

## **Consultation Response Form**

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Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	Cenin Renewables Limited

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

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

1.1 Cenin Renewables Limited (Cenin) does not disagree with the outcomes within the Draft National Development Framework (NDF) and recognises that the document has a number of implications both nationally and regionally. Cenin also recognise the challenge for Welsh Government (WG) of developing a National Development Framework that can accommodate and react to both economic and political unpredictability.

1.2 On the basis the outcomes should have a more practical emphasis, it is identified that a spatial dimension could be introduced in order to differentiate the draft NDF from Planning Policy Wales and other plans and programmes. Furthermore, the draft NDF should include a stronger commitment to economic development. The draft NDF has little or no reference to its context, relationship and opportunities beyond Welsh borders. These relationships are critical in terms of the general sustainability of the Wales economy and environment.

1.3 There is a general absence of reference to potential infrastructure opportunities within Wales within the Outcomes for the intended period of the Framework.

1.4 The commitment to addressing climate change is welcomed, however the NDF does not provide a robust enough roadmap to trying to address the issues that might arise as a direct or indirect result of climate change: there is a need to consider the implementations of the change in its broadest sense through the delivery of more effective infrastructure, coordinated approach on

the renewable energy provision, and joined up thinking on growth. Effective delivery of these elements must be viewed not as detrimental or accentuating climate change but in assisting and future proofing Wales and understanding any changes in the way that the population functions.

- 1.5 Specifically, Cenin supports the inclusion of Outcome 11 within the draft NDF which recognises “challenges of climate change demand urgent action on carbon emissions and the planning system must help Wales lead the way in promoting and delivering a competitive, sustainable decarbonised society” and that “decarbonisation and renewable energy commitments and targets will be treated as opportunities to build a more resilient and equitable low-carbon economy, develop clean and efficient transport infrastructure, improve public health and generate skilled jobs in new sectors”.

## 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...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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:

- 2.1 The draft NDF directs significant new development to key locations – an approach that generally reflects how planning for growth has been carried out in Wales. However, the number of locations is limited and the explanations of what is meant and how it be applied is brief.

### 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?

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 checked="" type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

3.1 No Comments.

### 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 checked="" 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?

4.1 The identification of mobile action zones is welcomed. It is import that the policy takes into account the interaction between telecommunications and infrastructure requirements.

### 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?

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"/>

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

5.1 Policy 7 sets out the strategic direction for electric vehicle (EV) charging infrastructure. Fundamental to the delivery of any effective energy network to include (EV) charging infrastructure is the grid infrastructure and grid capacity. This infrastructure requires significant upgrade throughout the country if Wales is to achieve its stated outcome of leading the way in a sustainable, competitive and decarbonised society.

5.2 Grid infrastructure is relevant not only in respect of the generation of energy on a macro scale, but also to achieve localised distribution to the decarbonised transport and housing developments that will be sought to be achieved over the 20 year period of the draft NDF.

5.3 Policy 7 should support the principle of new or upgraded grid infrastructure to enable the delivery of the required EV charging infrastructure.

## 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?

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

6.1 No information is provided or spatial diagram or plan as to the proposed location or extent of the proposed strategic framework for biodiversity enhancement and ecosystem resilience (Policy 8) or the National Forest (Policy 9).

6.2 Policies 8 and 9 should recognise the potential interaction between the development framework for infrastructure (policies 10 to 13).

## 7. Renewable Energy and District Heat Networks (policies 10-15)

- 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	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 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?

### Spatial strategy: Powering and heating places with renewable energy and District Heat Networks

7.1 Cenin Renewables Limited (Cenin) specialises in developing Embedded generation and owns and operates a portfolio of renewable developments in Wales and has a strategy of developing integrated generation sites which include as wind, photovoltaic (PV) anaerobic digestion and Batteries.

7.2 The draft NDF is a generation defining opportunity to execute a new planning framework that could enable Wales' potential to combat the challenges of the declared Climate Emergency. New opportunities for renewable energy generation and greater use of renewable energy sources, both at scale and community energy schemes, are central to Wales' decarbonisation aims and ambitions for prosperity and wellbeing. The focus on decarbonisation as a key spatial issue and policy driver is crucial to provide a platform for a positive policy framework to increase investment in new renewable energy development in Wales. A well-designed positive planning policy framework has much potential to attract investment in new development required to assist in meeting decarbonisation targets, and targets relating to renewable energy. It is therefore, essential that opportunities to develop renewables in Wales are not unnecessarily constrained.

7.3 Cenin welcome WG commitment and positive approach to renewables. The sentiment of target setting by Welsh Government is generally supported

although there is limited information in terms of practical delivery of WG targets. Furthermore, there appears to be limited tie in with other WG strategies or plans, or with proposals and policies whether from the public or private sectors.

7.4 The draft NDF needs to be clear that there is an established, and urgent, need in Wales for a significant increase in development of low carbon energy generation projects and associated infrastructure (such as overhead lines and substations) to meet decarbonisation targets and prosperity goals, and that there should be a requirement for substantial weight to be attributed by decision-makers to the contribution of projects towards meet this need. This would make a significant contribution to the generational change in energy supply that is required over the duration of the draft NDF. The draft NDF should therefore be unequivocal in its support for new renewable energy developments and associated infrastructure.

7.5 It is welcomed that WG will use its policy levers to assist in the delivery of renewable energy projects. Fundamental to the delivery of any effective energy network is Grid infrastructure and therefore the reference to building a case for a new reinforced grid infrastructure (page 36) is important. The draft NDF would benefit from a specific policy relating to Grid infrastructure and Grid connections to recognise the relationship of energy generation and distribution.

#### Policy 10 – Wind and Solar Energy in Priority Areas and Policy 11 – Wind and Solar Energy Outside of Priority Areas

7.6 The draft NDF is considered to be positive progression from the previous TAN8 framework for consenting. Specifically, Cenin welcomes to opportunity for consideration of developments for renewables outside of National Parks and Areas of Outstanding Natural Beauty (AONBs).

7.7 A positive policy framework within the draft NDF with a 'presumption-in-favour' policy, reduces consenting risk for renewable energy developments of national significance and associated infrastructure.

7.8 There are however, concerns that the Arup assessment which has informed the draft NDF has misdirected the identification of the Priority Areas for wind and solar (Policy 10). It would be prudent to recognise that renewables developers are best placed to identify sites for renewables developments in line with a criteria based policy and assessment of potential significant effects through environmental impact assessments. The Arup assessment applies constraints that are overly onerous in some cases and have excluded for example, constraints with regard to residential properties and noise.

7.9 There also appears to be ambiguity in terms of why certain areas have been included within the priority areas for solar only and those areas that have been allocated for both wind and solar. The Arup assessment does not recognise that the approach to development of wind and solar sites and the constraints applied to assess these developments are very different. There is

limited clarity as to how a proposed project for wind or solar that may be in 'competition' with one another would be considered and prioritised in an area that has been identified suitable for both wind and solar under the currently policy framework.

7.10 The priority areas within the draft NDF at present exclude potential renewables developments within the Cenin development portfolio that have a Grid connection agreement, are commercially viable and would offer considerable benefit to the local area. The methodology of designation areas as Amber and Green should be revised and merged into one.

7.11 The omission of substantive reference within the draft NDF to the grid issues is an oversight to the document, and one for which there must be a commitment through a national planning framework in order for the realisation of schemes of renewable and low-carbon schemes throughout Wales.

7.12 Specifically, when identifying the Priority areas the Arup's assessment does not recognise the benefits of brining a grid network into an area of unconstrained renewables recourse. It fails to recognise that Grid capacity is a key constraint to developing renewables developments rather than proximity to grid infrastructure.

7.13 Developments of national significance require a different approach to that of local scale development (as a result of the complexity, risk and cost involved for developers) which is recognised in relation to the Developments of National Significance consenting process.

7.14 Cenin consider that a criteria based approach to policy would help recognise Wales' ambitions to deliver on the targets for generation of renewable energy in lieu of a spatial priority areas. Furthermore, a criteria based approach is more responsive to continuing technological advancements, avoiding unnecessary constraints and limits on developments.

7.15 Should the spatial approach and priority areas be adopted as part of the NDF, clarity is sought with regard to the location of the priority areas. See appendix 1.

#### Policy 12 – Wind and Solar Energy in National Parks and Areas of Outstanding Natural Beauty

7.16 No Comment.

#### Policy 13 – Other Renewable Energy Developments

7.17 Cenin welcome the recognition by WG that renewable energy technologies other than wind and solar are supported in principle.

7.18 The NDF does not consider the interaction of land to tidal or offshore renewable energy generation.

- 7.19 There appears to be a heavily weighted presumption in favour of local-owned generation schemes although there is very little commentary in terms of what locally owned looks like in practice.

## 8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

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 checked="" type="checkbox"/>

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

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"/>

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.

11.1	No comment.
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## 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.

12.1	No comment.
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## 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?

13.1	No comment.
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#### 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 favorably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

14.1	No comment.
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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 favorably 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 favorably than the English language.

14.2	No comment.
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#### 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?

<p>The comments within this consultation response form represent Cenin Renewables Limited views on the draft NDF. Should further clarification be required Cenin would be pleased to provide additional information.</p>
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<p><u>Renewable Energy Development and Infrastructure Specific Comments:</u></p>
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| <p>15.1 The draft NDF should be to provide the policy framework and spatial guidance to facilitate nationally significant renewable energy development and associated infrastructure. To avoid a backward step in policy support, an equivalent robust supporting policy framework is required in Wales to facilitate investment in infrastructure and renewable energy development of national significance.</p> <p>15.2 There is an absence of reference within the draft NDF to the processes associated with Nationally Significant Infrastructure Projects (secured through the DCO process), to Developments of National Significance or to the Wales</p> |
|---|

Infrastructure Commission. In order for the NDF to be beneficial in respect of infrastructure, the context of these procedures need to be explained and put into context with the Wales Infrastructure Investment Plan (WIIP).

- 15.3 If it is the case that there is a stronger connection to and influence of the WIIP then that document will need swift review unless the draft NDF is to simply follow what is included within it already, which has a 2012 base date. This is not considered to be robust enough to form the basis of development until 2040.
- 15.4 Renewable energy projects of ‘nationally significant’ scale in Wales have previously benefited from the policy support of the UK National Policy Statements (NPS EN1, EN3 and EN5). The NPS’ recognise the “ the need and urgency for new energy infrastructure to be consented and built with the objective of contributing to a secure, diverse and affordable energy supply and supporting the Government’s policies on sustainable development, in particular by mitigating and adapting to climate change ” and set a starting point of a “presumption in favour of granting consent” .
- 15.5 This policy support has been instrumental to reducing the consenting stage risk associated with developing renewable energy projects and associated infrastructure. These policies also set clear frameworks for consideration of impacts and decision-making, which facilitated the process.
- 15.6 Therefore the most preferable approach would be to have a criteria based policy in lieu of a spatial approach which excluded development of renewables projects within the National Parks and Areas of Outstanding Natural Beauty. To reiterate the points made above, It would be disappointing if the draft document were to preclude or discourage developments that could assist in meeting Wales renewables targets.
- 15.7 Prior to adoption of the draft NDF it would be prudent to develop a working group with industry to assist in developing an appropriate policy framework that does not unnecessarily restrict development and thus economic investment and investment into the community.

**16. Are you...?**

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

<b>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</b>	<input type="checkbox"/>
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**MANMOEL COMMON**  
**Proposed additional land area to be included within priority area for renewables**

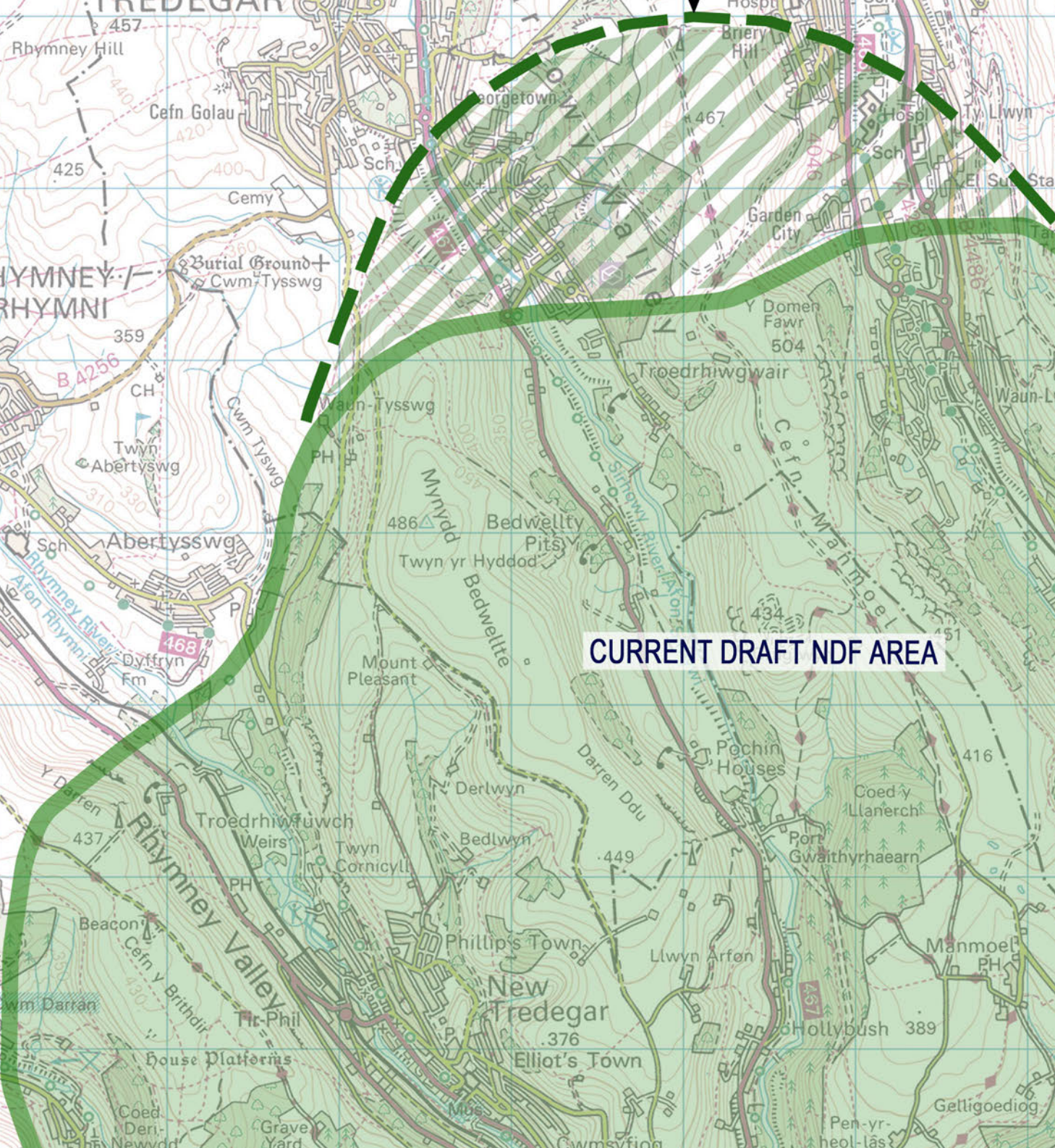


Drwg: MAN1911-1

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**Proposed additional land area to be included within priority area for renewables**



**CURRENT DRAFT NDF AREA**