generating stations (which are likely to exceed 350MW) are not devolved and therefore this wording needs to be carefully reviewed.

The supporting text also states that "*the planning system has a key role in supporting renewable energy and ensuring the North plays its part in decarbonising society, and that the region has a strong potential for generating wind, solar and tidal energy*". It also refers to the positive impacts the nuclear sector can present in terms of investment, skills and training. Immediately following this statement, the text highlights that the 'Anglesey Energy

Island Programme' seeks to co-ordinate action around new energy developments. Fred. Olsen Renewables is of the view that the policy appears to be overly focussed on nuclear, without making reference to other energy developments and the benefits they can deliver. This policy needs to be reworded to emphasise the economic benefits of other energy developments including, for example, pumped hydro and offshore wind.

The NDF should also clarify that local planning authorities (LPAs) cannot adopt supplementary guidance that contradicts the NDF, for example through landscape capacity/sensitivity studies that constrain development. Without this, there is a risk that the NDF could be diluted sequentially through the hierarchy of plans and restrict large scale renewable energy development.