

From: [Gray, Hannah \(Avison Young - UK\)](#)
To: [NDE](#)
Cc: [REDACTED]
Subject: Welsh NDF Consultation - Response on behalf of the Nuclear Decommissioning Authority
Date: 15 November 2019 15:36:31
Attachments: [image001.jpg](#)
[image002.jpg](#)
[Draft NDF Consultation Covering Letter on behalf of the NDA.pdf](#)
[Draft NDF Consultation Response Form on behalf of the NDA.pdf](#)

Dear Sir/Madam,
Please find attached representations to the Draft NDF Consultation on behalf of our client, the Nuclear Decommissioning Authority, comprising of Covering Letter and Completed Consultation Form.

If you require anything else then please get in touch.

Regards,

Hannah

Hannah Gray MRTPI

Senior Planner

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Your Ref: Draft NDF Consultation

14 November 2019

NDF Team - Planning Policy
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

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Dear Sir/Madam,

WELSH GOVERNMENT: DRAFT NATIONAL DEVELOPMENT FRAMEWORK CONSULTATION

Representation on behalf of the Nuclear Decommissioning Authority

We are writing to you on behalf of the Nuclear Decommissioning Authority ('the NDA') in respect of the current consultation on the *Draft National Development Framework*. Avison Young are the appointed property advisor for the NDA and provide planning advice across the NDA's UK-wide estate.

The NDA is the major landowner at the Wylfa and Trawsfynydd sites in North Wales. The representations made herein are made within the context of these two landholdings.

It should be noted that Avison Young (formerly GVA) previously made representations to the *Issues, Options and Preferred Options* stage on behalf of the NDA in July 2018. This further letter of representation should be read in conjunction with our previous letter of representation (appended with this Covering Letter for reference).

Trawsfynydd Site: Context

The total landholding at Trawsfynydd, Blaenau Ffestiniog, Gwynedd, LL41 4DT extends to 774 hectares, comprising the former power station site, Llyn Trawsfynydd and surrounding land. Trawsfynydd generated electricity from 1965 to 1991 and permanent shut down was announced in 1993. The site is currently being decommissioned, which involves the systematic removal and management of plant, buildings and waste previously associated with electricity generation.

The site is currently in the Care & Maintenance (C&M) Preparation phase, following which it will move into C&M, during which time the site and any remaining structures will be kept in a passively safe and secure state for a number of decades until final site clearance is undertaken.

The Trawsfynydd site forms part of the Snowdonia Enterprise Zone (SEZ) and has been identified by Parliament's Welsh Affairs Committee and other Welsh National bodies as a potential location for development of a Small Modular Reactor (SMR). The Welsh Government and SEZ Board have both engaged with the NDA, other stakeholders, potential investors and developers of SMR technologies over the Trawsfynydd site's potential.

In terms of timescales, it is expected that power generation could be achieved on the site by 2030. It is the intention of the SEZ Board to twin-track ongoing decommissioning and new development at the site.

The SEZ Board has undertaken initial study work confirming there is sufficient scope to accommodate new development onsite without impinging on decommissioning activity. Ongoing engagement with the NDA and Magnox (the site operator) will continue in order to achieve this, subject to future policy decisions made by the UK Government going forwards.

Wylfa Newydd Site: Context

The total landholding at Wylfa, Cemaes Bay, LL67 0DH extends to 115.9 hectares; largely comprising the former power station and land leased on a long-term basis to Horizon Nuclear Power, National Grid and SP Manweb. Wylfa Power Station generated electricity between 1971 and 2015. The site is in the defuelling phase, following which Care and Maintenance preparations will begin.

The Wylfa site lies in proximity to the designated Anglesey Enterprise Zone (AEZ), which reflects the development of the site as a new nuclear power station. Subject to the project re-starting, the facility will have an installed generation capacity of 3,100MW; create up to 8,500 jobs during the seven year construction phase, and 850 jobs during the 60 year operational phase.

Response to Draft NDF Consultation

The NDA strongly supports the widespread utilisation of low-carbon energy sources across the United Kingdom. As members of the Snowdonia Enterprise Zone Advisory Board, the NDA has and will continue to play a key role in engaging with the Welsh Government regarding the drafting and implementation of national energy policies.

The NDA is generally supportive of the Draft Welsh NDF Consultation documentation. Whilst the NDA is not responsible for delivering new build nuclear facilities, either small or large in-scale, it recognises the potential for low carbon energy generation in the area surrounding Wylfa Newydd and at the Trawsfynydd site, in line with UK and Welsh Government policy objectives and local stakeholder aspirations. The NDA, therefore, supports the text contained within Draft Policy 22 of the Draft NDF *North West Wales and Energy*, which the Snowdonia Enterprise Zone Advisory Board has identified as its top priority.

Summary and Next Steps

Please find enclosed a representation form for your consideration, although our response is made in relation to the NDA's sites alone and therefore we have only answered questions where it is within the interests of the NDA to do so.

In summary, the NDA is supportive of the text contained within the Draft NDF document. The NDA wishes to take this opportunity to reiterate that both the Trawsfynydd and Wylfa Newydd sites are appropriate for identification as national scale low-carbon energy generation and employment locations; in the case of Trawsfynydd, this is bolstered by the site's Enterprise Zone status.

If you require any further information in respect of the Trawsfynydd or Wylfa sites then please contact us using the contact information provided below.

Yours sincerely



Matt Verlander MRTPI
Director



matt.verlander@avisonyoung.com
For and on behalf of
GVA Grimley Limited t/a Avison Young

Enc.

Consultation Response Form

Your name	Matt Verlander
Your address	Avison Young, Central Square South, Orchard Street, Newcastle, NE3 1AZ
Preferred contact details (email/phone/post)	[REDACTED]
Organisation (if applicable)	Avison Young

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

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

The NDA does not wish to comment on this question.

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...

	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

The NDA does not wish to comment on this question.

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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

The NDA does not wish to comment on this question.

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

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

The NDA does not wish to comment on this question.

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?

A diagram of a 1D lattice with 7 sites. The first 5 sites are in a light blue region, and the last 2 sites are in a light gray region. Each site contains a small white square representing a particle.

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

The NDA does not wish to comment on this question.

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?

[illegible]

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

- 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?

8. The Regions (policy 16)

- [illegible]

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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.

The NDA does not wish to comment on this question.

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.

The *Integrated Sustainability Appraisal* (ISA) provided as part of the Draft NDF Consultation identifies positive effects in relation to Policy 22; largely attributed to the emphasis on renewable energy resources and generation of low-carbon energy within the text. The NDA are supportive of this conclusion.

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?

The NDA does not wish to comment on this question.

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?

The NDA does not wish to comment on this question.

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.

The NDA do not wish to comment on this question.

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?

The NDA is in general support of the Draft Welsh NDF Consultation documentation. In particular, the NDA supports the text contained within Draft Policy 22 of the Draft NDF North West Wales and Energy which refers to the use of small modular reactors (SMRs) in providing low carbon energy generation for the region surrounding Wylfa Newydd. Additionally, the NDA is supportive of the text referring to the potential of the Trawsfynydd site to accommodate an SMR.

The NDA is supportive of the text contained within the Draft NDF document. The NDA wishes to take this opportunity to reiterate that both the Trawsfynydd and Wylfa Newydd sites are appropriate for identification as national scale low-carbon energy generation and employment locations which, in the case of Trawsfynydd, is bolstered by the site's enterprise zone status.

16. Are you...?

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