

Dear

**ATISN 26515**

Thank you for your request which was received by the Welsh Government on the 18th December. You asked:

In relation to two maps, the first from the Draft National Development Framework consultation and the second from Future Wales 2040, why the areas numbered 1 and 8 do not appear on the second [map], and area 6 is significantly reduced in size.

Please provide government notes, minutes and/or briefing documents that explain why these areas were changed and any correspondence from the MOD or DIO about these areas.

**Our response**

Our response to the information you requested is as follows: -

**Background**

The identification of Priority Areas in the draft National Development Framework was informed by research carried out by Ove Arup and Partners Ltd. Arup produced a two-part report (Stage 1 and Stage 2) entitled - '[Assessment of onshore wind and solar energy potential in Wales](#)' – which was published on the Welsh Government website in August 2019. The report identified preferred areas for the development of both large-scale wind farms and solar farms across Wales. The methodology and criteria used by Arup to identify Priority Areas is set out in their report. The purpose of the ARUP report is also summarised in the Welsh Government's response to a previous FOI request, [ATISN 24789](#).

Stage 2, Table 5 of Arup's report, sets out the rationale for the refinement of Priority Areas for wind and solar energy (at that time). Together with the maps set out in the Appendix to the Stage 2 report, particularly Appendix J: Revised Priority Areas for Solar and Wind Energy, this information informed the preparation of the initial Priority Area map included in the draft National Development Framework. The draft National Development Framework 2020-2040 was published for consultation in August 2019 and included a Priority Area map showing 15 combined wind and solar areas and solar only areas

During the preparation of the draft National Development Framework and the final iteration Future Wales, various changes were made to the proposed Priority Areas (later known as Pre-Assessed Areas). These changes were based on consultation and engagement with key stakeholders and members of the public. Links to the National Development Framework consultation documents are referenced below.

**Removal of Priority Areas 1 and 8 from the draft National Development Framework and changes to Priority Area 6.**

Removal of Priority Areas 1 and 8 from the draft National Development Framework (prior to publication of Future Wales) was the result of consultation and discussion with the Ministry

of Defence (MOD). The MOD has operational areas across Wales, and the Welsh Government took the decision to remove or amend Priority Areas where the MOD were concerned about potential impacts on their activities.

On the [draft National Development Framework consultation page](#) under Responses: 'Public Bodies', you can view the response letter from the MOD in which they raise concerns about the Framework's renewable energy policy in the context of MOD operational areas.

Following the consultation process Welsh Government met with the MOD for more detailed talks and the minutes of that meeting (dated 30<sup>th</sup> January 2020), are attached for your information at Appendix 1 of this letter. These minutes were previously released as part of the FOI request [ATISN 15548](#). The minutes set out the operational areas of concern identified by the MOD which then informed a number of changes to the Priority Areas including the removal of areas 1 and 8. Priority Area 6 was also amended due to an MOD low fly zone.

In September 2020 the Welsh Government published the draft NDF [Consultation Report](#) which states (in section 4.6.37) that "the MOD have raised concerns regarding the protection of their estate and strategic training areas. The areas have therefore been refined, in consultation with the MOD, to address these concerns. A revised map will be published in the NDF [Future Wales]". The draft NDF Consultation Report also includes summaries of comments made by various stakeholders concerning Priority Areas generally, and in relation to specific locations.

### **Final Pre-Assessed Area boundary changes**

The final Pre-Assessed Area's as set out in Future Wales are for wind only and omit solar. Prior to the final Pre-Assessed Areas (PAAs) the original 15 Priority Areas (PAs) were amended as follows:

#### Priority Areas

PA 1: Deleted in its entirety due to MOD constraints.

PA 2: Deleted as it is a solar-only area.

PA 3: Solar area deleted.

PA 4: Deleted as it is a solar-only area.

PA 5: Affected by low flying zone.

PA 6: Affected by low flying zone.

PA 7: Not affected.

PA 8: Deleted in its entirety due to MOD constraints.

PA 9: Affected by low flying zone.

PA 10: Solar area deleted, and western boundary amended to exclude MOD constraint.

PA 11: Western boundary amended to take into account bat migration route.

PA 12: Deleted as it is a solar-only area.

PA 13: Deleted as it is a solar-only area.

PA 14: Solar area deleted, and new southern boundary amended by MOD constraint.

PA 15: Solar area deleted.

Following the amendments described above, the areas were renumbered and renamed as follows:

PA 3 became Pre-Assessed Area (PAA) 1.

PA 15 became PAA 2.

PA 5 became PAA 3.

PA 6 became PAA 4.  
PA 7 became PAA 5.  
PA 9 became PAA 6.  
PA 10 became PAA 7.  
PA 11 became PAA 8.  
PA 14 became PAA 9 and 10.

## **Integrated Sustainability Appraisal and Habitats Regulations Appraisal**

All Future Wales policies, including renewable energy policies 17 and 18, were subject to [Integrated Sustainability Appraisal](#) (ISA) (Arcadis, January 2021) and [Habitats Regulations Appraisal](#) (HRA) (Arcadis, February 2021). Both the ISA and HRA can be searched for the terms Priority Areas and Pre-Assessed Areas. Both reports were subject to public consultation. The HRA identifies changes made to Priority Areas resulting from environmental protection considerations, as opposed to MOD restrictions which were applied separately.

## **Further Resources**

Links supporting the preparation of NDF and Future Wales

- [Future Wales: the national plan 2040](#)

NDF/Future Wales Consultation - 2017 and 2019:

- [National Development Framework for Wales | GOV.WALES](#) (2017)
- [Draft National Development Framework | GOV.WALES](#) (2019)

## **Next steps**

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at: Information Rights Unit, Welsh Government, Cathays Park, Cardiff, CF10 3NQ or Email: [Freedomofinformation@gov.wales](mailto:Freedomofinformation@gov.wales)

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office,  
Wycliffe House,  
Water Lane,  
Wilmslow,  
Cheshire,  
SK9 5AF

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely

## Appendix 1

### Meeting between Welsh Government Planning Directorate and Ministry of Defence Finance and Military Capability – Infrastructure – National Development Framework Renewable Energy Policies

Thursday 30<sup>th</sup> January 2020 – 2pm

Teleconference

Notes

#### 1. Welcome and Introductions

|                |                     |
|----------------|---------------------|
| Jonathan Fudge | Welsh Government    |
| Stuart Ingram  | Welsh Government    |
| Max Hampton    | Welsh Government    |
| Jon Wilson     | Ministry of Defence |
| Julia Powell   | Ministry of Defence |
| Matthew Ellis  | Ministry of Defence |
| Clive Thomas   | Ministry of Defence |

#### 2. Progress on National Development Framework to date

JF updated the meeting on the role and purpose of the NDF. It will be an all-Wales strategic plan. Development plan status. Top of the hierarchy with SDPs and LDPs underneath. Lower tier plans will need to be conformity with NDF 20-year plan. Will be reviewed every 5 years.

Current draft we consulted on last summer reflect the priorities of the current Government plus set in the context of the Wellbeing of Future Generations Act. A sister document to Planning Policy Wales.

Issue of decarbonisation and renewable energy generation a core issue for the NDF. Climate change emergency declared by WG. All parts of WG are expected to demonstrate how they are contributing to this.

Now considering responses to the draft NDF consultation. By March policies will be amended and submitted to Minister for approval. Then submitted to National Assembly for Wales for scrutiny. 60 days of scrutiny. Final document published September / October this year.

JP questioned NDF as a whole and the MOD assets and their importance to Wales. JF stated that reference to the importance of military assets would be included in the NDF and draft text would be circulated for review.

#### 3. Update on Renewable Energy policies and evidence base

SI explained that the renewable energy policies in the NDF were developed as a replacement to the existing Strategic Search Areas (SSAs) in TAN8.

Arup had been commissioned to undertake a mapping exercise to calculate suitable areas for large scale wind and solar developments across Wales. This was a two-

stage exercise whereby constraints were mapped and then refined with specific reference to landscape sensitivity.

The draft NDF contained policies on renewable energy. National Parks and AONBs were excluded from development. The identified 'Priority Areas' had an in-built acceptance of landscape change and less constraints. The rest of Wales was open to applications but had no in-built acceptance of change.

Following on from the MODs response to the draft NDF, WG wished to discuss the status of the different MOD assets in Wales and their impact on the Priority Area boundaries.

#### **4. Discussion regarding MOD sites and status of NDF Priority Areas / Pre Assessed Areas**

##### **Aberporth**

Aberporth has statutory safeguarding zones. No development should impede radar operations at specific heights. In addition, developments should not interfere with the effectiveness of systems. Proposals would need to be micro sited accordingly. There should not be an indication that these areas have less constraint in others. To have them in the NDF would potentially be misleading to the industry.

##### **Sennybridge**

2nd most important training area across the UK. Lots of activity going on Working with Powys CC who are looking at a potential 10km zone around the area in local policy.

It is critical that the presence of this unique Defence asset within this Priority Area is taken into account. Detailed concerns have been expressed by the day-to-day military users of the Epynt / Sennybridge training area regarding the proposal for a presumption in favour of development for wind and solar in an area which is critical to training military personnel and as such maintaining the United Kingdom's overall defence capability.

##### **Cawdor Barracks**

Small site which houses a secondary radar / beacon. Scheduled to close in 2027. Within zone 12. Height restrictions will mean that developers may avoid.

##### **Pembrey Sands RAF**

Weapons range - outside of a wind priority area. Similar situation to Sennybridge in that developments should not impede the operations of the site.

##### **St Athan - Vale of Glamorgan**

Safeguarding map. Similar to Cawdor Barracks status. Small safeguarding area once MOD transfer complete with retention of a small directional beacon for aircraft.

##### **RAF Valley - Anglesey**

##### **RAF Mona - Anglesey**

15km protected boundary around the airfields. Rarely get developers trying to build schemes near to the airfields due to operational restrictions. RAF Valley also has a

radar with additional safeguards. Development in the vicinity would be of a major concern. Secondary radar at RAF Mona. Need to keep out of a 10km vicinity of the radar due to interference.

When you add them all together it would be difficult for a developer to operate a scheme in these areas.

### **Low Flying Tactical Training Area**

TTA is elongated for low flying. Inter-terrain flying. Limited flying time space even though area is extensive. Development around the edges would not be too much of an issue, but the cumulative impact of developments could severely restrict the use of the area for military use. Only 1 of 3 areas in the UK.

Very concerned that this is a very important resource and a major concern if they were to remain.

JF suggested a possible policy wording to identify this constraint to alleviate damage. These will be circulated for review.

## **5. Next Steps**

JF said we would go away and look at sites based on MOD comments. We will overlay the other constraints and look at what other spatial / policy changes need to be made. WG will share the emerging policy with MOD colleagues in due course.

## **6. AOB**

It was requested that any future queries relating to MODs assets be directed to Jon Wilson and that queries relating to changes in the NDF general policy statements be directed to Julia Powell.