

Consultation Response Form

Your name	Stephen W Snowdon
Your address	[REDACTED]
Preferred contact details (email/phone/post)	[REDACTED]
Organization (if applicable)	Peel L&P Energy 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	Don't Know	No Opinion
						<input checked="" 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	Don't know	No Opinion
<input checked="" type="checkbox"/>					

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

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	Don't know	No opinion
Urban area (Policies 1,2 & 3)							<input checked="" type="checkbox"/>
Rural areas (Policy 4)							<input checked="" type="checkbox"/>

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

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	Don't know	No opinion
						<input checked="" type="checkbox"/>

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	Don't know	No opinion
						<input checked="" 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	Don't know	No opinion
	<input checked="" type="checkbox"/>					

Peel L&P Energy fully supports the roll-out of charging infrastructure to support the transition to greater use of ultra-low emission vehicles (ULEVs). Greater use of ULEVs will also have positive health impacts in terms of air quality.

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

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	Don't know	No opinion
						<input checked="" 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	Don't know	No opinion
Large scale wind and solar developments		<input checked="" type="checkbox"/>					
District heat networks	<input checked="" 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?

Peel L&P Energy Ltd is encouraged by the approach taken by the Welsh Government in relation to its Priority Areas, especially that they are not expected to deliver all of the capacity required by the NDF and the recognition that development will – by necessity – have to take place outside of the Priority Areas. It is further encouraged by the criteria-based approach to development within the “amber” areas advocated by the NDF.

Peel L&P Energy Ltd does have some reservations, however.

The original spatial approach to onshore wind development as set out in TAN8 appears to have underperformed significantly, with an approximate under-delivery of nearly 1.4GW against the original aspiration. The TAN8 areas were largely defined using landscape character areas as the predominant criterion and the methodology used by Arup to inform the new areas appears to have adopted a similar approach.

Although the new Priority Areas are sensibly much larger than those in TAN8, the Arup methodology has not included many of the constraints that developers of onshore wind would ordinarily factor into their assessment of a site. For example, noise buffers around residential properties, ecological buffers around water courses, other features and any locally designated sites. This means that the capacity of Priority Areas will be considerably smaller than that depicted on page 42 within the NDF.

The “amber” areas (not specified within the NDF) will have no explicit support from Welsh Government but will be the areas that will end up delivering the most installed capacity, not the Priority Areas. In the absence explicit policy support within the “amber” areas, it is very likely that achieving the 2030 target of 70% electricity being generated from renewable sources will be in jeopardy.

Several of the Priority Areas are shown as being potential suitably for both onshore wind and ground-mounted solar arrays. Peel L&P Energy would suggest that the ‘further guidance’ alluded to in the accompanying text to policy 10 should expand upon the idea of co-location.

Peel L&P Energy would also suggest that the ‘further guidance’ provide direction on what the Welsh Government wants to encourage regarding ‘local ownership’, as this can take several forms, e.g. ownership of turbines outright, shares in the wind farm as a whole, simple profit-sharing arrangements. It is also unclear whether an agreed ‘local ownership’ model for a wind farm or solar proposal will attract any weight in the application determination process. For example, local authorities in Scotland frequently have policies relating to ‘community benefit funds’ and that the existence of such a fund is a material consideration to be included in the planning appraisal.

Peel L&P Energy supports the aspiration to more widely develop district heat networks and agrees that the threshold of 100 residential units within mixed-use schemes is a sensible starting point.

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?

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

Peel L&P Energy would only observe that a key issue in meeting the targets of the NDF will be the speed with which any Strategic Development Plans can be prepared. As observed earlier in §7, numerous onshore wind farms and ground-mounted solar arrays must be approved no later than 2027 to meet the 2030 target. Determination of applications must not be delayed pending production and ratification of any Strategic Development Plans for the Regions as this will result in the target going unmet.

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	Don't know	No opinion
						<input checked="" type="checkbox"/>

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?

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

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	Don't know	No opinion
						<input checked="" 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.

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.

Peel L&P Energy Ltd has no observations to make in this regard

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?

Pee1 L&P Energy Ltd has no observations to make in this regard

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?

Peel L&P Energy Ltd has no observations to make in this regard

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?

Peel L&P Energy Ltd has no observations to make in this regard

16. Are you...?

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

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

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