

Agenda – Climate Change, Environment and Rural Affairs Committee

Meeting Venue:

Committee Room 3 – Senedd

Meeting date: 14 November 2019

Meeting time: 09.00

For further information contact:

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Committee Clerk

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1 Introductions, apologies, substitutions and declarations of interest

(09.00)

2 Draft National Development Framework 2020–2040 – evidence session 5 – Energy

(09.00–10.00)

(Pages 1 – 26)

Will Ryan, Director, Planning – Savills

Rhys Wyn Jones, Head – Renewable UK Cymru

Eleri Davies, Head of Consents UK – Innogy Renewables UK Ltd

Attached Documents:

Research brief

Paper – Savills

Paper – Renewable UK

Paper – Innogy Renewables UK



3 Draft National Development Framework 2020–2040 – evidence session 6 – Biodiversity

(10.00–11.00)

(Pages 27 – 30)

James Byrne, Living Landscapes Manager – Wildlife Trusts Wales

Anthony Geddes, National Manager for Wales – Confor

Jerry Langford, Public Affairs Manager – Woodland Trust

Mike Wilkinson, Senior Conservation Planner– RSPB Cymru

Attached Documents:

Paper – RSPB Cymru

4 Motion under Standing Order 17.42 (vi) to resolve to exclude the public for the remainder of the meeting

BREAK 11.00–11.10

5 Draft National Development Framework 2020–2040 – Briefing – PRIVATE

(11.10–12.15)

Graeme Purves, Expert Adviser to the Committee

6 Consideration of Committee's approach to the Fuel Poverty Inquiry – PRIVATE

(12.15–12.30)

(Pages 31 – 35)

Attached Documents:

Paper

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Introduction

Savills is the UK's leading property and planning consultancy and represents clients in the public and private sectors throughout Wales. We are involved in advising on many of the most significant development projects in Wales and our expertise in all areas of land use allows us to combine sector-leading expertise with detailed local knowledge to identify solutions to the most complex and challenging planning projects.

Savills is grateful for the opportunity to give evidence to the Committee and the following represents a summary of the consideration of the draft National development Framework. The responses align with the questions set out in the Consultation Response Form.

1. NDF Outcomes

Savills considers that the NDF Outcomes included within Section 3 of the draft document are generally achievable, if a little unambitious.

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 or external relationships and opportunities. These relationships are significant in terms of the general sustainability of the Wales economy and environment.

There is a notable absence of substantive economic purpose to the Framework as a whole and the Outcomes specifically, to the extent that an opportunity to implement a sustainable Framework and to achieve a sustainable Wales in its overarching context has been missed in the draft document.

Furthermore, and seemingly key to the delivery of an effective long-term national framework, is the absence of a clear infrastructure strategy: what infrastructure projects are considered to be core requirements, where these should be located and how they are to be delivered. It is proposed that these should be identified since they hold the key to unlocking a host of other development opportunities. 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.

2. Spatial Strategy

The draft NDF directs significant new development to key locations – an approach that generally reflects how planning for growth has been carried out in Wales. However, the number of locations is limited and the explanation of what this means and how it will be applied is brief.

The discouragement of alternative options, in particular of greenfield development is over prescriptive and is in danger of not facilitating schemes that might benefit from existing services or recognising the potential that the delivery of these services might be enabled by large scale new development.

Further explanation of the national and regional growth areas would be beneficial. There is very little information on what they mean, what or how projects will be prioritised within them and how they will inform the preparation of SDPs.

3. Affordable Housing

The draft NDF expects a much more significant number of affordable homes to come from the public sector almost immediately and there are clear practical difficulties in achieving this. This is accompanied by a lower contribution (than is currently being delivered) of other housing from the private sector. We doubt whether it is the intention of the NDF to suppress current performance but this is a realistic scenario based on proposed expectations.

The NDF relies on referring to percentages of affordable housing. The concern is that the high levels described in the section on housing (and in the regional sections as well) will be used as targets in future development plan documents, including the forthcoming Strategic Development Plans (SDPs). If delivery by new methods or new sources fails then targets will potentially make new housing schemes unviable. The reasons for this are well rehearsed and broadly understood and accepted by planners in the public and private sectors.

4. Green Infrastructure

No information is given even indicatively or on any spatial diagram or plan as to the location or extent of the Forest and caution must be given to the presence of existing resources and available sites in determining its extent and location(s).

6. Renewable Energy & District heat Networks

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.

The omission of substantive reference to the grid issues is an 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 renewable and low-carbon schemes throughout Wales. The relationship of energy generation and of distribution via the National Grid in a UK context must also be recognised and considered as part of the NDF.

In more general energy terms, the sentiment of target setting is generally supported although there is no information in terms of practical delivery of WG targets. There is no tie in with other WG 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 local-owned generation schemes although there is very little commentary in terms of what locally owned looks like in practice.

The draft NDF therefore needs to be clear that there is an established, and urgent, need in Wales for a significant increase in development of low carbon energy generation projects 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.

7. The Regions

The Spatial Strategy is founded on the identification of just three regions within Wales. There is little or no explanation of this approach and compares with the current Wales Spatial Plan (which the NDF will replace) that identifies six spatial areas and also with Welsh Government research for the NDF that was carried out by Cardiff University and which recommends four regions. The definition of the regions is crude and does not necessarily reflect the geography, context, opportunity and challenges that need to be addressed within Wales to inform the Spatial Strategy.

8. North Wales

The housing figures for North Wales are significantly lower than recently planned provision. The NDF allocates 19% of homes throughout the duration of the NDF to North Wales which equates to 19,400 homes over a 20 year period. This figure equates to an annual housing need of just 917 homes per annum compared to the combined figure for the current LDP network across the identified North Wales region (noting that Flintshire and Wrexham are deposit plans and their figures may be subject to change) of 2376. The NDF housing figure for North Wales is therefore 59% lower than that currently anticipated, 47% of which are allocated as affordable housing.

The imposition of a Greenbelt located to the north-east of Wrexham requires further consideration. The use of greenbelt is increasingly considered to be a concept that imposes a restrictive approach to planning policy that has the potential to stagnate the housing market

and too blunt and negative an instrument. It is also noted on the strategic regional diagram that the National Growth Area overlaps the Greenbelt for the north east of Wales and it is difficult to see how the two concepts can be merged.

Rather than a Greenbelt, it is proposed that areas of significant green infrastructure, potentially incorporating areas identified for the National Forest (Policy 9) is likely to be a much more useful and constructive approach to “conserving” countryside by placing it in a functional setting rather than a restrictive context.

The absence of any meaningful infrastructure proposals within the NDF for the North Wales region is also recognised and there are a number of potential schemes that should be referenced, including the Third Menai Crossing and improvements to the A55.

Finally, and consistently across the regions, the absence of substantive economic strategy is of significant concern.

9. Mid & South West Wales

With regards to the Mid & South West Wales region there is recognition within the text that there is significant regional variation within the identified area and that effectively it will be treated in two sub-regions. It is not clear whether there would be a single SDP or more.

The housing figures are significantly lower than recently planned provision. The NDF need of 23,400 homes over the 20 year period gives an annual figure of 1,170 homes. The combined annual figures from just Swansea, Neath Port Talbot and Carmarthenshire’s current adopted LDPs is 2,450. The NDF proposal is less than 50% of this figure with one half of the homes to be provided by affordable housing.

In addition to the absence of substantive economic policies, there are a number of key projects that might be identified as being forthcoming over the NDF period including city and town regeneration projects, road and rail improvements and grid upgrades.

The absence of development opportunities and growth areas throughout mid-Wales effectively from the M4/A48 through to Welshpool is of concern and is not helpful in terms of growth in a sustainable manner of Mid & South West Wales.

10. South East Wales

The proposed strategy for South East Wales is inconsistent – it purports to support string growth but does not demonstrate how this can be delivered across sectors. The strong encouragement for growth across the region is contradicted by:

- A significant reduction (almost 50%) in the quantum of housing. The NDF requirement divided equally gives an annual figure of 3,650 dwellings per

annum. The current round of LDPs proposes an annual target of 6,832 per annum. 48% of this reduced commitment is expected to come from affordable housing;

- The limited number of identified growth locations. The WSP listed 14, the NDF has just six. The Wales Spatial Plan identified and described three strategic growth areas, the NDF has a vague wash-over National Growth Area which is unclear in intention, effect and is undefined;
- The imposition of the greenbelt, the overall thrust of which might be better achieved in identifying areas of significant green infrastructure;
- The virtual silence on economic growth or priority sectors and the absence of any substantive policies on these issues;
- The absence of any infrastructure policies which, in an area, of major infrastructure underinvestment is particularly significant. A number of transport and energy schemes should be identified including the desperate need for enhancements to the M4.

15. Other Comments

There are a number of sectors that are briefly referenced within the Overview and Outcome sections of the NDF and are fundamental to a successful and sustainable Wales but are not reflected within the draft NDF. These include waste infrastructure, the maintenance and development of mineral resources and the education (and associated Research & Development) sector. The NDF offers an excellent opportunity to promote and develop these sectors in alignment with other development opportunities.

31st October 2019.

November 2019

RenewableUK Cymru statement to Climate Change, Environment and Rural affairs committee regarding the draft National Development Framework 2020-2040

Introduction

Renewable UK Cymru (RUKC) is part of Renewable UK and is responsible for facilitating a renewable energy policy environment in which its members can operate, helping them grow their businesses and providing influencing and networking opportunities.

RUKC is grateful to the National Assembly for Wales climate change, environment and rural affairs committee for providing this opportunity to contribute to the scrutiny of the National Development Framework (NDF). RUKC has restricted its comments to the development of large scale wind and solar renewable energy and other renewable energy projects i.e. NDF policies 10-13.

1. RUKC statement regarding the NDF's scope and ambition

1.1 Wales finds itself in a different political, environmental and societal situation to that which provided the context to the targets it set for the delivery and ownership of renewable energy in 2017¹.

1.2 The NDF is a generation defining opportunity to put in place a new planning framework that can unlock Wales' potential to meet the challenges of the declared climate emergency.

1.3 RUKC broadly welcomes the Welsh Government's positive approach to renewables and the efforts made to reflect this in the narrative and policies of the NDF, summarised as follows²:

"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."

1.4 RUKC appreciates there are continuing limitations on Welsh Government's ability to develop and manage a holistic approach to the decarbonising agenda while it still does not have full control over matters such as electricity transmission and The Crown Estate's leasing regime for the development of marine energy. However, the inter-relatedness of the UK energy system was evident during the recent Low Frequency Demand Disconnection event on August 9th, 2019 where many thousands of Welsh customers were temporarily impacted.

1.5 This supports RUKC's position that the NDF must not be 'silent' on the support required for other renewable energy development and how these technologies potentially contribute to a resilient and secure energy system. This includes reference to offshore wind (and onshore infrastructure associated with offshore wind development) and energy development that will facilitate renewable energy, e.g. pumped hydro.

¹ P.3 Electricity generation in Wales 2017, Welsh Government

² P.21, National Development Framework 2020-2040

1.6 Neither does the NDF provide a solid decision-making framework for any other type of non-energy related DNS e.g. airport-related development, railways, highways.

1.7 RUKC is cognisant of the challenge of designing policy which accommodates a significant degree of economic and political unpredictability both in the immediate future and over the longer term. As noted in the First Minister's Foreword, "It is difficult to imagine how the world might look in 2040"³

1.8 RUKC believes Welsh Government should articulate a clear direction of travel as regards Wales' future position as a net power exporter within the context of the NDF. This should include its analysis of how decarbonising heat and transport is likely to impact demand for renewable electricity. With an increased policy emphasis on local benefit, Wales stands to benefit from an increase in locally generated renewable electricity, however the policy position on the export of electricity from renewables remains unclear.

1.9 RUKC believes the consultation document would also have benefitted from providing some insight into Welsh Government's view of the future interaction between expected increased demand arising from the decarbonisation of heating and transport, the need for complementary renewable energy technologies and the need to upgrade the electricity transmission and distribution networks in and between Wales' regions. RUKC suggests that the NDF should acknowledge the likely need for improved grid infrastructure to deliver future decarbonisation.

1.10 Furthermore, the NDF takes little account of the huge challenge to decarbonise heat beyond the establishment of District Heat Networks and to offer support "wherever they are viable"⁴. More consideration could have been given to a decarbonisation roadmap where the electrification of heating and transport and re-purposing of the gas distribution network may both need to play strategic roles in delivering a 'street by street' solution to decarbonisation.

1.11 In summary, RUKC believes the NDF lacks a unifying strategic vision for Wales' future energy system. A greater balance could have been achieved between proposing specific policy approaches for specific technologies and offering a more coherent view of how the energy system will need to accommodate decarbonising heat and transport.

2. RUKC statement on the NDF's policy proposals for Renewable Energy

2.1 RUKC recognises that the ambition and scope of the NDF represents a step change from the outgoing Technical Advice Note 8 'Planning for Renewables Energy' (July 2005) (TAN8). TAN8 restricted opportunities for developing projects >25MW largely to the Strategic Search Areas (SSAs) and provided limited opportunities for 5-25MW projects, whereas the NDF envisages consideration of large scale renewable energy projects (>10MW) in all areas outside those which have special designations. RUKC welcomes this.

2.2 RUKC believes that the policy wording outlined in policy 10 should be applicable to all areas outside NPs and AONBs (i.e. those currently defined as the 'red' areas within Welsh Government's proposed 'traffic light' approach)⁵, with the application of an appropriate criteria based approach. RUKC analysis indicates that a significant proportion, if not the majority of development will have to come from areas outside the currently defined Preferred Areas.

2.3 RUKC does not advocate 'carte blanche' for development. It is highly unlikely that any developer would seek to establish a project in areas carrying, for example, Site of Special Scientific Interest (**SSSI**), Special Area of Conservation (**SAC**) or Special Protection Area (**SPA**) designations. Rather, RUKC

³ P.4 National Development Framework 2020-2040

⁴ NDF, P.43

⁵ NDF. P.37

favours a sensible criteria-based policy whose *ethos* carries a presumption in favour of landscape change in areas outside those with special designations. This would seem more aligned with the step change required to meet the challenge of the declared climate emergency and net zero ambition. It is also the approach implied by Planning Policy Wales⁶:

“Planning authorities should give significant weight to the Welsh Government’s targets to increase renewable and low carbon energy generation, as part of our overall approach to tackling climate change and increasing energy security. In circumstances where protected landscape, biodiversity and historical designations and buildings are considered in the decision making process, only the direct irreversible impacts on statutorily protected sites and buildings and their settings (where appropriate) should be considered. In all cases, considerable weight should be attached to the need to produce more energy from renewable and low carbon sources, in order for Wales to meet its carbon and renewable targets.”

2.4 RUKC has consistently advocated that ‘lines on maps’ should not form the basis of subsequent iterations of planning policy following TAN8. The SSA model in TAN8 engendered considerable ill-will within local communities and host authorities for whom landscape change, both in terms of renewable energy projects and their associated grid connections, were viewed as a ‘fait accompli’, fuelling already implacable opposition to renewable energy (onshore wind) development. It is regrettable therefore that industry views relating to the proposed ‘priority areas’ model do not appear to have been considered.

3. RUKC statement on the proposed priority areas for renewable energy development.

3.1 RUKC conducted a mapping exercise to establish the likely developable opportunity (% of unconstrained area) of the 11 priority areas identified as ‘wind only’ priority areas. (i.e. it excluded priority areas 2, 4, 12 and 13 which are designated as ‘solar only’ priority areas).

3.2 RUKC has engaged with colleagues in the solar renewable energy sector and the Solar Trade Association (STA). Its understanding is that the STA will engage with the NDF and provide its view independently.

3.3 According to RUKC’s analysis, the total area of developable (unconstrained) opportunity for the 11 priority areas which relate to onshore wind equates to approximately 5%. In these areas, it is likely that the vast majority of developable opportunities would relate to sites of less than 10MW capacity, and therefore not within the NDF’s remit.

3.4 A further mapping exercise is being undertaken by RUKC applying a criteria based approach to developing onshore wind projects (as opposed to the ‘priority area’ approach). The purpose is to establish the extent to which this approach would deliver a greater area of developable opportunity and commensurate uplift in potential capacity for onshore wind.

3.5 N.B. RUKC’s detailed analysis of the priority areas and results from its mapping exercises, including the constraints/criteria it has applied in order to generate its results, will be submitted as part of its formal consultation response to Welsh Government.

⁶ Planning Policy Wales(v.10) Section 5.9.17

3.6 For both exercises, it will be important to note that the indicative potential developable capacity (MWs) within an area is unlikely to ensue i.e. achieving a particular level of MW capacity within an area would likely require a far higher *potentially* developable capacity.

3.7 It is therefore RUKC's view that the priority areas as drafted are highly unlikely to be fit for purpose either in relation to the ambition set out in outcome 11 of the NDF (**see above 1.3**) or in the context of the UK Committee on Climate Change's view of meeting the netzero challenge:

“Renewable generation could be four times today's levels, requiring a sustained and increased build out between now and 2050, complemented by firm low-carbon power options such as nuclear power and carbon capture and storage (applied to biomass or gas-fired plants)”⁷

⁷ UK Committee on Climate Change (May 2019) Net Zero: The UK's contribution to stopping global warming

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RSPB Paper to Climate Change Environment and Rural Affairs Committee Scrutiny of the Welsh Government's Draft National Development Framework

1. NDF ambition and outcomes

- 1.1. The recognition that climate change and biodiversity decline are the biggest issues facing our nation is a powerful statement of purpose. We welcome the ambition set out in the overview and outcomes of the NDF to address climate change and reverse biodiversity decline. The 2020-40 timeframe of NDF is one that requires transformational change to address the twin crises of biodiversity collapse and climate emergency.
- 1.2. There are significant gaps however in how these ambitions have been translated across the outcomes and policies.
- 1.3. The proposed NDF policy for a strategic framework for biodiversity enhancement is a positive step but falls short in not making it obligatory that development contributes to nature recovery. Policies for nationally important sites and priority species are absent and must be included.
- 1.4. The renewable energy policies require significant re-drafting to ensure biodiversity is given proper weight.
- 1.5. Policies such as those for airport and port expansion need to explain how they can be compatible with Wales's climate and biodiversity outcomes and the policies need to more systematically address key challenges for de-carbonisation such as renewable heating. There needs to be more join up between the policies in the NDF and Welsh Government's Carbon Budgets and Investment plans to focus on the twin goals of de-carbonisation and biodiversity decline.
- 1.6. There is a disconnect in the way climate change is embedded. For example, the climate change outcome refers to energy, transport, health and jobs but not to housing; while the outcome for homes and housing makes no reference climate change and the types of buildings that we need to build – i.e. low or zero carbon – to get to net zero.

2. Overall approach

- 2.1. The NDF should be read in parallel with Planning Policy Wales (PPW). However, both contain 'all Wales' policies and there needs to be a clearer rationale across both for which policies should be in the NDF and which are only covered in PPW.
- 2.2. In our view there are significant gaps in the NDF including **the absence of policies for nationally important landscape and biodiversity assets** which are found in PPW but not in the NDF. The NDF is the top tier development plan and carries greater legal weight than PPW and should include policies for these spatially defined designations.
- 2.3. Overall the NDF approach to spatial strategy looks somewhat unbalanced. Spatial policies such as those for ports are very brief and high level whereas those for renewable energy are very detailed. The two renewable energy policies read much more like

- development management policies (with criteria against which to test development) than the rest of the NDF.
- 2.4. Planning Policy Wales sets out a framework for implementing the biodiversity duty set out in Section 6 of the Environment (Wales) Act and building resilience through the planning system. This should apply to local plans and to the NDF. The Environment Act should be given more prominence in the evidence base, outcomes and policies of the NDF.
 - 2.5. A Habitat Regulations Assessment was undertaken of the effect of the NDF on Wales's Natura 2000 sites – these are sites that are internationally designated for biodiversity. For 20 of the NDF policies the assessment set out mitigation measures to avoid adverse effects on Natura 2000 sites. **The NDF needs to be clearer about what projects and lower tier plans must do in terms of adopting the mitigation measures set out in the HRA.** For example, the HRA concluded that further studies were needed for the Port of Holyhead policy (20) and 'would certainly provide essential context for this policy before it can be implemented in any way'. It is unclear how Welsh Government has taken this conclusion into account as there is no reference to these findings in the NDF policy.
 - 2.6. The NDF should give more consideration to its role as a policy framework for Developments of National Significance which are mentioned only once in the document.
 - 2.7. We see a case for Regional Development Plans (policy 16) which could be used to identify and implement ecological networks and net biodiversity gain across administrative boundaries. However, more consideration needs to be given to defining regions that 'work' in terms of place making, local communities and ecosystems to deliver across the Wellbeing and Environment Act objectives.

3. Nature's Recovery

- 3.1. We welcome the NDF Outcome that commits to reversing biodiversity decline.
- 3.2. Policy 8 aims to establish a strategic framework for biodiversity and ecosystem resilience through *future* action to identify and safeguard areas of potential importance for habitat restoration or creation. We welcome the intent and ambition of this policy as a positive step but believe that it needs to be strengthened through the following measures.
- 3.3. **A clear commitment to achieving net biodiversity benefit** should be written into the policy so that development must positively contribute to nature recovery. As written, the NDF policy is weaker than and inconsistent with Planning Policy Wales. The issue here is setting out an expectation that development must contribute to reversing biodiversity decline. A strong NDF policy is needed in Wales given that in England the Government intend mandating that developers deliver net biodiversity gain.
- 3.4. **Priority species must be explicitly included in the policy** – currently the focus of the draft policy is on habitats (however, Welsh Ministers must take steps to maintain and enhance priority species that are listed in Section 7 of the Environment (Wales) Act). As an example, curlew is one of our most threatened and iconic birds and could be lost from Wales in the next 20 years – the period covered by the NDF. The national ecological network referred to in the policy must explicitly encompass the needs of priority species such as curlew.
- 3.5. There should be a clear **reference to Developments of National Significance (which are determined by Welsh Government) and the need for them to contribute to nature recovery.** The NDF is an opportunity for Welsh Government to set this out as a clear expectation so that developers know that they must address biodiversity benefit when

- bringing forward Developments of National Significance. The detailed implementation could be addressed through future guidance.
- 3.6. **A clearer route to translate policy 8 into credible and timely implementation.** The policy in part relies on the Area Statements process to identify areas for habitat creation and enhancement. The Welsh Government and NRW need to review whether Area Statements are scoped and on track to deliver this.
 - 3.7. **A commitment to identify areas of national significance for biodiversity enhancement.** There is a role for the national spatial plan to identify national spatial priorities for enhancement, but it is not clear that these will emerge from the locally based Area Statements process.
 - 3.8. The policy needs to explicitly **include the role of ecological networks in supporting Natura 2000 sites** as the policy is cited as mitigation in the Habitat Regulations Assessment.
 - 3.9. **A cornerstone for nature's recovery is safeguarding and achieving favourable condition of our most important wildlife sites. We want to see the inclusion of a protected sites policy covering Natura 2000 sites and SSSIs which is currently absent. As the top tier spatial plan the NDF should include policies for spatially defined national designations.**
 - 3.10. We support the inclusion in the NDF of policies for a National Forest and a Valleys Regional Park. We want to see these policies implemented in ways that also achieve the biodiversity and climate objectives of the plan. For example, the National Forest policy might be used to further the conservation of our globally significant 'Celtic Rainforests'.

4. Renewable Energy

- 4.1. The RSPB wants to see more onshore wind and solar renewable energy as part of a range of measures to address the climate emergency. However, development needs to be strategically planned and located in places that are low risk to wildlife to avoid adding to biodiversity decline.
- 4.2. The NDF sets out to create a more supportive planning framework for onshore renewable electricity. This is a pre-requisite for more onshore renewable electricity deployment, but UK Government support through the contracts for difference mechanism may also be necessary for significant implementation of the policy. The RSPB advocates the need for a level playing field for onshore renewable energy to compete with offshore wind. It is unclear whether the NDF is seen as a framework for delivering *unsupported* onshore renewable electricity or requires a change in UK policy for significant implementation. This has a bearing on how policies might be constructed.
- 4.3. Policy 10 establishes Priority Areas for solar and wind energy. A further policy (11) sets out criteria for development outside Priority Areas, National Parks and AONBs.
- 4.4. We are surprised that the NDF does not set out indicative targets for energy output from the Priority Areas (as was done for TAN8). **As a result, it is difficult to judge whether the NDF makes adequate provision for onshore renewable electricity over the period of the NDF.** We recommend publishing separate indicative energy targets for solar and for onshore wind Priority Areas.
- 4.5. The NDF sets out Welsh Government's 2030 targets for renewable electricity generation. To meet the 2050 target the UK Climate Change Committee advised that the UK electricity system should be substantially de-carbonised over the next decade with 74-87% of electricity generation to be low carbon by 2030. **There is a case for reviewing and rolling forward the Welsh Government's target to cover the period of the NDF.**

- 4.6. The NDF says that Priority Areas were identified through a strategic review of landscape and visual impact (p37). An analysis of Natura 2000 sites was also used in their refinement. We are surprised that ecosystem resilience and the Environment Act was not given more weight in this process. However, the detailed evidence supporting the policies (reports by ARUP) state that ecosystem resilience should be taken into account at a later stage in the decision- making process. This needs to be reflected in the detailed policies.
- 4.7. The stated intent of the NDF (p36) is to direct development to Priority Areas. It is hard to predict how far the NDF will achieve this outcome given that **policy 11 states that large scale projects outside Priority Areas are also acceptable**. There is no indication that such developments would be exceptional. There is a risk that this could work against the intent of the NDF spatial strategy if development was to become overly dispersed and could make it more challenging achieving strategic investment in improving grid connections.
- 4.8. The issues raised for biodiversity and ecosystem resilience are very different between solar and onshore wind technologies. The evidence used to derive Priority Areas seems to have been strongly informed by the landscape and visual impact of onshore wind.
- 4.9. **Our Energy Vision research found there is much more potential to site solar energy than onshore wind in areas of low ecological sensitivity**. We estimated the potential for up to 170 GW of solar energy and 4 GW of onshore wind in harmony with nature. We would therefore expect to see greater provision for solar than onshore wind if the policies had been based on more clearly on biodiversity and ecosystem resilience. **We advocate separate policies and Priority Areas for solar and onshore wind technologies**.
- 4.10. **Policies 10 and 11 set out criteria against which developments should be judged. These policies are poorly constructed, confused and do not give sufficient protection for biodiversity interests. This is not consistent with reversing biodiversity decline which is an aim of the NDF outcomes**. We want to see:
 - 4.11. **Greater Recognition in policy 10 that Priority Areas include sites that are ecologically sensitive and where development would be unacceptable. We want the removal of the 'presumption' in favour of development where this affects significant biodiversity interests**. This is inappropriate in relation to biodiversity interests as the method used to define them mainly considered landscape and visual impact.
 - 4.12. **Re-drafting and re-structuring the criteria in policies 10 and 11 to adequately safeguard biodiversity interests**. This requires separating out the different requirements of biodiversity, landscape and historic environment against which the acceptability of developments should be tested.
 - 4.13. **We are particularly concerned that the wording of policy 10 weakens the protection of Sites of Special Scientific Interest by requiring development to minimise rather than avoid impact**. This also compounds a problem caused by the wording introduced in the published PPW (5.9.17) which potentially weaken SSSI protection. We have been assured that this is not the intent of Welsh Government and urge that the wording of the NDF and PPW are revised.
 - 4.14. Re-defining the boundary of the Anglesey Priority Area to exclude our nature reserve at Cors Dydga and surrounding area. We also make the case for amending the boundaries of 5 other Priority Areas to exclude areas which are sensitive for upland waders and our Cwm Clydach nature reserve.

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