

# Draft National Development Framework

## 1. NDF Outcomes (chapter 3)

Q1. 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?

Don't know

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Don't know

## 2. Spatial Strategy (policies 1 - 4)

Q3. 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	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)						X	
Rural areas (Policy 4)						X	

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

*No Response*

## 3. Affordable Housing (policy 5)

Q5. 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?

Don't know

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

*No Response*

## 4. Mobile Action Zones (policy 6)

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Don't know

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

*No Response*

## 5. Low Emission Vehicles (policy 7)

Q9. 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?

Don't know

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

*No Response*

## 6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly disagree

## 7. Renewable Energy and District Heat Networks (policies 10-15)

Q12. 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	Don't know	No opinion
Large scale wind and solar developments					X		
District heat networks						X	

Q13. 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?

Unfortunately, the proposed Priority Areas for Wind and Solar Energy are totally insufficient to achieve the stated target of 70 per cent of electricity consumption to be generated from renewable energy by 2030. The proposed "traffic light" based approach will not support any significant growth in new onshore renewable energy development over and above a business-as-usual scenario. Indeed, given the extensive caveats accompanying the stated "presumption in favour of development for these schemes and an associated acceptance of landscape change" within the proposed Priority Areas, we fail to see how Policy 10 meaningfully alters the status quo regarding planning permission for new onshore renewables development.

Meanwhile, the Framework seems to present new obstacles to development outside of these inadequate Priority Areas, most notably with regard to "unacceptable adverse effects on, or due to . . . landscape or visual impacts"- This is an ill-defined and totally subjective criterion which could in theory jeopardise any and all new onshore renewable energy development.

Solar parks are a temporary and, in the vast majority of cases, a completely reversible land use. For almost all ground-mount solar installations, panels are set on posts and there is minimal disturbance to the ground (typically less than 5%). The remainder of a field utilised for solar park development is still accessible for plant growth and potentially for wildlife enhancements and complementary agricultural activities such as conservation grazing of sheep. Solar parks are secure and long-term installations (with 25-40-year operational lifespans), requiring minimal human disturbance of the grounds, and with a very small infrastructure footprint – all attributes that engender them as good areas to enhance the ecological value of the landscape. Indeed, a number of our members have reported that threatened and endangered species regularly make use of their large-scale solar sites as habitat. For more information, we would encourage PKC to view our recent report on the Natural Capital Value of Solar, case studies in which describe the natural and constructed habitat enhancement activities our members are undertaking at their solar sites. We are confident that, if designed, constructed and maintained properly, large-scale solar developments have a net positive impact on the natural capital value of the landscape in question, and support a wide range of ancillary community benefits.

A solar park can only be developed under extremely specific circumstances, particularly in the current era of zero subsidy support for new onshore renewables requires both a sufficient land area (either brownfield or low-value agricultural land) and an affordable connection to the electricity network. From both an economic and decarbonisation standpoint, it is also greatly advantageous to have a solar development located as near as possible to where the output will be consumed, so as to minimise grid losses. By identifying Priority Areas which are a considerable distance from connection points, the draft NDF has limited opportunities for solar development across Wales.

Given the locational specificity of these circumstances, an All-Wales assessment of landscape impact is not appropriate for identifying suitable sites for solar development (or unsuitable areas to be excluded) and site-specific assessments are the only reliable approach.

A number of our members are actively exploring opportunities to develop new solar and onshore wind generation capacity outside of these proposed Priority Areas. For example, Greater Newport, with its comparatively robust solar resource, high levels of electricity demand, and availability of suitably low-value brownfield areas, would be an ideal candidate for new solar park development. However, it appears to have been totally excluded from the Priority Areas.

We would also note that the NDF document also does not appear to reflect the enormous potential of onshore renewable energy development to drive local economic growth and create employment opportunities, in comparison to alternative land use options. Studies on jobs intensity produce varied conclusions, as documented in this UK Energy Research Council literature review (2014), but consistently assess solar PV as having the highest labour requirement compared to equivalent energy generation from all other technologies. One widely-cited US study found that a \$1 million investment in new energy development created 17 jobs in clean energy compared to 5 jobs for fossil fuels, and a World Bank analysis concluding every \$1 million spent creates 13.5 jobs in wind and solar and 5.2 jobs oil and gas.

Our recommendations are as follows:

- That policies 10, 11 and 13 be merged such that there is a presumption in favour of all renewable energy technologies throughout Wales and an acceptance of landscape change except in the areas identified in policy 12, and that in lieu of the proposed Priority Areas/Traffic Light approach, all future development of onshore wind and solar generation capacity be evaluated on a case-by-case basis
- That the NDF adopts a policy to support reinforcement of the electricity network to enable the required expansion of renewable energy developments

## 8. The Regions (policy 16)

Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale? 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.

Don't know

## 9. North Wales (policies 17-22)

Q15. 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?

Don't know

## 10. Mid and South West Wales (policies 23-26)

Q16. 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?

Don't know

## 11. South East Wales (policies 27-33)

Q17. 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?

Don't know

Q18. 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.

*No Response*

## 12. Integrated Sustainability Appraisal

Q19. 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.

*No Response*

## 13. Habitats Regulations Assessment

Q20. 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?

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## 14. Welsh Language

Q21. 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 Response*

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: 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 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 Response*

## 15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

*No Response*

## 16. Are you...?

Q24. Are you:

Submitting a response on behalf of an organisation

## Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

<b>Name</b>	Nicholas Gall
<b>Organisation (if applicable)</b>	Solar Trade Association
<b>Preferred contact details (email/phone/post)</b>	████████████████████

Q26. If you want to receive a receipt of your response, please provide an email address.  
Email address

████████████████████

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

*No Response*