

From: [Edwards, Steven](#)
To: [NDE](#)
Cc: [Dobbins, Russell \(ESNR-Planning\)](#)
Subject: Draft National Development Plan Consultation
Date: 15 November 2019 14:03:25
Attachments: [image002.jpg](#)
[image004.jpg](#)
[SPEN Response Summary WG National Development Framework Consultation 2nd DRAFT \(non-tracked\).docx.pdf](#)
[draft-NDF-response-form SPEN comments.pdf](#)
[Wales Energy Priority Areas Plan1 191031.pdf](#)
[Wales Energy Priority Areas Plan2 191031.pdf](#)

NDF Team

Thank you for your consultation regarding the above document and please see attached our response, on which I would be grateful if you could acknowledge receipt.

In summary, we support most areas of the document however see that some areas, notably in relation to renewable energy, would benefit from further review and changes to the draft policies. To this end, we suggest that there is a need for further engagement and welcome the opportunity to discuss this with you.

Regards

[Steve Edwards](#)

[cid:image001.gif@01CA4CB9.702F4FD0](#)



[Land & Planning](#)

[Senior Environmental PlannerTel:](#)

MMBEN19



=====

Please consider the environment before printing this email.

If you have received this message in error, please notify the sender and immediately delete this message and any attachment hereto and/or copy hereof, as such message contains confidential information intended solely for the individual or entity to whom it is addressed. The use or disclosure of such information to third parties is prohibited by law and may give rise to civil or criminal liability.

The views presented in this message are solely those of the author(s) and do not necessarily represent the opinion of Scottish Power Energy Networks Holdings Ltd. or any company of its group. Neither Scottish Power Energy Networks Holdings Ltd. nor any company of its group guarantees the integrity, security or proper receipt of this message. Likewise, neither Scottish Power Energy Networks Holdings Ltd. nor any company of its group accepts any liability whatsoever for any possible damages arising from, or in connection with, data interception, software viruses or manipulation by third parties.

=====

NDF Team,
Planning Policy Branch,
Welsh Government,
Cathays Park,
Cardiff
CF10 3NQ

Date
15th November 2019
Contact / Extension
Steve Edwards
[REDACTED]

Dear Sir/Madam

NATIONAL DEVELOPMENT FRAMEWORK 2020-2040 CONSULTATION

Thank you for the opportunity to respond to the above mentioned Consultation.

SP Energy Networks is responsible for the distribution electricity network in the SP Manweb licenced area which covers North Wales. We have extensive experience of environmental and planning matters in Wales, England and Scotland.

We welcome the Welsh Government's publication of its draft National Development Framework (NDF) - as a basis for developing a final Framework - with a twenty year lifespan to 2040 setting national priorities in the plan-led system. We note the draft NDF includes policies for sustaining and developing a vibrant economy and progressing with decarbonisation. We broadly support the draft NDF, aimed at directing the planning of investment for new infrastructure at a national level which is needed to achieve the Net Zero carbon emissions target that our business has at the heart of its investment plans. Given the importance of making timely progress towards meeting the Net Zero emissions challenge we would encourage the pace of change to be faster and the NDF process presents us with a unique opportunity to provide a framework to aid quicker planning and decision-making on proposals that will deliver significant benefits to customers and wider society in achieving a Net Zero target.

The following is a summary of where SP Energy Networks supports the draft NDF and our comments as to where we see scope to develop policies further, to promote timely planning decisions in a way that is consistent with meeting the Net Zero challenge. We provide our comments on the following key themes that have the greatest relevance to our operations. Our comments here on the draft NDF are supported by a more detailed our response, in the consultation questionnaire, which accompanies with this letter.

Sustainable Travel – Transition to Ultra Low Emission vehicles

SP Energy Networks strongly supports the transition to ultra low emission vehicles in Wales as proposed in **Policy 7** (*Welsh Government support for increasing use of ultra low emission vehicles and the roll out of electric vehicle charging infrastructure in new development*).

To achieve this, the existing local Low Voltage networks in North Wales, designed in the mid-20th century, will see a significant change in utilisation and will need to be enhanced to support the roll out of visible charging infrastructure for electric vehicles (EVs) across Wales. We are engaging with the energy regulator (Ofgem), calling for an appropriate framework of support for SP Energy Networks - as the network operator with experience in managing efficient and safe electricity networks - having the principal design and planning role in delivering EV charging infrastructure. A key aspect of our engagement with Ofgem is to highlight the importance of anticipatory investment being facilitated in a way that will deliver timely progress with the roll-out of EVs, as recommended by the Committee on Climate Change in its Net Zero report¹.

Through our own Project Charge initiative in North Wales, SP Energy Networks is assessing innovative solutions for connecting EV charging points to the electricity network in a way that balances network capacity and the needs of motorists. The project will identify prime locations where charge points are needed, enabling the roll out of charge points to be more efficient and for the network itself to be adapted, to best meet the needs of EV users.

SP Energy Networks sees the benefits of a planning policy that supports its investment in new network solutions necessary for the increased use of EV charging infrastructure. We do, however, suggest that the policy should be clear in recognising that charging infrastructure is not only within new developments but also needed elsewhere from new development. As such, the policy needs to support rapid charging at wherever suitable locations are identified. In addition, this is a timely opportunity to link regional planning policies with strategic priorities, including the associated grid reinforcement, required for the roll out of EV charging points. Such changes would undoubtedly speed up delivery of EV charging infrastructure.

Renewable Energy (Wind and Solar Energy in Priority Areas)

We agree that generating renewable energy at scale is key to decarbonisation. Indeed, we note that the Committee on Climate Change envisages a quadrupling of renewable generation in the UK by 2050 in its Net Zero report². Accordingly, we support the ambitious target stated on page 36 of the draft NDF for 70% of electricity consumption to be generated from renewable energy generation by 2030, thereby building a resilient decarbonised economy. We broadly support a spatial approach to achieve this, noting the following:

¹ [“Net Zero – The UK’s contribution to stopping global warming”](#), Committee on Climate Change (2019)

² [“Net Zero – The UK’s contribution to stopping global warming”](#), Committee on Climate Change (2019)

- **Policy 10** (*Wind and Solar Energy in Priority Areas in the Spatial Strategy: The Welsh Government supports large scale on-shore wind and solar energy development in the identified Priority Areas for Solar and Wind Energy*); and
- **Wales Energy Priority Areas Plan** page 42 where SP Energy Networks notes the Priority Areas nos. 1, 2, 3, 4, 5, 6 and 15 are within its SP Manweb licenced area.

However, we wish to highlight that SP Energy Networks considers that the justification for identifying the extent and limits of the final Priority Areas must be robust and should properly take account of the views of the wide range of stakeholders participating in this consultation process, including the perspective of renewable energy developers. This is essential if the Welsh Government is to attract the scale of investment in renewable energy projects needed to meet decarbonisation goals. In this context, we understand that Renewables UK Cymru has looked at the proposed Areas in detail and consider that the assessment that underpins the identification of the Priority Areas appears to be somewhat flawed.

Our view is that a reassessment of the Priority Areas as part of this consultation exercise should not unduly delay the development of the finalised NDF. However, we would agree that a combination of the existing Strategic Search Areas (SSAs) and Priority Areas (with revisions) which broadly represent developer and environmental constraint interests, could indicate where there is a presumption in favour of onshore wind development proposals. The NDF should show these areas as a hatching notation as used to show the national growth areas in the regional plans included elsewhere in the NDF.

SP Energy Networks sees that such a spatial approach based on revised Priority Areas will support the case for the necessary additional grid infrastructure. Plan 1 (enclosed) shows the existing high voltage network in the SP Manweb licenced area which does not currently have capacity to support the renewable energy targets in the draft NDF. In this context, SP Energy Networks supports the additional text to Policy 10 on page 36 which states: “*The development of Priority Areas will assist in co-ordinating strategic action, bringing a critical mass of new renewables developments together to build the case for new or reinforced grid infrastructure. We will work with relevant stakeholders to help unlock the renewable energy potential of these areas and the economic, social and environmental benefits they can bring to communities.*” This approach should enable efficient and coordinated investment of shared grid connections and avoid multiple piecemeal connection proposals potentially associated with a non-spatial approach.

We therefore encourage the Welsh Government to go further and follow the approach adopted in the Scottish Government’s National Planning Framework which identifies strategic grid infrastructure alongside the broad Priority Areas; the strong justification for this being the need to achieve the Net Zero target. Plan 2 (also enclosed) is our example of how the revised Priority Areas plan and grid infrastructure should be shown in the finalised NDF.

SP Energy Networks recognises that the design of new and reinforced grid infrastructure, which connects renewable energy, will need to include greater inter-connectivity where locally generated supply is actively managed through demand-led smart grid systems, including increased battery storage. We are working collaboratively with the Welsh Government during the draft NDF consultation period to inform how smart grid networks can best deliver the renewable energy targets identified in the draft NDF, including the take up of this generation at a local level through managed demand systems. SP Energy Networks will continue to work with the Welsh Government to ensure the appropriate smart grid strategy is embedded in the final NDF.

SP Energy Networks has already supported the transfer of consenting powers to the Welsh Government, currently in the form of the Developments of National Significance process, as legislated for in April 2019, which we see as a measure for also speeding up decision-making on strategic renewable energy schemes. We also support the input from National Grid Transmission Operator, the UK Government's Department for Business, Energy and Industrial Strategy (BEIS) and Shropshire Council, bodies with whom we already have a strong stakeholder relationship. It is particularly important that SP Energy Networks and the Welsh Government work with these stakeholders in developing cross border policy statements for renewable energy in the NDF.

Our strongly held view is that Policy 10 and the Priority Areas plan as drafted lacks substance and should include reference to amended Priority Areas. We would also encourage the Welsh Government to go further and include a new policy for required associated infrastructure, including smart networks, with a view to speeding up the delivery of renewable energy and associated grid reinforcement. Such a policy would provide the right framework for the new consenting powers that the Welsh Government now holds. We recognise such new infrastructure would be subject to the environmental criteria referred to in Policy 10. We are therefore requesting amendments to Policy 10 to incorporate a new **Policy 10A** which would read as follows:

“Policy 10A Electricity Grid Infrastructure: new and reinforced electricity grid network will facilitate increased renewable electricity generation and support essential upgrades to modernise to provide smarter distribution networks. The environmental impacts of this type of infrastructure require careful management and mitigation”.

SP Energy Networks sees a place for **Policy 11** (*Energy Schemes outside the Priority Areas*) in the event of the wider revised Priority Areas not delivering sufficient generation to meet decarbonisation targets. These would be considered as a supplementary type of policy and would still need to refer to the associated grid upgrades required.

In order to further develop a revised framework of Priority Areas as part of the NDF finalisation process, we would suggest that the Welsh Government hosts a consultation workshop with the relevant stakeholders, including SP Energy Networks, to finalise this

policy framework. Such a move should ensure that the Welsh Government has a robust NDF in place by 2020.

The Regions - North Wales and Mid Wales

SP Energy Networks supports **Policy 17** - Wrexham and Deeside (*The Welsh Government supports Wrexham and Deeside as the primary focus for regional growth and investment*) which concentrates growth in existing urban areas. This approach facilitates more efficient investment in the network infrastructure necessary to support the wider objectives of the draft NDF. SP Energy Networks is already engaging with the North Wales Growth Deal to deliver network investment. To this end, SP Energy Networks supports the additional policies, Policies 18-21 referred to in the draft NDF for the region. Similarly, SP Energy Networks, being active in the Energy Island partnership, is supportive of **Policy 22** identifying *North West Wales as a location for new energy development and investment*.

SP Energy Networks notes the acknowledgement given in the supporting text on page 56 to the Mid Wales region's contribution to decarbonisation and climate change. We consider that this complements the schematic diagram on page 55 which highlights the 'significant renewable energy potential' in Mid Wales. Given the emphasis on what the Mid Wales region offers to the national planning strategy, SP Energy Networks suggests that a specific additional policy, as with the North West Wales Energy Policy 22, is included to address the sub-region's role and support the faster delivery of renewable energy proposed in Policy 10. This additional **Policy 22A** would enable the region to build on its existing strengths and pursue opportunities to grow in prosperity, key objectives of a Growing Mid Wales Partnership.

Other Policies and Aspects of the NDF

In addition to the above, SP Energy Networks supports Outcome 11 which states:

"The 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. 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."

Indeed, we consider that the Welsh Government's objective for supporting a decarbonised society as stated in Outcome 11 sits squarely with SP Energy Networks' own objectives for future investment. We would suggest this Outcome should be an overarching aim for the whole of the NDF and drive other Outcomes and Policies. Outcome 11 drives the infrastructure needed to achieve the Net Zero target.


Where not otherwise referred to specifically, SP Energy Networks raises no comments in respect of other policies referred to in the NDF.

Concluding Summary

With the benefit of years working within the northern half of Wales and relevant planning systems, SP Energy Networks is very familiar with the sustainable, economic and social challenges of transitioning to a net zero economy. A new National Development Framework provides an opportunity for SP Energy Networks to ensure our own significant network investments can be brought forward quicker within a planning framework that supports the timely delivery of the changes needed to meet Net Zero. SP Energy Networks considers that the draft NDF broadly sets out a way forward, though we have identified areas where there is scope to review policies in relation to sustainable travel, renewable energy and regional growth. In particular we consider that the Priority Areas for renewable energy development need to be reviewed, as mentioned above. In making such revisions as part of this consultation process, we consider that the final NDF can provide the right planning framework for attracting the required investment in Wales to meet the Net Zero target, whilst delivering the required infrastructure to 2040.

SP Energy Networks would be pleased to discuss any of the above in more detail and offer the opportunity to meet when convenient, or to contact Steven Edwards on 0141 614 5656 in the event of you requiring any further information.

Yours faithfully,



Steven Edwards

Senior Environmental Planner for SP Energy Networks on behalf of SP Manweb plc

Enclosures

- Consultation Response Form
- Plan 1
- Plan 2

Consultation Response Form

Your name	Steven Edwards
Your address	Land & Planning SP Energy Networks 3 Prenton Way Prenton Merseyside CH43 3ET
Preferred contact details (email/phone/post)	Steven.edwards@spenergynetworks.co.uk [REDACTED]
<u>Organisation (if applicable)</u>	SP Energy Networks

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

Outcome 11 is the key Outcome and should be the overriding objective for Outcomes 1 to 10

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 checked="" 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 checked="" 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:

None

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 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 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 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?

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

Policy 7 needs to refer to:

- a) locations outside of new developments being utilised as rapid charging locations and not just within new developments; and
- b) regional policies later in the plan that concentrate growth in key urban centres

Please refer to covering letter.

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

Need to reconsider Priority Areas approach and wording of Policy 10

Please refer to covering letter.

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 checked="" 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.

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

Need additional policy to support renewable energy potential in Mid-Wales.

Please refer to covering letter.

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.

Support

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?

Support

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?

Support

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.

None

15. Further comments

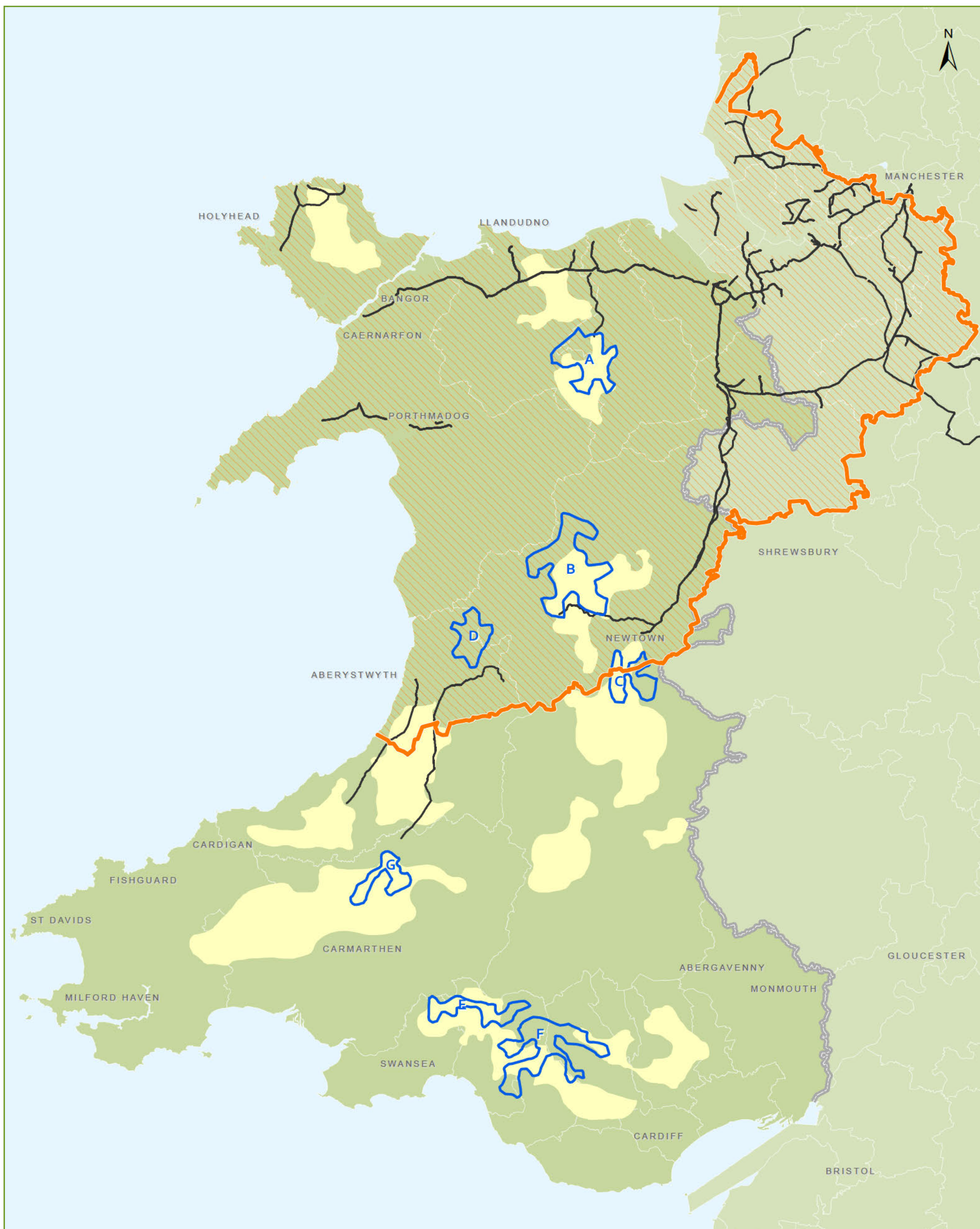
- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

Generally, very supportive and suggest scope for NDF to drive forward the net zero agenda. Suggest a follow up workshop to agree renewable energy delivery matters.

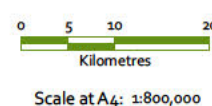
16. Are you...?

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

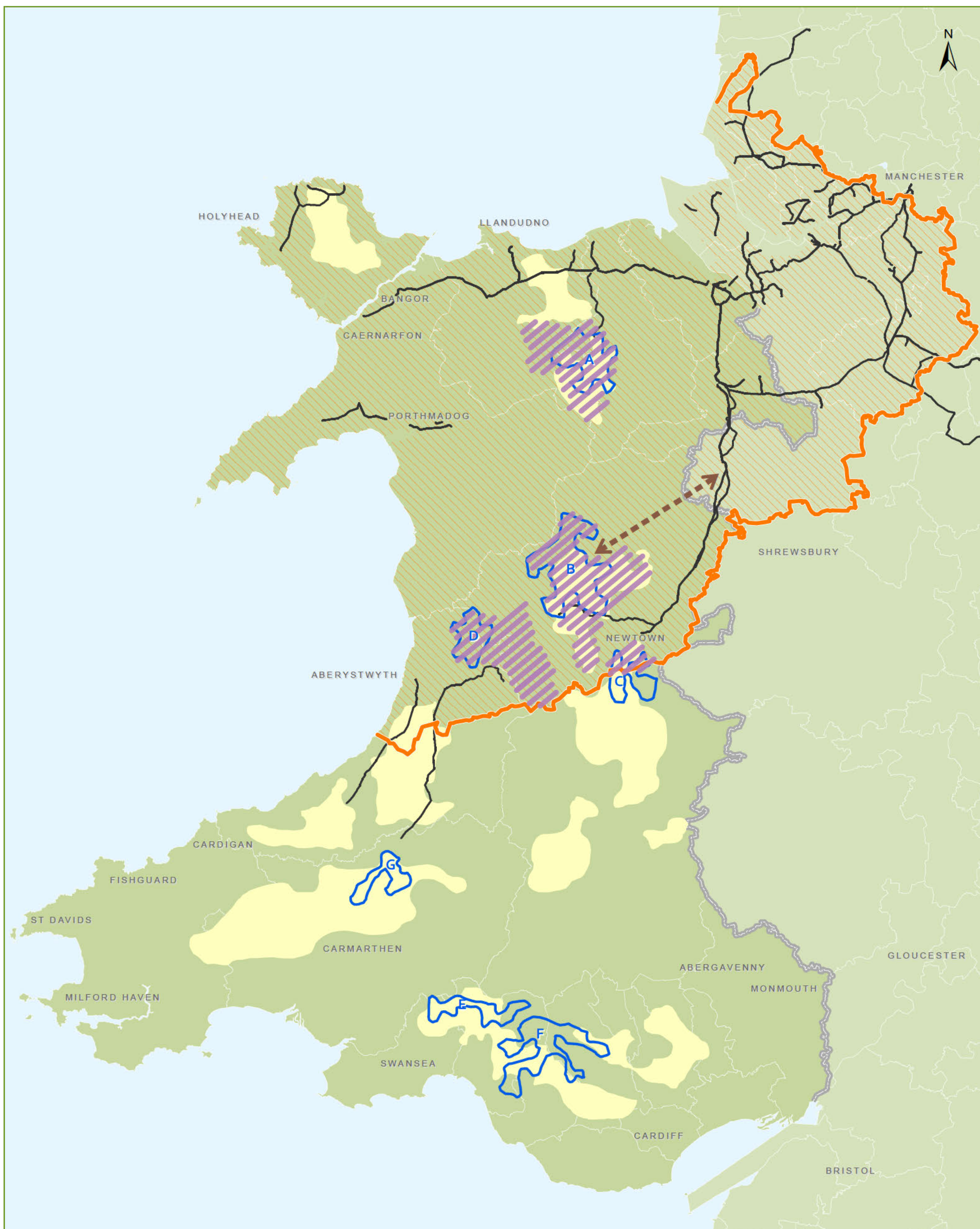
Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	<input type="checkbox"/>
--	--------------------------



- KEY**
- PRIORITY AREA FOR SOLAR AND WIND ENERGY
 - SP MANWEB EXISTING 132 kV OVERHEAD LINES
 - TAN 8 SSA
 - SPM LICENSED AREA
 - ENGLAND WALES BORDER



Plan 1 SP Energy Networks Response to
draft National Development Framework -
Wales Energy Priority Areas Plan
with SPEN 132 kV Network



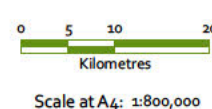
KEY

EXISTING INFORMATION

- PRIORITY AREA FOR SOLAR AND WIND ENERGY
- SP MANWEB EXISTING 132 KV OVERHEAD LINES
- TAN 8 SSA
- SPM LICENSED AREA
- ENGLAND WALES BORDER

SUGGESTED NOTATION

- REVISED PRIORITY AREAS FOR WIND ENERGY
- GRID CONNECTIVITY



Plan 2 SP Energy Networks Response to draft National Development Framework - Wales Revised Energy Priority Areas Plan with SPEN 132 kV Network