



Welsh Government
Consultation Document

National Development Framework

Representations on behalf of Western Power Distribution (South Wales)



Date of issue: 7 August 2019
Action required: Responses by 15 November 2019

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Consultation Response Form

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Organisation (if applicable)	Western Power Distribution (South Wales)

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

- If you disagree with any of the 11 Outcomes, please tell us why:

No comments.

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	Don't know	No opinion
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 checked="" 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 checked="" type="checkbox"/>

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

Development in urban and rural areas, as proposed in the spatial strategy, will require increasingly larger and more complex electricity distribution networks if Wales is to meet its aspirational target to be net zero by 2050. New and improved networks will be required to meet the demand for electric vehicle charging, the electrification of heat (both domestic and commercial) and also for connecting generation.

It is essential that the planning system in Wales recognises the challenges that this will give rise to and the need to ensure that there is both flexibility and support in the planning system to accommodate the new network and associated development, including increased substation sizes.

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

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

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

No comments.

4. Mobile Action Zones (policy 6)

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

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

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

No comments.

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 checked="" 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?

Policy 7 concerns ultra low emission vehicles and references working with the energy sector to plan for, and implement, the roll out of electric vehicle charging infrastructure, including the creation of a network of rapid charging points.

This infrastructure will place new challenges for the electricity distribution network in order for it to achieve the levels envisaged. WPD through its innovation team is working on network improvements and new technologies to realise this future demand but it must be fully supported through the planning system as it will require new and different substations and other infrastructure that is not currently common place.

There will be a need to introduce and trial new technologies and equipment to meet demand, for example 3-phase services in new housing, currently supported by WAG funding, and the trial of retro-fit service upgrades. In doing so it is essential that the planning system provides the support and flexibility to enable the installation of larger substations in both urban and rural areas to meet the increased demand for electricity that will arise from different sources including electric vehicles. This will be a particular challenge for urban areas where larger substations beyond the usual permitted development sizes will increasingly be required. It is essential that the planning system in Wales recognises the need for such infrastructure and that local planning authorities and Welsh Government support the delivery of such projects.

6. Green Infrastructure (policies 8 & 9)

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

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

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

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- If you disagree 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?

For renewable energy technologies the NDF states that there is a commitment to ensuring that the planning system provides a strong lead for renewable energy development. (NDF p.15) This must also extend to the electricity distribution network that will most often be the point of connection for new generation. It remains the case that often sites suitable for generating renewable energy will be remote from sections of the network that have the capacity to accept large amounts of electricity generation.

In these cases it may be necessary to construct new overhead networks with the capacity to export large quantities of electricity. WPD is engaged in discussion with the north Wales DNO, SPEN and WAG, on the potential for generation in mid Wales which is generally poorly served with network and the desirability of a National Grid connection in this area. It is also the case a number of the energy priority areas are identified are in areas where the network is already at capacity and additional network infrastructure will need to be constructed.

It is important that the planning system recognises this and the distinction between the generating stations and the electricity network as a separate entity, normally with a statutory duty to provide a connection. Such new network may qualify as a nationally significant infrastructure project requiring a development consent order, such as WPD's Brechfa Forest Wind Farm Connection, or it may be a Development of National Significance. It is essential that the planning system in Wales recognises the need for such infrastructure and that local planning authorities and Welsh Government provide in-principle support for the delivery of such projects.

8. The Regions (policy 16)

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

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

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

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

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

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

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

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

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

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

The WPD DSO Shaping Subtransmission report for Wales sets out the strategic reinforcement that is expected in each area into the 2030s and includes the distribution future energy scenarios for south Wales. It is important for WPD and Welsh Government to continue to work together to ensure that these forecasts are accurate and reflect the planned and approved growth strategy. WPD will always be available to discuss these scenarios and encourages engagement.

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.

No comments.

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?

No comments.

14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No comments.

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

- I. positive effects or increased positive effects on opportunities for people to use

the Welsh language and on treating the Welsh language no less favourably than the English language, and

- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No comments.

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?

Western Power Distribution (WPD) supports Welsh Government's outcomes as established by the National Development Framework and in particular its recognition that current patterns of development and the infrastructure which supports it will need to change and adapt significantly in the future. As the distribution network operator for the south of Wales, WPD is presently expanding its current role as distribution network operator ("DNO") in to that of a distribution systems operator ("DSO"). This is in recognition of the changes which currently face the generation and supply of electricity and the challenges which are already emerging in terms of increased demand both for generation and supply.

The draft framework identifies the necessity of low carbon generation and WPD is aware of Government's ambition to achieve net zero carbon emissions by 2050. WPD is committed to supporting Wales' transition to a carbon free economy but would suggest that the steps to be taken to achieve such a change need to be set out and explained clearly within the document. The policy framework should in the opinion of WPD be more supportive and accommodating of the way in which both business and society will operate in the future. The changes required to achieve this to the electricity distribution network will be fundamental and it is essential that the planning system will support them.

With regard to the challenges facing WPD it is recognised that specific policy has been prepared for the consideration of renewable energy developments, to provide encouragement for ultra-low emission vehicles and in support of urban growth, urban centres and rural towns and areas. The role that technology has to play must not be underestimated and the need to provide for enhanced data and telecoms infrastructure will be critical. WPD is investing by expanding its operational telecom infrastructure to support the network now and into the future. In addition WPD is moving into innovative connection agreements with customers to manage supply and demand, as well as new grid technologies. In each instance and for all development types WPD would ask that the necessary development associated with such projects, namely the grid connection, telecommunications substations and sub-station extensions receive explicit and 'in-principle' policy support. Without consent for the generation and supply of electricity the outcomes established by the Framework may be difficult to achieve.

There are two ways in which policy support for new and improved grid infrastructure could be provided. The first is to mirror the approach which the document takes to the requirement for additional and improved mobile telecommunication infrastructure whereby Policy 6 includes reference to ‘considerable weight’ and ‘presumption in favour’. Alternatively, reference could be made in policy wording and/or supporting text to policies 1, 2, 4, 7, 10 and 11 such that there is an explicit acceptance of the need for supporting grid infrastructure and a presumption in favour of its development subject to certain criteria. WPD considers either approach to be valid and particularly important given that the Development Framework will become a key document in the consideration of applications for developments of national significance. Presently the framework is silent on many categories of electricity network infrastructure including 132kV above ground connections.

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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