

# 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?

Agree

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

Agree with most of them

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

We support the 11 Outcomes set out in the proposed NDF and the Welsh Government's ambition to achieve them in the next 20 years. We also support the view that many of the outcomes are inter-related and inter-dependent, and have the potential to improve places and well-being across Wales. The issue of climate change is the clearest example of a cross cutting theme and is a key thread that links together many of these outcomes. Given the importance of new Net Zero targets, we consider that all outcomes of the NDF should be designed to contribute in some way towards mitigating the impacts of climate change as this would recognise the vital importance of this issue. As such, it is suggested that the final NDF should demonstrate a more ambitious outlook with a clear focus on the climate emergency and taking action to tackle it. Planning Policy Wales 2018 (PPW) sets clear priorities for renewable and low carbon energy and aligns with the Well-being of Future Generations Act (2015). The NDF should seek to build on the low carbon principles established in PPW, by creating a supportive policy and decision-making framework around responding to the net zero challenge. We would also encourage the Welsh Government to undertake an evidence-based exercise to understand what actions are required to deliver net zero across all industries and sectors.

## 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...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)							X
Rural areas (Policy 4)							X
							X

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 opinion

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 opinion

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?

Neither agree nor disagree

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?

We welcome the Welsh Government's support for the development of an EV charging network and for encouraging EV uptake. By way of complementing this, we consider that the NDF should aim to ensure that the increasing uptake of electric vehicles is supplied by clean, low carbon electricity and that supportive policies are in place to help the deployment of renewable developments across Wales.

#### 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?

Neither agree nor disagree

#### 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			X				
			X				

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?

Whilst there is some positive recognition within the draft NDF around the contribution that renewables can make to tackling climate change, we are concerned that the support in the headline policy text is not reflected in the detailed policies.

Specifically, in relation to the deployment of renewable generation projects, we have significant concerns over the proposed designation of Priority Areas for Wind and Solar energy. These 'Priority Areas' are largely unsuitable for onshore wind when criteria such as wind resource and housing buffers are applied. Analysis by RenewableUK (RUK) Cymru2 suggests that only c.5% of the total area of the eleven Priority Areas would be viable for the commercial development of onshore wind. In the areas which are viable for the development of onshore wind, it is likely that the vast majority of all development opportunities would relate to projects of less than 10MW capacity, and therefore would not be within the NDF's remit. There is a considerable risk that the NDF will not promote the deployment of large-scale onshore wind and solar developments and would hinder the delivery of renewable developments to meet energy targets in Wales.

The RUK Cymru analysis also confirms that a significant proportion of the locations that the renewables industry sees as having potential for wind and solar developments actually fall outside the green priority areas and within the proposed amber areas. The proposed Policy 11 relates to these amber areas and sets a much higher threshold of acceptability for development. It follows that the consenting risk for developments will be higher in amber areas which may in turn have an impact on future renewables investment in Wales and support for the established Welsh supply chain.

The Wind and Solar Energy Assessment commissioned and used by the Welsh Government to inform the content of the draft NDF does not appear to consider key aspects, such as wind resource, when identifying future area-based deployment scenarios. Also, it does not seem to factor in key restrictions which the renewables development industry needs to consider, for example, proximity to housing developments.

Given the above limitations of the study, there are concerns that the identification of the proposed Priority Areas is not based on a sufficiently robust assessment and, as a result, risks significantly hindering the drive to meet the Welsh Government's stated target for 70 per cent of electricity consumption to be generated from renewable generation by 2030. Further, in this regard, we would question whether this target remains appropriate given the recent announcement of a legally binding target to achieve a 95% carbon emissions reduction by 2050.

As wind and solar are the only large scale renewable technologies currently capable of mass deployment on land in Wales, the draft NDF must take due cognisance of this apparent weakness in the current assessment in reconsidering the proposed approach to Priority Areas.

We would therefore suggest that consideration is given to replacing the Priority Area approach with a criteria-based approach. A single policy reflecting the supportive wording in Policy 10, and the removal of Policy 11, would ensure amber and green areas are replaced by a clearer and more positive policy framework. This would ensure that planning decisions are not impacted by blanket assessments taken at the high level plan making stage and rather any effects will be assessed on a case-by-case basis and informed by a site-specific and detailed Environmental Impact Assessment (EIA).

Whilst we acknowledge the Welsh Government's reasons for promoting the Priority Area approach to solar and wind, it will be important to ensure that the future low carbon system is not compromised by restricting developments with criteria that may be unduly onerous. In this context, we consider that there has to be flexibility within the energy system to allow for the introduction of balancing services<sup>3</sup>, the co-location of battery storage, solar and wind, and the ability to maximise the use of spare capacity. All of these require flexibility in the approach to grid connections whilst the electricity system of the future must be designed to facilitate the use of such smart flexibility options. In particular, an active Distribution System Operator (DSO) network will require connections across all voltage levels with no geographical restrictions to ensure the capacity of the network is both maximised and used efficiently. We welcome the acknowledgment of the need for taller turbines as this should help to future-proof the

final NDF, although we recommend the removal of any reference to specific heights of turbines, such as 250m to tip. Given the scale of the decarbonisation challenge and developments within the renewables sector, the NDF should contain a statement in support of any turbine height deemed to be appropriate to specific locations and capable of delivering positive results with regards to decarbonisation ambitions. This would best align with a criteria based approach and would be flexible to the demands of the industry.

We anticipate a significant programme of repowering of onshore wind sites over the coming years with the aim of incorporating the most efficient and cost-effective technologies into existing sites. Repowering will be required in order to maintain and increase the contribution of renewables to date and will ensure that the Welsh Government's ambitions regarding future renewables targets are not undermined<sup>4</sup>.

Policy makers should therefore seek to put in place supportive policies for repowering to ensure existing renewable deployment levels are maintained. In this context, it is important that the final NDF provides clarification that applications for repowering will be supported, given that the sites were previously determined to be suitable for windfarm development. Moreover, the removal of Priority Areas from the NDF would facilitate a positive approach towards repowering as it would help ensure existing sites do not fall within newly allocated Priority Areas containing additional constraints that may impact on the continued operation of these sites.

This repowering programme can run in conjunction with the development of new solar and battery storage sites, with co-location of these technologies being delivered where technically and economically feasible. The NDF should recognise the role of repowering and the emergence of innovative technologies such as battery storage and should be supportive of the increasing innovation within this sector. We consider that the draft NDF as it stands does not go far enough in its support of the full range of these kind of technologies, and does not place sufficient emphasis on the essential need for appropriate renewables infrastructure, including grid infrastructure.

As mentioned previously, the consideration of taller turbines is welcomed as this is consistent with current developments within the wind industry and cost-effectively optimising resources. However, we would recommend that any limitations on innovation and emerging renewable technologies should be resisted in order to future proof the final NDF up to 2040.

Support for renewable energy developments, such as onshore wind and solar is a key part of the decarbonisation agenda. However, strategic decisions on how heating is to be decarbonised (electrification vs repurposing the gas network using renewable gases and hydrogen) have yet to be made. These decisions will further impact in due course on the requirements for further deployment of renewable developments across Wales.

Although it is acknowledged that the Welsh National Marine Plan will be the document against which devolved offshore wind projects will be assessed, we consider that the draft NDF should recognise and support the potential future contribution which could be made by offshore wind (and indeed tidal technologies) in Welsh waters, and provide a supportive policy framework for the onshore elements of these offshore schemes.

We would also highlight that clarity and certainty is vital for developers to reduce risk and move forward with developments. Potential planning and financial issues need to be considered well in advance to ensure fully informed strategic decisions can be made. Moreover, given the 20 year time horizon underlying the NDF, the policy decisions taken by the Welsh Government now will have significant implications for years to come. It follows that the finalisation of the NDF is a key opportunity to provide support across all renewable technologies by amending the current approach and proposed policy wording in the way suggested above.

## 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.

Neither agree nor disagree

## 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?

Neither agree nor disagree

## 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?

Neither agree nor disagree

## 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?

Neither agree nor disagree

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?

While ScottishPower Renewables' activity in Wales is currently limited, it remains our policy to seek to provide bilingual services in consulting with members of the public and stakeholders on renewables developments and planning applications in Wales.

To that end we:

- ☐ Publish relevant written material (information sheets on our proposed projects, display boards for public exhibitions, summaries of Environmental Statements etc.) in Welsh and English;
- ☐ Include at least one Welsh language speaker in our teams for exhibitions publicising our projects;
- ☐ Include at least one Welsh language speaker in our teams at Community Liaison Panel meetings;
- ☐ Offer all stakeholders the ability to make and receive comments on our projects in Welsh and English.

Should any operational issues arise in relation to our existing projects in Wales, we will endeavour to engage with any Welsh speakers affected in Welsh.

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?

Full detailed SPR letter and response was submitted by email to [ndf@gov.wales](mailto:ndf@gov.wales)

### 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.

<b>Name</b>	Jamie Gilliland
<b>Organisation (if applicable)</b>	ScottishPower Renewables
<b>Preferred contact details (email/phone/post)</b>	SPRplanningpolicy@scottishpower.com

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

SPRplanningpolicy@scottishpower.com

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

*No Response*