

Draft National Development Framework

1. NDF Outcomes (chapter 3)

Q1. 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?

No Response

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

No Response

2. Spatial Strategy (policies 1 - 4)

Q3. 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...

No Response

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

No Response

3. Affordable Housing (policy 5)

Q5. 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?

No Response

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

No Response

4. Mobile Action Zones (policy 6)

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

No Response

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

No Response

5. Low Emission Vehicles (policy 7)

Q9. 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?

No Response

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

No Response

6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

No Response

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

Q12. 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	Don't know	No opinion
Large scale wind and solar developments		X					
District heat networks							

Q13. 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?

NextEnergy Capital Group is one the leading international investment and asset managers focused on the solar sector. In the UK, the NextEnergy Solar Fund is listed on the London Stock Exchange and has invested over £894 million into operating solar assets, constructing a portfolio of 87 operational sites, with a total capacity of 691MW in the UK.

There is great potential for Wales, in particular the south of the country, to capitalize on its opportunity to become a global leader in low carbon energy development where the nation's industrial legacy offers suitable electrical grid availability, high quality solar radiation and suitable landscape for responsible and sustainable solar development. NextEnergy Capital notes the ambition for the identification of priority areas of low carbon energy development where Welsh Government will welcome the promotion of appropriate schemes.

It should be noted that in this new landscape of subsidy free solar development there are increasing constraints on commercially viable projects. Since the removal of the subsidies and in a business model without support, investment costs for a project must be reduced by more than 50% to reach acceptable commercial viability. This is a new environment for solar schemes and the industry is adjusting to the new status quo, understanding how to bring schemes forward to deployment on a merchant-only basis. The core delivery supply chain and cascading benefits in the region are still emerging and schemes are being brought forward that will establish employment opportunities for schemes over their lifespan. This will create efficiencies across the value chain and help develop a sustainable industry with a long-term horizon.

These development framework priority areas are to be welcomed, however it should be noted that these represent, in NextEnergy Capital's view, a broad brush approach to today's constraints mapping, with readily available grid connection capacity and locations suitable to development not included in the representative graphics. This creates disconnection between the priority areas and the areas that have the most potential for viable projects. In a subsidy-free market, there are very subtle differences between a viable and non-viable project, especially at this very early stage where subsidy-free solar is making its very first steps and every restriction has a big impact on viability.

As the market matures and installed capacity emerges onto the system, it will be more viable to sustain and built-out within the priority areas. But there may be sites that are viewed as more marginal today, but in the future may become more suitable to accommodate and enhance biodiversity and net environmental gain. We recommend that there is flexibility to review the priority areas for development in the future and enable a hinterland concept to support schemes on the margins or in areas where sites with appropriate grid connections and generating conditions become available due to changing uses of the landscape.

A failure to do so might result in previous industrial sites becoming redundant and opportunities to rejuvenate locations with low carbon energy development being blocked due to rigidity of the priority low carbon energy development zones. NextEnergy Capital would welcome the opportunity to discuss the priority area mapping further with Welsh Government.

8. The Regions (policy 16)

Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?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.

No Response

9. North Wales (policies 17-22)

Q15. 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?

No Response

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

Q16. 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?

No Response

11. South East Wales (policies 27-33)

Q17. 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?

No Response

Q18. 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.

No Response

12. Integrated Sustainability Appraisal

Q19. 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.

No Response

13. Habitats Regulations Assessment

Q20. 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?

No Response

14. Welsh Language

Q21. 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?

No Response

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: 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 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.

No Response

15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

NextEnergy Capital would seek to engage with Welsh Government to inform and explain the thinking behind the solar and renewable energy priority areas.

16. Are you...?

Q24. Are you:

Submitting a response on behalf of an organisation

Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Andrew Turner
Organisation (if applicable)	NextEnergy Capital
Preferred contact details (email/phone/post)	████████████████████

Q26. If you want to receive a receipt of your response, please provide an email address.
Email address

████████████████████

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response