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EDF Energy's response to the Welsh Government's draft National Development Framework

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, storage and energy supply to end users. We have around five million electricity and gas customer accounts in the UK, including residential and business users.

EDF Energy welcomes the Welsh Government's plans to bring regulations to the Assembly to meet the Committee on Climate Change's recommendation of a 95% greenhouse gas emissions reduction target by 2050¹. EDF Energy believes that the development of renewable energy in Wales will play a vital role in delivering this target. The National Development Framework provides the Government with a valuable opportunity to remove barriers to the growth of the renewable energy sector in Wales, while ensuring that environmental and social requirements are met.

Given the significant amount of renewable generation capacity that will be required to meet the Government's challenging targets, this opportunity should be capitalised upon to support development of productive and sustainable renewable energy projects as far as possible. We are concerned that the designation of 'Priority Areas' for onshore wind development will be unnecessarily restrictive. Instead of using a high level assessment to identify areas presumed to be 'best' for renewable developments, we believe that the Government should allow developers to propose sites that they believe to be appropriate for development, taking account of all relevant factors. Developers will have the resources and knowledge to assess these sites in detail.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact Guy Buckenham on 07875 112585, or me.

I confirm that this letter and its attachment may be published on the Welsh Government's website.

Yours sincerely,

A black rectangular box redacting the signature of Angela Hepworth.

Angela Hepworth
Corporate Policy and Regulation Director

¹ Welsh Government, 11th June 2019, *Wales accepts Committee on Climate Change 95% emissions reduction target*, available at gov.wales/wales-accepts-committee-climate-change-95-emissions-reduction-target (accessed 18/10/2019)

Attachment

The Welsh Government's draft National Development Framework

EDF Energy's responses to your questions

Q1. Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

EDF Energy is principally concerned with Outcome 11. We believe that developing a place for people to live in which is decarbonised is a challenging but achievable outcome. However, delivery of Outcome 11 will be dependent on an effective and fit for purpose planning system.

The NDF will be a key reference for achieving this outcome, as it is the primary development plan for Developments of National Significance (DNS) applications. This means that decisions on energy projects >10MW (and below 350MW for energy generation other than onshore wind) must be taken in accordance with the NDF. The NDF also provides direction for Strategic Development Plans (SDPs) and Local Development Plans (LDPs) prepared by local planning authorities (LPAs), who determine proposed energy developments of 10MW or less.

We believe that it is important that the NDF is a robust document with enduring directions to deliver policy stability. It is important that the Government ensures that the set of outcomes in the NDF are mutually consistent, so that the delivery of one outcome does not compromise the delivery of another outcome.

Q2. To what extent do you agree or disagree with the spatial strategy and key principles for development in: **a. Urban areas?** **b. Rural areas?**

EDF Energy has no comment to make in response to this question.

Q3. To what extent do you agree or disagree with the approach to increasing affordable housing?

EDF Energy has no comment to make in response to this question.

Q4. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

EDF Energy has no comment to make in response to this question.

Q5. 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?

EDF Energy has no comment to make in response to this question.

Q6. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

EDF Energy welcomes proposals to embed green infrastructure in projects, but believes that more details are needed on how and where these green infrastructure projects are expected to be

delivered. While there are area-based designations for onshore wind and solar developments, plans for green infrastructure projects are less clear. We would welcome the opportunity to see if there are lessons to be learned for the development of either category of infrastructure.

Q7. To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using:
a. Large scale wind and solar developments?
b. District heat networks?

EDF Energy supports in principle the Government's positive approach to renewables and the efforts made to reflect this in the narrative and policies of the NDF. We also welcome the consideration of turbines up to 250m tip height, which should help to future-proof the NDF. We firmly believe that the Welsh Government can be an enabler, welcoming the work of companies that want to invest in renewable energy generation in Wales, within the wider context of the climate emergency, supporting economic growth, delivering security of supply and lowering consumer bills.

However, we have some concerns related to the Arup Assessment and output in the form of the designation of 'Priority Areas' for wind and solar energy. We find these 'Priority Areas' to be largely unsuitable for onshore wind once standard developer constraints (such as property buffers and wind speeds) are applied. Initial analysis shows that approximately only 10% of the total area of the 'Priority Areas' is potentially suitable for onshore wind. However, once existing operational schemes within 'Priority Areas' have been accounted for, this proportion will be even lower. Furthermore, some of these sub-optimal locations would only be capable of hosting small schemes (<10MW) which are below the threshold of projects that would be determined against the NDF. There is a risk that this proposed approach of Priority Areas could obstruct (rather than promote) onshore wind development. This in turn could compromise the Welsh Government's ability to meet its renewable energy targets.

An assessment of future potential for onshore wind in Wales, based on standard constraints applied by developers, indicates that a significant proportion of the pipeline falls outside of the Priority Areas in the category of "Other Areas" (that is, outside the Priority Areas but not in National Parks and Areas of Outstanding Natural Beauty). This is because the Priority Areas exclude some of the least-constrained areas that are furthest away from residential properties. As Policy 11 appears to set a higher threshold of acceptability for developments outside the Priority Areas, the consenting risk for these developments could be higher.

Many of the best potential onshore wind sites in Wales (which include several sites previously within Technical Advice Note (TAN) 8 Strategic Search Areas (SSAs) and sites on the Welsh Minister's forestry estates) are outside the Priority Areas but have a high likelihood of deliverability. Sites on the forestry estates could provide revenue streams to the Welsh Government. Many of the TAN8 SSAs have already been subject to considerable development activity and investment, but there is still potential for further sustainable development of onshore wind.

Overall, the additional consenting risk outside Priority Areas may have a negative impact on future inward investment in onshore wind development in Wales and support for the established Welsh supply chain will be reduced or lost entirely.

Our preference would be for Priority Areas to be replaced by a criteria-based approach which incorporates the supportive wording in Policy 10, avoids subjective constraints (such as landscape and visual impact), and avoids overly onerous buffers on designated features (heritage, ecology etc.).

Furthermore, it is not possible to merge onshore wind and solar development potential into a single 'area' (as the Arup assessment has done) because different constraints are applied to each of these technologies. As well as applying constraints only relevant to solar and that should not apply to onshore wind, the Arup assessment has also applied a high-level landscape and visual inter-visibility assessment which is not appropriate at the plan-making stage.

Use of a criteria-based approach would ensure that individual planning decisions are not prejudged by relatively unsophisticated and potentially subjective high-level assessments taken at the plan-making stage. The appropriate opportunity for Welsh Ministers to assess effects will be on a case-by-case basis at the point of making a decision on the DNS application, which will be accompanied by a site-specific and detailed Environmental Impact Assessment (EIA).

Large-scale onshore wind developments may require associated development at a level beyond that over which the Welsh Government has jurisdiction (i.e. Nationally Significant Infrastructure Projects (NSIPs) over >132kV determined at the UK Government level). The NDF should provide 'in principle' support for these projects.

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?

Although the Welsh National Marine Plan will be the document against which devolved offshore projects are assessed, the NDF should nonetheless recognise and support the contribution to tackling climate change made by offshore wind, and provide a supportive policy framework for the devolved onshore elements of these offshore schemes.

We believe that the NDF is inconsistent in its approach to DNS projects. It has gone to an unnecessary level of detail to identify Priority Areas for onshore wind and solar whilst making little or no reference to other types of DNS projects (e.g. ports, harbours, transport).

Q8. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

EDF Energy supports planning policy consistency across all regions of Wales. We believe that there may be valuable opportunities for energy infrastructure in all of the regions and, as proposed in our preferred criteria-based approach, these should be determined on a case-by-case basis.

Q9. To what extent do you agree or disagree with the proposed policies and approach for the North Region?

EDF Energy welcomes the Welsh Government's support in Policy 22 for the North West Nuclear Arc initiative. We agree with the statement in Policy 22 that "The potential Wylfa Newydd nuclear power station development could provide significant employment, training and other associated economic benefits across the whole region if a decision is made to proceed with the scheme".

Q10. To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

EDF Energy has no comment to make in response to this question.

Q11. To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

EDF Energy has no comment to make in response to this question.

Q12. 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.

EDF Energy has no comment to make in response to this question.

Q13. Do you have any comments on the Habitats Regulations Assessment report?

EDF Energy has no comment to make in response to this question.

Q14. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

EDF Energy has no comment to make in response to this question.

Q15. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

EDF Energy has no comment to make in response to this question.

**EDF Energy
November 2019**