

Consultation Response Form

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<u>Organisation (if applicable)</u>	Sirius Planning on behalf of Low Carbon Limited

1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

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

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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:

Low Carbon supports the statements on page 15 which states that *"the NDF, together with Planning Policy Wales, will ensure the planning system nationally, regionally, and locally focusses on delivering a decarbonised and resilient Wales through ... the energy we generate and use ... Wales can become a world leader in renewable energy technologies. Our wind and tidal resources, our potential for solar generation, our support for both large and community scaled projects and our commitment to ensuring the planning system provides a strong lead for renewable energy development mean we are well placed to support the renewable sector, attract new investment and reduce carbon emissions"*.

Low Carbon supports the 11 NDF outcomes, particularly outcome 11 *"A Wales where people live in places which are decarbonised"* and the following statement on page 21 which expands on Outcome 11 *"The challenges of climate change demand urgent action on carbon emissions and the planning system must help Wales lead the way in promoting and delivery a competitive, sustainable decarbonised society..."*. However, it is considered that the approach to the spatial strategy and priority areas for renewable energy is not effective and potentially counter-productive in achieving Outcome 11 (see Question 7 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 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:

Low Carbon do not wish to make any comments in relation to this question.

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?

Low Carbon do not wish to make any comments in relation to this question.

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?

Low Carbon do not wish to make any comments in relation to this question.

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 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?

Low Carbon do not wish to make any comments in relation to this question.

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 type="checkbox"/>

Low Carbon do not wish to make any comments in relation to this question.

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?

Page 36 of the draft National Development Framework sets the target for new renewable energy projects. Low Carbon has some concerns over the requirements for local ownership of renewable energy scheme as per the second and third target. While we are generally supportive of community ownership and are working towards this on some projects that we are currently developing, we are concerned about blanket requirements for local ownership or direct financial contributions into the community (commonly referred to as 'community benefit').

To realise local ownership in such schemes there must be a willingness from local stakeholders to invest into the projects. They must also be prepared to do so at a return that makes the underlying economics of the project sufficiently robust. If the returns required for local ownership are higher than are otherwise attainable within the wider GB market, then successfully bidding into any competitive processes for power purchase agreements / contracts for difference will be difficult as the price bid will naturally have to be higher than those without local ownership requirements. That will limit the route to market for locally owned projects.

A secondary issue is that the inherent uncertainty of long-term project revenues brings into question whether pools of local ownership will be sufficiently sophisticated to value the risks appropriately. If they aren't and power price forecasts fall, the investors will be negatively impacted. Depending on the capital structure of each specific project, a fall could have material impacts on the local ownership investors, especially if they are not diversified across a range of projects. Any advocate of local ownership should be cautious of a backlash by disgruntled investors should those forecasts fall, and it becomes apparent that investors made investments on the back of such advocacy and without fully understanding

the intrinsic risk in doing so.

The viability of local ownership on such developments will therefore vary depending on the nature of the site and the surrounding population, and therefore this target could make renewable schemes unviable and significantly constrain this type of development unnecessarily.

The overarching spatial strategy for renewable energy presented in the draft National Development Framework is for large scale wind and solar development to be directed towards Priority Areas. The draft framework states that 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.

The assessment of large scale (10MW+) on-shore wind and solar energy development constraints and opportunities in Wales was undertaken in two stages to identify the most appropriate locations for such schemes. Stage 1 was a GIS based study focusing on environmental and landscape constraints and Stage 2 looked at further criteria assessment in terms of deliverability and more detailed landscape assessment.

A major factor that now guides solar and wind developments is capacity availability on the distribution network. To maximise efficiency of renewable energy development, schemes should be located as close as possible to the point of connection on the network.

It is understood that data was collected from National Grid, SP Energy Networks and Western Power Distribution for generation headroom and fault level on each of their substations during Stage 2 assessments. This gave an initial indication of the prime locations where grid capacity is currently available.

Low Carbon agrees with the outline approach to identifying areas that have available grid capacity in the Stage 2 assessment – indeed we use similar methodologies in identifying suitable areas where capacity is available. However, we do not agree with the static nature of the methodology. Taking a snap-shot of grid capacity available and then basing strategic level decisions on it to identify Priority Areas is not going to have the desired outcome. Grid capacity across the entire transmission and distribution networks is a dynamic thing. As an example, we revisit our internal analysis regularly to ensure that we are up to date. We commonly find that areas that had viable capacity available are no longer, and conversely some areas where there was no capacity then have capacity come back into the system. We typically see capacity available in the distribution network for no longer than 2 months at any one time before it is taken up by private development.

Assuming that there will continue to be viable grid capacity available within priority areas over the life of the framework will result in failure. It is not a stretch to expect that any available capacity within those areas has now been taken up following the publishing of this consultation document. The need to compete for routes to market mean that no one large scale project will be able to absorb the costs of significant upgrade works so, without some form of government intervention, there will be a natural limit to the deployment of renewables into each of those Priority Areas – and we expect that any available capacity in those areas has already been taken up.

Therefore without government intervention (through, for example, direct funding of reinforcement works and then recouping that from the development that it unlocks, or through creating a market place whereby the costs of reinforcement can be shared pre-investment decision) we believe that creating Priority Areas will materially constrain the deployment of renewables within Wales.

A traffic light-based approach to policies on large scale solar and wind renewable energy projects is proposed in the draft framework. Areas not within the priority areas and outside National Parks and AONB's are within the Amber section, or non-priority areas. The draft NDF states that non-priority areas will not attract explicit Welsh Government support and will be determined on their individual merits.

However, Low Carbon considers that all renewable energy developments should have the Welsh Government's support where it can be demonstrated that there will be no significant adverse environmental impacts. As stated in the Stage 2 Assessment the identified Priority Areas still contain constraints with a number of site-specific issues that cannot be addressed at a national level and not all areas within Priority Areas are suitable for renewable energy generation. The analysis for Priority Areas is a high-level national exercise where local level constraints have not been fully considered. Therefore, Low Carbon contends that all areas outside National Parks and AONBs should have the Welsh Government's support and decisions on such development should be made on a case by case basis. Areas outside National Parks and AONBs should be identified as areas of opportunity for large scale onshore wind and solar development and the policy should consider the merits and benefits of each scheme against any assessed impacts.

It is unclear whether any local planning authority capacity studies on renewable energy and landscape have been considered during the Stage 1 and Stage 2 Assessment in identifying the priority areas. It is considered that local planning authorities' evidence base documents should be examined to ensure that there are no discrepancies for suitable areas for renewable energy between the local and national level. As an example, the Joint Local Development Plan for Anglesey & Gwynedd identifies areas of search for solar which is based on an Assessment of the Potential for Solar PV Farms in Gwynedd and Ynys Môn (2016). It is noted that some areas of search do not fall within the priority areas of the draft NDF. It is also worth noting that parties have moved ahead with long term developments on the basis of local development plans and that if these were subsequently overridden by a national framework, it would materially impact on those parties that had moved ahead in good faith on the basis of those local development plans.

Policy 10 concerns wind and solar energy development in the identified Priority Areas stating there is a presumption in favour of such schemes and that *"When determining planning applications for large scale on-shore wind and solar energy development in Priority Area, significant weight will be given to the proposal's contribution to reducing Wales's greenhouse gas emissions and meeting our decarbonisation and renewable energy targets"*.

Low Carbon considers this should also be the case for developments outside Priority Areas and therefore Policy 11 should reference that *"significant weight will be given to the proposal's contribution to reducing Wales's greenhouse gas emissions and meeting our decarbonisation and renewable energy targets"*. This would be in line with Planning Policy Wales which makes specific reference to renewable energy generation in that *"the benefits of renewable and low carbon energy, as part of the overall commitment to tackle climate change and increase energy security, is of paramount importance. The continued extraction of fossil fuels will hinder progress towards achieving overall commitments to tackling climate change. The planning system should, maximise renewable and low carbon energy generation"*.

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 checked="" 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.

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 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 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.

Low Carbon supports Policy 22 'North West Wales and Energy' particularly the statement that "*the Welsh Government supports North West Wales as a location for new energy development and investment*". However, there is no reference to renewable energy within the policy text. Low Carbon consider this a missed opportunity given that the supporting text for the policy confirms that the region has a strong potential for generating wind, solar and tidal energy.

It is supportive that The Anglesey 'Energy Island' Programme is mentioned in the accompanying text for Policy 22. The Isle of Anglesey County Council's Energy Island Legacy Framework (2017) states that a number and variety of proposed major projects are looking to capitalise upon a wide range of low carbon energy sources providing significant opportunities to deliver tangible economic, social and environmental benefits. It is therefore considered that the National Development Framework should support the designated energy island for renewable energy developments.

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.

Low Carbon do not wish to make any comments in relation to this question.

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?

Low Carbon do not wish to make any comments in relation to this question.

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?

Low Carbon do not wish to make any comments in relation to this question.

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.

Low Carbon do not wish to make any comments in relation to this question.

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 checked="" type="checkbox"/>
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