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Planning Policy Branch  
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Date: 15 November 2019  
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15<sup>th</sup> November 2019

Dear Sirs,

**Response to the Welsh Government consultation on the Draft National Development Framework 2020-2040**

This response is made on behalf of the RWE Generation UK plc ("RWE"). RWE owns, operates and maintains a 8.6GW of firm, flexible thermal capacity including the UK's largest and most efficient fleet of gas-fired Combined Cycle Gas Turbine (CCGT) plant, including 2.2GW Pembroke Power Station in Wales (commissioned in 2012). The fleet also includes 1.56GW Aberthaw coal-fired power station in Wales, which will close at the end of March 2020.

RWE is part of RWE AG Group, whose operating companies include the newly created RWE Renewables GmbH. RWE Renewables was created following the transaction with E.ON which, once fully complete, will see E.ON and innogy renewable assets integrated into RWE. At the time of writing, innogy renewable assets are expected to be integrated in Q12020. Innogy Renewables UK Ltd have prepared a separate response to this consultation, which is fully endorsed by RWE.

**Overview**

Thank you for the opportunity to comment on these proposals regarding the National Development Framework ("NDF") for Wales. RWE generally supports the aims of the 11 Outcomes however feels that the NDF lacks any consideration of the enabling importance of an energy mix in securing the delivery of those outcomes. This need is clearly recognised in the National Policy Statements for projects in England and Wales that fall within the scope of the major infrastructure under the Planning Act 2008. As a spatial plan, we notice that the proposed NDF also fails to consider non-renewable technologies that are within the scope of planning decisions under Development of National Significance ("DNS") thresholds.

Please find Attachment 1 to this letter setting out the key points from RWE in relation to the draft NDF and proposed policies. Please do not hesitate to contact me if you require any further information.

Yours faithfully,

[REDACTED]

## Attachment 1

### RWE's response to the Welsh Draft NDF Consultation – Key points

#### The role of the NDF and policy consistency

The role of the NDF and how it should fit in the hierarchy of applicable policy documents warrants additional clarification. It is not clear *exactly how* the NDF will work with PPW and existing Technical Advice Notes (TANs) and how consistency of approach will be achieved. There also needs to be clarity on the hierarchy of the Welsh planning policy documents and any applicable UK policy documents such as National Policy Statements.

As an example, for overhead lines, there will be a situation where some projects will be subject to a DNS or future WIC and decisions will be taken based on Welsh Government policy documents such as the NDF, PPW, etc., while other similar projects for different end purposes will be subject to UK Government policy which may differ significantly from Welsh policy. Inconsistency may cause misunderstandings, confuse the affected public and possibly invite legal challenge. The status of National Policy Statements for the purposes of DNS and subsequently WIC applications needs to be clarified.

In addition, we suggest that the NDF should include narrative in support of non-devolved projects (>350MW) in accordance with the NPSs. Local planning authorities and the Welsh Ministers are statutory consultees for non-devolved projects determined under the Planning Act 2008.

#### Energy mix

The NDF does not provide any support or clarification (either spatially or in a criteria-based policy) regarding any type of Development of National Significance (DNS) other than *renewable* generating stations over 10MW. The NDF as currently drafted therefore fails to be a solid decision-making framework for any type of non-renewable generating stations between 10MW and 350MW; or above ground electric lines up to 132kV; etc.

It is critical that Wales continues to have secure and reliable supplies of electricity throughout the transition to a low carbon economy. Over time, an increasing amount of capacity will come from low carbon generation, including wind and solar. To manage the risks associated with large shares of intermittent and variable generation, sufficient firm, flexible capacity is required to ensure security of supply. This will include innovative storage solutions such as batteries, in addition to gas-fired capacity. Increasingly over time, this firm flexible capacity will have reduced impact on CO2 emissions as it will be only operating as a 'back up' to low carbon generation.

#### Policy 13

Policy 13 in the draft NDF applies to all renewables *except wind and solar*. There is no specific policy support for hydro. This is an important omission as some existing hydro assets are located in National Parks and the NDF as drafted seems to be silent on whether hydro is compatible with national park and AONB purposes, although it

states (Policy 12) that large scale wind and solar are not. RWE believes, in support of innogy, that the new run of river hydro (i.e. no reservoirs) can be acceptable in these areas while new schemes in national parks & AONBs should be judged on their individual merits.

RWE also believes that there should be a clear presumption that existing hydro assets wherever situated should be maintained indefinitely, enhanced and redeveloped where appropriate, making best use of existing infrastructure where existing mechanical and electrical plant is life-expired. To be noted that there are hydro schemes in North Wales which are still producing renewable electricity after over 100 years and it is important that the continuity of this technology is acknowledged in the proposed NDF.

### **Policies 14 and 15**

The above policies support the development of district heating networks, but are silent on the fuels which may be used for this purpose. This policy implies the need for some sort of combustion plant, whatever the fuel to be used. This type of development is likely to involve the use of gas in practice especially in an in-town environment where the delivery, handling and storage of other fuels (e.g. pelletised biomass or the removal of ash) may be problematic. This is another reason, in addition to the need of a health energy mix discussed above, that the draft NDF should include the use of fossil fuel as appropriate. The use of combined heat and power plant to provide the heat for district heating schemes should be supported where economically viable.

### **Policy 25**

RWE supports Policy 25 in relation to the Milford Haven waterway and its surroundings. In our view, this policy should also refer to supporting and facilitating developments which seek to enhance and improve the medium to long term economic viability of existing investments and facilities in the area.