

Consultation Response Form

Your name	Dafydd Williams, Head of Project Development
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Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	Eco2 on behalf of wind energy collaboration on Welsh development sites with Statkraft

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 checked="" 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:

Outcome 11 references 'places (where people live) which are decarbonised' but this is misrepresentation. Decarbonisation should not be limited to places of habitation but to all regions of Wales which will have a role in addressing global heating. Decarbonisation will come through, for example, utilisation of non-inhabited areas for renewable energy and energy storage. We advise that revisions are made that explain the contribution that all regions, regardless of places in which people live, need to make to the decarbonisation agenda and efforts to halt global heating.

Outcome 11 conveys an absence of any focused outcomes on global heating and the climate crisis, inclusive of which should be the prioritised actions that are necessary to address one of the principal existential threats to humanity, species and the planet. We believe that the critical nature of this threat is such that merely addressing decarbonisation as the final outcomes deregulates the urgency for action on this particular topic and only meets part of the critical requirements to address global heating (other aspects include decarbonising heat and transport, reducing energy demand and consumption, reconsideration of current growth paradigms).

The Foreword of the draft NDF refers to tackling climate change as “*the globally defining challenge of our time and it is why we have declared a climate emergency*”. It adds that “*tackling the causes and mitigating the effects of climate change is a key consideration in our plans and hopes for Wales*”. Not only does the last outcome, No.11, not make reference to focused outcomes, but its ambitions contrast with the very restrictive spatial planning approach that is taken in relation to onshore wind deployment. Consideration should be given to making this the first outcome, demonstrating the priority to be given to this defining challenge.

The wider public policy position on the crisis of global heating needs to be fully acknowledged up front, with contextual reference made to key policy drivers, namely:

The Committee on Climate Change (CCC) published its landmark report entitled ‘Net Zero – UK’s Contribution to Stopping Global Warming’ in May 2019. The report responds to requests from the Governments of the UK, Wales and Scotland, asking the CCC to reassess the UK’s long-term carbon emissions targets.

The Foreword of the report (page 8) sets out that the CCC has “*reviewed the latest scientific evidence on climate change, including last year’s IPCC special report on global warming of 1.5°C and considered the appropriate role of the UK in the global challenge to limit future temperature increases*”. It adds, “*Net Zero is a more fundamental aim than previous targets. By reducing emissions produced in the UK to zero, we also end our contribution to rising global temperatures*”.

The Foreword also sets out that “*we must now increase our ambition to tackle climate change. The science demands it; the evidence is before you; we must start at once; there is no time to lose*”.

The report makes recommendations for the UK economy including:

- UK overall: a new tougher emissions target of net zero¹ greenhouse gases (GHG) by 2050, ending the UK’s contribution to global warming within 30 years. This would replace the previous target of an 80% reduction by 2050 from a 1990 baseline;
- Wales: a 95% reduction in GHG by 2050, reflecting Wales’ greater agricultural emissions;
- A net zero GHG target for 2050 would deliver on the commitment that the UK made by signing the Paris Agreement.

The report makes it clear that, “*this is only possible if clear, stable and well designed policies to reduce emissions further are introduced across the economy without delay. Current policy is insufficient for even the existing targets*”.

¹ A net zero target would require 100% reduction in greenhouse gas emissions. It is referred to as ‘net’ as the expectation is that it would be met with some remaining sources of emissions which would need to be offset by removals of CO₂ from the atmosphere.

The CCC also published a 'Progress Report to Parliament' in July 2019. The Foreword of the Report states that in May 2019 the CCC's Net Zero report offered compelling analysis of the need to reduce greenhouse gas emissions in the UK effectively to zero by 2050.

The Report states that the CCC strongly welcomes the UK Parliament's decision to make net zero law – and the corresponding decisions of the National Assembly for Wales and the Scottish Parliament. These are acknowledged to be positive steps which are of *“fundamental consequence for the future path of our economy, our society and the climate. Carbon neutrality has now become a mainstream goal”*.

The report added that *“we find a substantial gap between current plans and future requirements and an even greater shortfall in action”*. The NDF needs to ensure that it seeks to positively address that “substantial gap”.

The outcomes in the NDF must address this key target set for Wales and the UK which is extremely challenging. Planning is a key tool with regard to necessary land use action and the current proposed NDF for onshore renewables is, as noted, a restrictive and insufficient policy response. Positive recommendations are set out below however, as to how the proposed spatial approach as currently proposed in the draft NDF could be amended.

The CCC report sets out various scenarios for UK net zero GHGs in 2050. These include one of extensive electrification, particularly of transport and heating. Page 23 of the Executive Summary states that this would need to be *“supported by major expansion of renewable and other low carbon power generation. The scenarios involve around a doubling of electricity demand, with all power produced from low carbon sources (compared to 50% today).”* (underlining added)

It also adds (Executive Summary page 34) that in terms of preparation with regard to decarbonised power, *“the supply of low carbon power must continue to expand rapidly”*.

The scale of the challenge presented by the new targets adopted by the UK Government on the advice of the CCC is very considerable, especially given the requirements for decarbonisation of heat and transport – this will require very substantial increases in renewable generation to meet our near zero commitments.

It is very clear that the public mood has changed in 2019 with regard to the importance of tackling the climate crisis. As noted, the NDF rightly references “this defining challenge of our time” at the outset of the document – but it is essential that the policy direction that follows lines up to that ‘billion’.

Timing is critical as with each passing year, and the closer we are to the target dates, the more time is lost in implementing the necessary renewable infrastructure and generating capacity. Onshore wind remains the lowest cost technology deployable at scale – the opportunity presented by this technology in terms of environmental and socio-economic benefits for Wales needs to be recognised.

In light of the CCC recommendations and the declared climate emergency in response to the global heating crisis there is a need for radical, transformative change – and recognition that action has to be quick and decisive. An emergency requires immediate action whereby the public policy response is critical and in that regard the NDF will be a key tool. Decisions through the planning system must be responsive to this position and at present, the outcome on this topic and in particular the proposed spatial strategy proposed for the key renewable technology of onshore wind, falls short of what is required and is too restrictive. A constructive and deliverable amendment is explained and proposed below.

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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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:

There needs to be recognition of the necessity to incorporate the central theme of global heating and climate change in both the urban and rural policies. Without such a theme running as a thread through these policies there will be a failure to recognise one of the core threats to realisation of these policies.

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?

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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 checked="" type="checkbox"/>

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

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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?

There needs to be recognition that the growth of low emissions vehicles is predicated upon decarbonised fuel, whether clean electric or hydrogen, which will need rapid and extensive delivery to meet requirements. In order to decarbonise transport fuel substantial capacities of new renewables will be required, and policy development towards renewables should not be restrictive in any way. Currently we anticipate that the proposed PARs will be limiting, will fail on the climate emergency ambitions of Welsh Government, and ultimately will not lead to the required level of decarbonisation necessary to secure greater certainty on our shared future.

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

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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?

The following commentary pertains to Policies 10 -13 of the draft NDF. In essence we believe that the allocation of defined spatial areas for onshore wind power will not lead to the delivery of sufficient new renewables capacity to decarbonise power and heat generation, and the needs for the clean electrification of transport, and overall is too restrictive.

Policies as they stand will not deliver on the 2025 renewable capacity and 2050 near zero GHG emissions targets. That is not just an assertion, it is the evidential position based upon the recommendations of the CCC, as noted above.

We recommend that instead of specific defined geographical areas ('Priority Areas') that a criteria-based approach to all parts of Wales, outside of landscape and environmental designations, would be a more supportive approach to enable the maximization of renewables capacity. Such an approach can retain the 'checks and balances' of policy safeguards. Furthermore, the approach must be supported in general by an application of the presumption in favour to all new renewables capacity, principally on the basis of the extremely critical need for action on global heating.

1. Introduction

Eco2 and Statkraft, both leading renewable energy providers with a long history of operating in Wales, are collaborating on two early stage, strategic scale wind energy developments.

Eco2, a Wales-based clean energy company, specialises in the development and delivery of renewable energy projects throughout the UK and Europe. Established in 2002, the company has since met with success with projects including onshore wind, landfill gas and biomass. Whilst biomass has historically played a major role in their renewable energy portfolio, Eco2 has successfully developed large-scale wind farms in Wales, including the 36.5MW scheme at Mynydd y Betws in Carmarthenshire which at the time offered the largest community benefit package in Wales.

Statkraft is one of Europe's largest renewable energy generators, with a core business comprising hydropower, wind power, solar power, gas power and district heating across approx. 20,00MW of installed generation. Among their assets are the 49.9MW Rheidol Hydro Power Station and the 23MW Alltwalis Wind Farm located in Carmarthenshire, West Wales.

The extensive experience of our two organisations in the renewable energy sector confirms that we have credibility to respond and that we have an implicit understanding of typical site development requirements.

Together we believe that the aspirations of Welsh Government towards reductions in GHG emissions and renewable energy targets are laudable and we encourage, wherever practicable, even greater ambition if we are to make a meaningful difference for future generations. The likely scale of roll-out of new renewables capacity to decarbonise power, heat and transport is eye watering, and in general we encourage a less restrictive approach to renewables deployment.

2. Wind energy development potential

Eco2/ Statkraft have optioned landowner rights over two large expanses of land in south and west Wales for the purpose of developing substantial wind energy schemes. The sites have been selected on the basis of their excellent potential for wind energy capture and, largely, an absence of environmental or planning sensitivities that as a result demonstrate good development potential for each site. As matters currently stand, both these sites would be outside of the Energy Priority Areas, and would not therefore benefit from a presumption in favour of development, likely resulting in more protracted planning battle to prove their merits. Given the current critical nature of delivering renewables capacity as rapidly as possible, exclusion of these sites would not be in the national interest. However, one of the sites is proximate to, and shows similar characteristics to SSAD, whilst the other site is located within SSA F. Under TAN8 the sites would likely accord to planning policy guidance formulated back in 2005, but would not meet the criteria applied to the formulation of the NDF energy priority areas. There is, as such, a clear inconsistency in planning policy that does not benefit renewable energy ambitions in Wales.

Statkraft / Eco2 are aware of the evidence base work conducted on behalf Renewables UK Cymru and which forms part of their formal submission to the NDF consultation. The same development criteria have been applied to the areas we have for the optioned wind farms and we are confident that there is sufficient unconstrained areas suitable for substantial wind power projects, subject of course to site surveys, design and sequential testing.

Currently we anticipate that there is potential for:

- one a scheme comprising up to 24 wind turbine generators, equal to a 96MW scheme based up a 4MW generator. Based upon a 35% capacity factor, which is based upon the expected wind resource profile at this Site at the expected hub height, such a scheme could lead to GHG offsetting (associated with fossil fuel combustion) up to 105,000 tonnes annually;
- a further scheme comprising up to twenty wind turbine generators, equal to a 80MW scheme when modelled with a 4MW generator. Based upon a 30% capacity factor, such a scheme could lead to GHG offsetting (associated with fossil fuel combustion) of up to 73,500 tonnes annually.

The additional benefits that may accrue from these schemes include, for one project, regionalised grid strengthening in a remote part of Wales, that may then support further economic development and contribute to the needs for the electrification of transport, along with localised economic and social rewards through employment, local contracts and distributed benefits arising from both schemes thereby making a substantial contribution to Well-being Goals for the region.

Dependent upon the outcome of critical path studies, we anticipate that the developments have potential for commissioning by 2024, thereby making an early stage contribution to the 2030 target for 70% of electricity generation from renewables. These schemes therefore offers realistic opportunities for significant contributions to Welsh Government ambitions.

3. NDF – spatial mapping and restrictive policy approach

The limitations of the current proposed NDF EPA approach, set out from page 36 *et seq* of the draft NDF, include:

- Limited defined Priority Areas;
- Lack of acknowledgement of the new scale of wind turbines that are required in the current situation of no public fiscal support for onshore wind (thus necessitating greater flexibility in planning / development management tests).
- Serious concerns regarding the technical identification of Priority Areas: Arup appear to have overlooked several critical development criteria: property buffers, MoD training areas (Sennybridge), operational wind farms and grid availability (thus falling into the former SSA 'trap' of the absence of infrastructure for distribution and transmission). As per the R-

UK Cymru submission to the draft NDF, these factors appear to sterilise the majority of Energy Priority Areas from development, especially in the context the new, greater scale of wind energy generators. This will be a significant and unnecessary brake on onshore wind deployment.

- Confusion arising in terms of the existing SSAs and how these are to be treated, especially as they still have much further potential to deliver required onshore generation capacity.

Evidence from Scotland is that a criteria-based approach is preferred and has greater efficacy (i.e. by way of Scottish Planning Policy (SPP) 2014). In this regard it is important to note that the Scottish Government consulted in 2016/17 on a draft Onshore Wind Policy Statement (OWPS) which considered potential options for a strategic approach to wind farm site development, including the identification of new sites where the greatest capacity could be achieved – i.e. a similar approach to that now proposed for onshore wind in the draft NDF.

However, based on a wide-ranging review of evidence and numerous responses from industry, the Scottish Government decided that the current system of a criteria-based approach to development management with landscape and environmental designation spatial restrictions represented an effective and efficient process for yielding new development capacity and for considering applications for developments. Many Scottish stakeholders believed that the existing system has worked effectively thus far, and can continue to deliver projects that will help the Government achieve renewable energy targets.

Onshore wind projects face a highly uncertain route to market. The arrangements which have enabled onshore wind to expand and to reduce its costs successfully, are no longer in place. Continued innovation and cost reduction, including a move to larger turbines, needs a more supportive planning system and policy approach, and certainly a less restrictive one.

Continued advances in turbine and blade technology will help close the gap that currently exists and help enable a route to market. The current ‘2 tier’ proposed system of spatial areas as set out in the draft NDF will not be conducive to that outcome.

Overwhelmingly, we argue that should the NDF be adopted with current energy priority areas it is likely, as evidenced by the R-UK Cymru consultation submission, that very little new large-scale wind capacity will come forward, thus failing the interests of current and future generations. Accordingly, a criteria-based approach for new renewables capacity, all of which should benefit from a presumption in favour of development, is required if we are to make the quantum leap to a decarbonised future.

4. Recommendations for reformulating the NDF

It is recommended that the spatial strategy approach of Energy Priority Areas which results in a sequential two tier policy approach be removed. At present,

Policy 10 which relates to development in Priority Areas states that “significant weight” should be given to benefits and that here there should be a “presumption in favour”. In stark contrast, Policy 11 which relates to development out with Priority Areas, is silent on weight to benefits and the presumption: the implication must be there is no presumption and there is inevitable ambiguity as to how ‘benefits’ will be handled in the planning balance with regard to weight. This will lead to poor outcomes and will not maximise Wales’ renewables potential.

Before explaining an alternative approach: note that both of these draft policies contain exactly the same list of criteria, except in Policy 10 it needs to be shown that “adverse impacts have been minimised” and in Policy 11 that there would be “no unacceptable adverse impacts”. This contrasting language is open to interpretation. The policy test should be clear and consistent – namely, a proposed development must demonstrate the effects arising can be satisfactorily addressed (i.e. such that they are acceptable).

The recommended alternative approach is therefore a criteria based approach, which, it must be stressed, would contain the same level of policy / development management safeguards should it be followed.

In short, all of Wales should be open to wind development, except within designated national assets such as National Parks and other national and international level nature conservation designations. In this regard the Scottish ‘Spatial Framework’ approach as set out in Table 1 of SPP provides a clear, simple, robust policy approach on a national basis, complemented by ‘criteria’ (considerations) set out at paragraph 169 of SPP.

Furthermore, in the context of the climate emergency all new renewables development should benefit from a presumption in favour of development – the test for which should be that the presumption applies, unless the resultant environmental effects significantly and demonstrable outweigh a project’s benefits.

Given the typical development criteria for solar energy, which do not include the substantial property buffers required for onshore wind, we advise that the proposed Priority Areas could be retained for solar, and so the invested time in delineating them would not be lost.

There also needs to be a clear message with regard to former SSAs, namely that that they should be retained due to the considerable history and time invested, and their remaining potential to deliver a large volume of onshore wind power; however, the SSAs should only be retained in so far as previous planning policy has supported their utilisation, and a new criteria based approach should apply to them as with any other areas out with nationally designated landscapes and nature conservation areas.

Moreover, there is a necessity for clear technical and planning guidance to sit alongside the NDF (inclusive of development management criteria) to acknowledge the evolving turbine technology. Such guidance is not currently

available in PPW and the extant technical guidance in TAN8 is outdated in the context of the new wind turbine scales on the market.

Finally, consideration could be given to innovative policy approaches in light of the climate emergency, such as allowing a more permissive approach to the siting of onshore wind close to landscape designations, but ensuring that the duration of consents are time limited (i.e. not in perpetuity) thereby ensuring reversibility if that is in the public interest in the long term, relative to the attainment or otherwise of net zero legally binding targets.

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	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"/>

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

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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.

None

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?

None

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?

No comment

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.

No comment

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?

Nothing further

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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