



Welsh Government

National Development Framework consultation

Cover Letter

Sent to: ndf@gov.wales

Dear Sir/Madam

1. Thank you for the opportunity to respond to the draft National Development Framework Consultation Draft. The attached form sets out Horizon's response in respect of those matters with direct and indirect implications for our interests in Wales.
2. The following information within this covering letter sets out the background to those interests and provides an update on the progress with the Wylfa Newydd Project

Horizon Nuclear Power

3. Horizon was established in 2009 following the UK Government's announcement that new nuclear energy would be a core element of the future electricity mix. The company was acquired by Hitachi, Ltd. in late 2012 following a competitive commercial process, which included meeting a number of criteria in key areas set out by the UK Government.
4. Horizon owns two of the eight sites designated in the UK for new build in the National Policy Statement for Nuclear Power Generation¹ and up until January 2019 it was actively developing its lead site, Wylfa Newydd on Anglesey, North Wales. Horizon had planned to provide at least 5,700MW of new power station capacity to the UK – enough to power some 11 million homes – across the two sites, with Oldbury in South Gloucestershire following on from Wylfa Newydd. The sites would have each seen the deployment of two Hitachi-GE UK Advanced Boiling Water Reactors (UK ABWRs), each generating around 1,430MW.
5. In January 2019, following a decision by its parent company, Hitachi, Ltd., Horizon announced that it was suspending its nuclear development programme and has now stopped the vast majority of its development activities.² This followed seven years of very significant investment from Hitachi and intense work across all areas of development, which is detailed further below.

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47859/2009-nps-for-nuclear-volume1.pdf

² <https://www.horizonnuclearpower.com/news-and-events/news/news-details/568>

Overview

6. Horizon, since its creation in 2009 and, in particular since its acquisition by Hitachi, Ltd. in 2012, had been making very strong progress in developing its two sites, led by Wylfa Newydd on Anglesey. Key areas of progress include:
 - Completion of the nuclear regulators' Generic Design Assessment for the Hitachi-GE UK ABWR, based on its tried and tested reactor design;
 - Submission of its 41,000-page main planning permission, the Development Consent Order (DCO), to the Planning Inspectorate. Despite the suspension, we took the decision to continue with the DCO and it is now scheduled to be determined by the Secretary of State for Business, Energy & Industrial Strategy at the end of March 2020. This will help support a shortened development phase should a suitable new funding and financing model be developed;
 - Clearance from the EU for the main Euratom obligations;
 - Submission and advancement of all other major permits, permissions, and approvals;
 - Significant development and preparatory work at the Wylfa Newydd site, which represents one of the best nuclear new build sites in the UK;
 - Huge organisational development which saw the company grow from some 80 people to around 370 (with an additional c.1000 supporting in the supply chain), including development of operations capabilities in preparation for generation;
 - Major advancement of detailed engineering and design work, ready to move into the construction phase;
 - The establishment of a delivery team with experience of over 170 nuclear power projects, ready to take Wylfa Newydd through the construction phase;
 - Strong stakeholder support and backing, including from the communities around the sites and, in particular, from the Isle of Anglesey County Council, North Welsh regional bodies, and the Welsh Government; and
 - A major focus on cost reduction activities, such that Horizon was ready to deliver its first units at Wylfa Newydd for a Strike Price materially lower than that agreed for Hinkley Point C, with an even lower price for subsequent units.
7. These achievements meant that Horizon was actively preparing to be the next nuclear new build project in the UK to enter construction. The final component required to move from development into construction was agreement on the funding and financing for Wylfa Newydd. In June 2018 the Secretary of State for Business, Energy & Industrial Strategy made a Statement³ to Parliament announcing that the Government and Horizon were entering formal negotiations with the possibility of HMG taking a direct equity stake in the project.
8. Unfortunately, despite the best efforts of all parties, acting within their own specific constraints (e.g. commercial position, balance sheet restrictions, existing policy etc.), it

³ <https://www.gov.uk/government/speeches/statement-to-parliament-on-horizon-project-at-wylfa-newydd>



was not possible to reach a deal that worked for all sides. This, ultimately, led to the decision in January 2019 to suspend activities as the project was not fully funded.

9. Following the suspension decision, Horizon has moved to cease almost all its development activities. The focus of those Horizon staff remaining has been on keeping the sites in a developable state and continuing to liaise with our host communities and stakeholders, and close engagement with the UK Government on a funding model⁴ that fully incorporates the lessons learned from the previous phase of our project development.
10. Given the key role for new nuclear power in delivering a decarbonised electricity system, alongside the huge socio-economic benefits that nuclear brings, there is a clear need for projects such as Wylfa Newydd. With this in mind, and building on the fundamental strengths of the project – tried and tested technology, robust local support, the best new build site in the UK – Horizon is confident that the project can be restarted should a suitable new funding model be put in place.

Development Consent Order for Wylfa Newydd

11. In procedural terms the Wylfa Newydd DCO examination closed in April 2019. Subsequent correspondence from the Secretary of State (dated 23rd October 2019) has extended⁵ the period of determination of the DCO to consider the submission of additional information. The Secretary of State has set a new deadline for a decision of the application of 31 March 2020 which is to be confirmed in a statement to be made to the House of Commons and House of Lords in accordance with section 107(7) of the Planning Act 2008. It should be noted that Paragraph 36 of that letter invites views from Interested Parties on the NDF as it relates to Wylfa Newydd. Horizon will be making representations in that respect.

Response to the Consultation

12. The completed form represents Horizon's views on the NDF in accordance with the questions presented. Should further clarification be required Horizon would be pleased to provide additional information.

⁴ The UK Government recently finished a consultation on what is known as the Regulated Asset Base model, which, we believe, could present a viable funding model for nuclear new build:

<https://www.gov.uk/government/consultations/regulated-asset-base-rab-model-for-nuclear>

⁵ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010007/EN010007-003869-FINAL%20\(Welsh\)%20-%20BEIS%20Wylfa%20Consutlation%20Letter.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010007/EN010007-003869-FINAL%20(Welsh)%20-%20BEIS%20Wylfa%20Consutlation%20Letter.pdf)

Consultation Response Form

Your name	Horizon Nuclear Power Limited
Your address	Pioneer Place 1412 Charlton Court Gloucester Business Park Gloucester GL3 4AE
Preferred contact details (email/phone/post)	Ifere Gwyn Ifere.gwyn@horizonnuclearpower.com
<u>Organisation (if applicable)</u>	

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 checked="" 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. Horizon considers that the NDF Outcomes included within Section 3 of the draft document are generally achievable, but believes they could be made more ambitious in their scope. The stated outcomes underline the NDF focus on Wales as a place to live for its current population with little or no reference to its context, relationship and opportunities beyond Welsh borders. These relationships are significant in terms of the general sustainability of the Wales economy and environment on a day-to-day, but more so in the context of UK-wide significant projects, such as that at Wylfa Newydd.
2. The stated Outcomes appear to lack the drive and purpose that could be achieved within and beyond Wales over a 20-year period. Furthermore, there is a notable absence of a real economic purpose to the Framework as a whole and the Outcomes specifically to the extent that Horizon considers that there is a danger that an opportunity to implement a sustainable Framework and to achieve a sustainable Wales in its overreaching context might be missed.
3. Outcome 11 refers specifically to climate change and the decarbonisation of energy provision. This is an example of an opportunity missed to achieve a much clearer and positive message: that Wales is committed to the generation of decarbonised energy; that this commitment is important not just for Wales but also in a wider UK context; and to promote the planning of an economic strategy with decarbonised energy as a focal point. The urgency of the need to deliver low carbon, secure and reliable energy for the whole of the UK is not emphasised and the ambitions and aims of Prosperity for All: A Low Carbon Wales (March

2019) are not reflected in the draft NDF. This is significant: the climate change emergency that has been declared is not limited to Wales. Without co-operative cross-border working, then the ability to deal with the significant and global issues associated with climate change will not be addressed adequately. It is not an issue just for Wales and it is not an issue that Wales can deal with in isolation.

4. The Wylfa Newydd DCO Project has the potential to be a key element of such a strategy on Anglesey and in the wider North Wales context, given it will deliver enough clean electricity to power some 5.5 million homes. In addition, the Project will also deliver other significant long term and positive legacy benefits including:
 5. A more highly skilled and resilient local workforce with transferable skills;
 - Investment in education at all levels through ongoing work by Horizon and the Education Contribution will deliver improved facilities and teaching which would benefit local children, as well as those moving to the area;
 - Upgraded and new public highways; and
 - An increase in the supply of residential units within local communities, upgrades to existing indoor and outdoor leisure centres, improvements in the marketing of Anglesey as a tourism destination.
 6. It is these examples of the ability of energy projects to provide an enduring legacy benefit for a region that should be recognised, embraced and promoted through the draft Framework.
 7. Additionally, in respect of the NDF Outcomes chapter of the document, a commitment to the delivery of a joined-up infrastructure plan is notable by its absence. It would seem that the potential development of Wylfa Newydd Power Station and the potential for energy use at the former Trawsfynedd power station are the only infrastructure proposals actually identified within the NDF, with no reference to any planned or proposed significant infrastructure projects elsewhere.
 8. It is acknowledged that some of the infrastructure projects lie to be determined outside of Wales (i.e. by the UK Government) but notwithstanding this the potential within the NDF should surely exist for the Welsh Government to either identify potential major projects over the next 20 years as a minimum, and to support the consideration in principle of such projects even if there is a reluctance to commit to implementation at this stage. There is no specific reference to tidal power schemes, the enhancement of the National Grid network or major road upgrades, all of which have been high profile planning issues in Wales over the last ten years and none of which has come to fruition.
 9. Equally, there is an absence of any 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 Infrastructure Commission. In order for the NDF to be of value in respect of infrastructure, the context of these procedures need to be explained and put into context with the Wales Infrastructure Investment Plan (WIIP). The significance of the relationship between the NDF and the Low Carbon Strategy

also needs to be drawn out.

10. 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 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.

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 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 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:

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 type="checkbox"/>

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

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?

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?

[illegible]

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

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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]

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 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?

1. Fundamental to the delivery of any effective energy network is Grid infrastructure and Grid capacity: these require significant upgrade throughout the country if Wales is to achieve its stated outcome of leading the way in a sustainable, competitive and decarbonised society. The grid issues are relevant not only in respect of the generation of energy on a macro scale, but also to achieve localised distribution to the decarbonised housing developments that will be sought to be achieved over the 20-year period of the Plan.
2. Horizon considers that this is a significant omission 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 low-carbon schemes, including nuclear and renewables, within priority areas or elsewhere in Wales. The relationship of energy generation and of transmission via the National Grid in a UK context must also be recognised and considered as part of the NDF.
3. In respect of the Wylfa Newydd DCO Project the identification of the scheme within the draft NDF is welcome and important but this is not recognised in the energy section of the Framework or in respect of the need for Grid connection that would be a resulting requirement of the implementation of the Project. This omission should be rectified.
4. In more general energy terms, the sentiment of target setting is generally supported although there is no information in terms of practical delivery of Welsh

Government targets. There is no tie in with other Welsh Government strategies or plans, or with proposals and policies whether from the public or private sectors. There appears to be a heavily weighted presumption in favour of locally-owned generation schemes although there is very little commentary in terms of what that looks like in practice. Development of community owned renewables schemes is not a model that can be easily replicated throughout Wales to close the energy gap between supply and demand nor does it, alone, make a significant contribution to addressing the national decarbonisation challenge.

5. The draft NDF therefore needs to include a clear statement that there is an established, and urgent, need in Wales for a significant increase in development of low carbon energy generation projects of all sizes 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.
6. With regards to the Wales Energy Priority Areas identified on the map on Page 42 of the draft NDF, Horizon has a number of interests in land included within Area 1 on Anglesey. The NDF is not clear on whether the identification of the Priority Areas will act as a constraint on the potential for other developments within those areas (i.e. whether there is a presumption in favour of renewable energy at the expense of other types of development). Horizon request clarification on the relationship between potential renewable energy areas and other forms of development.

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 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.

[illegible]

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 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.

1. As one of the few specific projects identified within the entirety of the NDF it is important that clarification is given in respect of the Wylfa Newydd DCO Project as identified on page 54. Its reference within the North Wales Region section as opposed to in the policies regarding energy should be reviewed.
2. As a Nationally Significant Infrastructure Project (NSIP) as defined by the Planning Act 2008, the DCO application is to be determined in accordance with the overarching National Policy Statement (NPS) for Energy (EN-1), the NPS for Nuclear Power Generation (EN-6) and other important and relevant planning policy documents identified in the application documents and discussed during the DCO examination. The Wylfa Newydd site was allocated for new nuclear power generation development within NPS EN-6. Due to the intention of EN-6 to apply to new generating stations that would be deployed (operational) by 2025, the UK Government issued a statement on 7th December 2017¹ to clarify the role of nuclear power in UK energy policy and the applicability of NPS EN-6 in decision making.
3. The Ministerial Statement confirmed that new nuclear power stations have an important role to play. The UK Government's Industrial Strategy identified nuclear power generation as being vital to the country's energy mix, providing low carbon power for current and future needs. The UK Government's policy principle is maintained as being to take active steps to help facilitate the construction of new nuclear power generation. Assessment of need for new

¹ <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Lords/2017-12-07/HLWS316/>

electricity generation carried-out to support NPS EN-1 remains valuable and continues to be relevant. Based on projections stating that overall demand for electricity is expected to increase by 2035, the Ministerial Statement further confirms that nuclear power generation remains key to meeting the UK's 2050 carbon reduction obligation. The Government position is that it is important that there is a strong pipeline of new nuclear power to contribute to the UK's future energy system.

4. This background to the determination process of the Wylfa Newydd DCO Project is therefore highly relevant for the duration of the NDF period to 2040 and it is important that this is recorded accurately within the adopted NDF at the time of its final adoption, anticipated to be September 2020. Significantly, the text regarding Wylfa Newydd (Policy 22) and its supporting text does not explicitly refer to the significant contribution to the delivery of the urgent need for decarbonisation of energy. Whilst it is important that the economic and other benefits are identified it is also significant that the fundamental reason for the potential nuclear power station development is to make a significant contribution to the supply of clean electricity during and beyond the NDF throughout the UK.
5. The importance of this issue is demonstrated both by the Welsh Government's declaration of a climate emergency², which emphasised the importance of delivering a low carbon economy, and the UK Government's legislation for a Net Zero 2050 target. As the Committee on Climate Change itself stated in its 'Net Zero' report³ *"power sector decarbonisation does not rely on variable renewables alone, but a portfolio of technologies including nuclear power"* and this position is backed up by many other independent, authoritative sources such as National Grid in its *Future Energy Scenarios*⁴, the International Energy Agency⁵, and the MIT in the US⁶. Given the weight of evidence on how nuclear will support efforts to deliver a decarbonised power system, the potential development of a new nuclear project in Wales within the NDF period needs to be given greater prominence and weight.
6. The requirement for prompt action to facilitate and encourage economic development in Anglesey and North Wales is not adequately recognised within the NDF. It is the stated policy of both the Welsh Government and the Isle of Anglesey County Council to promote economic growth on Anglesey. Horizon supports this intention and also the designation by the Welsh Government of the Enterprise Zone on the island. This initiative is not recognised by the draft NDF and significantly, nor is any other Enterprise Zone in Wales. It would seem eminently sensible to recognise these and use them to focus economic development.
7. Horizon will create a significant number of jobs in an area where more employment is needed, and a substantial package of measures has been

² <https://gov.wales/welsh-government-makes-climate-emergency-declaration>

³ <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> & <https://www.theccc.org.uk/publication/net-zero-technical-report/>

⁴ <http://fes.nationalgrid.com/media/1409/fes-2019.pdf>

⁵ <https://www.iea.org/publications/nuclear/>

⁶ <http://energy.mit.edu/research/future-nuclear-energy-carbon-constrained-world/>

proposed in the DCO to help make the most of this project benefit locally. The first objective of the Anglesey Enterprise Zones is to “Grow the local economy and provision of new jobs” and is focused on the energy sector. This opportunity to connect regional policies, economic growth and energy has been missed within the NDF.

8. The baseline assessments undertaken to support the DCO application show that Anglesey has far fewer jobs per working age resident (0.63) than either North Wales (0.79) or Wales as a whole (0.74). Anglesey would require an additional 3,500 jobs to achieve the average for Wales (and 5,000 to match North Wales). The development of the Wylfa Newydd DCO Project would therefore help to deliver a key government policy, the objective of which is to address the recognised economic deficiency of Anglesey.
9. The Wylfa Newydd Project is therefore an important part of the solution to the main labour market problem facing Anglesey. Horizon believes its package of investment through the proposed Jobs and Skills Strategy (JSS) and accompanying Skills Fund will enable the benefits of the project to be enhanced and wider labour market risks to be managed, delivering a strong positive economic benefit to Anglesey and North Wales during both the construction and operational phase. Horizon believes that the flexible package of skills support measures it is putting in place are capable of both enhancing the benefits of the scheme and helping to manage the risk of non-significant impacts and the difficulties that may arise in recruitment for local businesses.
10. The operational phase will also deliver direct long-term economic benefits through the estimated operational workforce of 850, providing significant local employment opportunities and continued support for local businesses. It is expected that around 85% of the operational workforce would be local people supporting a reduction in outward migration trends. There are also significant initiatives to enhance the Welsh language in direct and indirect response to the construction and operation of the Power Station.

General North Wales Region Comments

11. Horizon has reviewed other policies and comment below as they might have direct or indirect implications during the construction and operation of the Wylfa Newydd DCO Project:
 - strong emphasis is placed on the collaborative working across the region but it is unclear whether this translates into a single SDP or two;
 - the housing figures for North Wales are significantly lower than recent planned provision. The NDF allocates a 19% proportion of housing need to North Wales which equates to 19400 homes over a 20-year period. This figure divided by 20 equates to an annual housing need of 970 homes. The combined figure for the current LDPs (noting that Flintshire and Wrexham are deposit plans so this figure may change) is 2376. The NDF housing figure therefore is 59% lower, 47% of which are allocated as affordable (social housing or intermediate rent) and the implications for housing provision within North West Wales and across the region are potentially significant;

- In the context of the proposed departure of the UK from the EU, it is likely that Holyhead Port will experience significant change in terms of its relationship with the movement of goods into and out of the European Union. Holyhead as a primary port town is recognized in the NDF but notwithstanding the current uncertainty in the there is an opportunity and a need to its connectivity in terms of the wider North East Wales proposals is fragmented warranting further explanation;
- Current/planned projects which could have an influence on this region include:
 - Third Menai Crossing – (Start date: 2020/2021, End date: 2022/2023).
 - Caernarfon Bypass – under construction (last section of North to South improvements)
 - Pinch point improvement schemes – Welsh Government (removal of roundabouts on A55)

The first two schemes will improve this intersection and the North-South connectivity which is poorly represented on the regional diagram. Little reference is given to the A55 being the primary arterial route running through the region.

- Other than its recognition on the regional diagram there is no reference to Anglesey Airport, its benefit of interconnectivity with the capital, potential expansion or its relationship with the other transport routes in the region.

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.

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?

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?

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.

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?

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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