

From: [Gwyn Hughes](#)
To: [NDE](#)
Subject: Ndf consultation
Date: 15 November 2019 07:09:51

I am writing to provide my feedback on the National Development Framework (NDF)

The NDF has a target of achieving 70% of electricity from renewables by 2030. However, as there is no estimate of electricity consumption in 2030 it is impossible to know how much energy this corresponds to, or what generating capacity is required.

The target needs further definition to make it actionable.

The NDF aims to produce all of this renewable energy from onshore wind and solar. My understanding of Planning Policy Wales is that the NDF has to take account of any current National Marine Plan (NMP), which, since November 12th, we now have.

The NMP supports offshore wind, tidal range, tidal stream and wave power, although no target for generation is given. Some, or all, of these are likely to contribute significantly to achieving the 70% target. Possibly so much so that land based generation isn't required.

The renewable energy elements in both the NDF and NMP need to be combined into a single renewables strategy with a timeline to achieve the target.

Buried in an appendix of one of your consultants' reports is a target figure of 9 TWh of power, although this is not quoted in the NDF. It also shows how the 15 Priority Areas can generate 95 TWh from 20% of Welsh land. Ambition is good, but I question whether we really need to generate ten times the energy we need, especially as this figure does not include marine energy from the NMP, or the NDF include any actions to drive up demand

The generation target needs to be set with a grounding in reality in order to be achievable.

I would urge you to consult again and consult widely. There is an enthusiasm for tackling the challenges of climate change and the people of Wales can help develop and deliver a realistic, achievable plan.

Many thanks for the opportunity to contribute,

Gwyn Hughes