

Consultation Response Form

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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 type="checkbox"/>

We do not like option of '**Neither agree nor disagree**' which dictates an overall position, ostensibly lukewarm, to a multifactorial issue. This dumbs-down considered responses to often complex issues. CPRW's position on many questions with internal sub-sets is often better summarised as '**Both agree and disagree**' and yet there is no tick-box to correspond to this position. We are afraid that number-crunching analyses will misrepresent our position.

- 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 type="checkbox"/>

Although we trust this is not intentional, read as a set, the wording of the 11 outcomes (dNDF 3 pdf. p18) gives an impression that:

- all Welsh people live in rural areas but work in towns
- Wales has no wild places where no-one lives
- we want a Wales entirely for what we understand, with our imperfect state of environmental knowledge, to be our own needs and not for biodiversity both for its own sake and benefits to ourselves which we do not understand or appreciate.
- we are not thinking of visitors or UK neighbours
- we don't care about global responsibility

There is some mismatch between these headline outcomes and more detailed outcomes as spelt out on p20 which becomes evident when they are combined (see below). Addressing this could correct some of the false impressions above.

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

General Response:

CPRW welcomes the improved structure and more direct style of the 2019 NDF, when compared to its confusing predecessor. In line with the aspirations of Welsh Government policy, the underlying theme is now more people-based and place-defined - but this can leave it unclear as to how resources, mechanisms and the existing agencies fit in to these

new concepts.

We must stress at the outset that we would like to see our comments on the target Outcomes reflected in **Policy Wording** because ultimately it is this which will determine the actual outcomes.

It also does not prevent the NDF from having what we see as an unduly urban-centric approach to rural issues. To many - whether living in towns, in the countryside, or across Offa's Dyke – rural Wales is of key importance to the nation's identity, culture, and economy.

Similarly, we do not accept the exclusion of marine issues from this essentially terrestrial NDF as compared to the explicit references in the 2018 edition.

Many of these issues can be remedied by re-focussing relevant aims and desired outcomes, but the important Assessment of Onshore Wind and Solar Energy potential is in our view a far more problematic matter. In our detailed response to Q7 below we contend that it is incapable of being considered as a Framework document - in part because of the prematurity of its previously unpublished and novel material, which in contrast to the other topics has not been subject to a proper consultation, scoping exercise or environmental impact assessment. CPRW cannot understand why it omits consideration of marine renewable energy resources with the result that fails to be comprehensive. At the same time it presents an artificial and wrong-headed approach of shoe-horning the two identified terrestrial technologies into so-called Priority Areas which are incapable of accommodating them without extreme environmental, landscape and social harm. CPRW concludes that the Assessment is both so misconceived and so error-laden that it is unfit for purpose. We have compiled an additional free-standing critique of its content to support our view and we have already written separately and urgently to relevant Ministers requesting that it be removed from the present NDF until it has been re-scoped, re-written and subjected to further public consultation.

Chapter 3 – NDF Outcomes

Taken as a whole, the 11 one-line summary Outcomes (p18) appear reasonable, and CPRW welcomes the early reference to '*vibrant rural places*' in item 2. However, we do not accept the omission of references to the marine environment, which was an integral part of the 2018 NDF. (see Outcome 9 below)

Further, we fail to see how the NDF embraces the key roles of existing rural agencies, such as NRW and Cadw and how it will achieve harmony with Planning Guidance in the TANs, and with LDPs. See 2018 response)

Taking the more detailed individual descriptions (p20) we would comment as follows:

Outcome 1:and work in connected, inclusive and healthy places

Our cities, towns and villages will be physically and digitally well-connected, offering good quality of life to their residents

We are pleased to see the integrated reference to '*cities, towns and villages*' but the aim is too narrow. Wherever possible, clear spatial distinctions should continue to be secured between them so as to maintain their individual sense of place and rural hinterlands, conserve farmland; and protect landscape integrity. We support suitable settlement hierarchies in Local Plans and encourage the Welsh government to ensure an appropriate degree of conformity between LPAs, reflecting the character and needs of each. "Healthy places" doubtless refers to air-pollution, green spaces etc., but the NDF should consider health services, the strategic need for health services, more accessible primary health care

services, including the full range of preventative care, in rural places and for new developments (see Outcome 2).

Outcome 2: *in vibrant rural places with access to homes, jobs and services*

“In rural areas, job opportunities and community services will be supported to help attract and retain people”

With oblique exceptions in **Outcomes 9 and 10**, this is the chief reference to rural Wales and needs a greater focus upon its countryside as a key and multi-dimensional facet in the life of the whole nation. We have therefore included responses to a wide range of rural-related topics within the NDF.

Rural Society

We are pleased to see the reference to ‘Rural Proofing’ at ISA 1.3.32-33 which recognises the marginality of rural life in relation to generally available services but we are concerned that in practice these may be overlooked or dismissed for consideration in ‘lower tier plans’. A paramount concern is the need to reverse the ageing population in the countryside, in which a key consideration - especially for both ends of the age-group - is the availability of broadband and a good mobile phone network (as indicated in Outcome 8). Education and social services are key issues. More accessible primary health care services, including the full range of preventative care, and transport to and from distant hospitals is essential in rural areas to address urban/rural inequalities.

We note the aim of balancing development with ‘*preserving the character of rural Wales*’. As its title states, CPRW has long ago moved on from the “aspic” concept of our countryside and sees ‘Protection’ as essentially more flexible – both in terms of landscapes, land uses, habitats and the economic and social character of the countryside.

Landscape

We support in principle the aim of strengthening rural communities and their populations, but rural Wales is not uniform. Scale, diversity and location mean that the individual character and needs of such local places require appropriate and varied plans. Rural Wales should be recognised as a multi-functional asset in which its landscape and environment play a crucial part in the economy of the whole country.

Support for Agriculture

CPRW has responded in detail to the concurrent Consultation on **Sustainable Farming & Our Land** (SF&OL) in which we noted the multi-purpose link between a wide range of ‘public goods’ and farming, and the need for a new sustainable and well-targeted farm policy whether post-Brexit, or after non-Brexit. This is critically necessary in upland Wales – both inside and outside designated areas. Once more, we register our disappointment over the failure to integrate Sustainable Farming & Our Land with the NDF.

There is no specific reference to agricultural land quality, defined in the Welsh Government’s Agricultural Land Classification (ACL) as updated, expanded and issued in November 2017. Although the ACL must be used to underpin a strong land use policy to protect Best and Most Versatile (BMV) areas from development pressures, this is not just about farming or the location of RE schemes. The ACL should be a fundamental building block for the NDF to provide guidance on optimal land use across the whole spectrum. The desire to protect “productive land” (NDF p24) is simply not specific enough.

As an example, we note that in the Powys LDP Inquiry (2018) the first opportunity to use the new ALC to inform policy was not taken (in spite of a relevant Chief Planning Officer letter).

In this NDF, the failure to exclude Agricultural Land Classification Grade 3a from the Priority Areas, once more, contravenes the Welsh Government's duty to protect the Best and Most Versatile (BMV) farmland. This is surely an unintended outcome of a methodological error by Arup consultants.

Outcome 3: in distinctive regions that tackle health and socio-economic inequality through sustainable growth

“The regional approach will recognise that different parts of Wales work differently to each other, with distinct underlying characteristics and challenges”

This can only work to the extent that the Regions do have distinct underlying characteristics and challenges and each forms a coherent unit for social and economic interaction. We comment further under Policy 16.

CPRW wishes to flag up the pervasive West-East economic, land use and cultural linkages across the English border. We do not consider that this relationship is fully explored in the relevant parts of the NDF. There should be consideration of cross-border impacts of development in Wales on English designated landscapes, and recognition of the high quality of Welsh landscapes that adjoin the AONBs in England. Development such as grid connections could also impact adversely on designated and locally special landscapes across the Border.

Biodiversity interests, water quality in our rivers and air quality are cross-border issues which cannot be properly and fully addressed on a Welsh-regional basis or a Wales-only basis.

Wales must be an outward-looking nation which works more closely with neighbouring countries for the common good and for the common environment. This is particularly so in the emerging context of Brexit. We are also concerned that the NDF does not mention the very special relationship with the Republic of Ireland.

Outcome 4: in places with a thriving Welsh Language

“We aim to have a million Welsh speakers in Wales by 2050 – an increase of almost 80% on current levels.”

We applaud the ambition of a developing living Welsh Language and the recognition that development will be managed in Welsh-speaking strongholds but this conflicts with the inevitable changes consequent of the designation of 15 large Policy 10 Priority Areas covering some of the most rural Welsh-speaking areas.

Outcome 5: and work in towns and cities which are a focus and springboard for sustainable growth

Cities and large towns are magnets for jobs and investment, while people are drawn to live and work there for the economic and social opportunities they provide.

The impact on areas on the periphery of towns is likely to be mixed, with some benefits from improved connectivity and additional investment but also the risk of urban sprawl and invasion of green spaces and agricultural land

Outcome 6: in places where prosperity, innovation and culture are promoted
Development Plans will have a forward thinking, positive attitude towards enabling economic development, investment and innovation.

A perennial issue for CPRW is the inability of certain LPAs to enforce specific Planning

Conditions on contentious or finely balanced planning consents. The ambition to enable population growth and economic growth whilst reducing pollution and increasing Green Infrastructure is a case in point. Although this may not be a classical Framework issue, they are highly relevant to mitigating the adverse impacts of development and securing positive outcomes. If the public cannot trust planning conditions and 106 agreements to control impacts of consented developments, or to secure environmental or social benefits, this undermines the role of the planning system as the cornerstone of local democracy.

Local democracy is also threatened if the public do not have reasonable access to third party comments on planning applications. A modern and forward looking Wales should encourage transparency and public participation in shaping the places where people live and work by insisting Planning web-sites display the full sum of public comments. This is especially relevant now that paperless procedures are encouraged and car journeys to distant planning departments should be discouraged. (see Outcome 8)

Outcome 7:..... in places where travel is sustainable

All methods of travel will need to have low environmental impact and low emissions, with ultra low emission vehicles and public transport replacing today's petrol and diesel vehicles.

Rural or semi-rural communities are likely to be expanded to provide "dormitory" homes for city commuters. This will risk increased use of private transport with implications for air quality. Reducing the environmental impact of travel is incompatible with significant expansion of rural communities. New developments in villages frequently have accommodation for two cars per house, extra hard-standing and additional parking facilities.

Outcome 8:..... in places with world-class digital infrastructure

Broadband provision will develop and evolve, beginning with comprehensive coverage of superfast and progressing to ultra-fast fibre, which will help businesses to be more productive, resilient and innovative.

We welcome this outcome and encourage Welsh authorities at all levels to live up to this opportunity by **improving their web-sites** and making their policies, strategies and positions on key issues clear to the public. We note that the WG has given no clear signposting to the documents required to properly assess this dNDF and we are still discovering more at the very end of the extended consultation period. (see Outcome 6 above)

Outcome 9:..... in places that sustainably manage their natural resources and reduce pollution

Wales' natural resources, including its minerals, coast, water, forests and landscape and seascape, support a range of activities and sectors and are assets of great value in their own right.

We are pleased to see that the importance of landscape is now articulated in the headlines for Outcome 9, in which we wholehearted echo the concept that landscapes and other attributes of rural Wales are '**assets of great value in their own right**'.

We have underlined this key concept which should permeate the NDF's role in relation to rural land use, spatial policy and Outcomes 2, 10 and 11. Unfortunately we fear that the fine words and laudable sentiments may evaporate when challenged by other Outcomes. For almost a century, CPRW's central concern has been the protection, enhancement and promotion of the country's landscapes - whether recognised as nationally or locally important - and the recognition of the land uses that can - or do - sustain them. The real test of the NDF will come when it has to flesh out Outcome 9 and reconcile it with the

conflicting aims of others.

We give examples below where this Outcome needs to be given more clarity and emphasis.

There is no Policy recognition of the key importance and breadth of vision set out in the European Landscape Convention which provides a comprehensive template for an exercise of this type. Further the dNDF focuses only on nationally designated areas, fails to consider the whole land use spectrum and has no vision to enhance those areas which are not already recognised as of national significance. When PPW11 is drafted, there is an opportunity to widen and clarify this myopic approach. Specifically, the NDF fails to have any wording to give protection to locally important landscapes (such as Special Landscape Areas),

We find it incomprehensible that the Welsh Government can articulate this declared aspect of Outcomes 2 and 9 while pursuing the unwarranted and insensitive and concept of the 15 Priority Areas for onshore wind and solar energy. (See Outcome 11 & Q7, as expanded at Section 15 below).

We are disappointed that the dNDF does not mention of Seascapes, that the strategic framework is not integrated with the marine strategic framework in the WNMP and that marine ecosystems and resources are not mentioned in Outcomes 9 and 10. The NDF should provide a summary of the WNMP and incorporate the key points into the NDF itself. The visual impact of large wind turbine arrays on the iconic Welsh coastline needs more detail.

CPRW's core concerns cover Welsh land, Welsh waters and Welsh coast. Wales is surrounded on three sides by internationally important waters with rich but vulnerable marine habitats. The coastline contributes to Welsh identity, attractiveness and tourist appeal, particularly through initiatives such as The Wales Coast Path and Blue Flag beaches and rich marine habitats are of paramount importance for tourism.

Outcome 10:..... *in places with biodiverse, resilient and connected ecosystems*

The variety of flora and fauna found across Wales make Wales a special place.

We cannot be too emphatic in welcoming the WG undertaking to reverse the decline in biodiversity and to make the planning system ensure that wild life thrives throughout Wales.

If this undertaking is to be fulfilled, radical change in the emphasis on protection and enhancement of biodiversity and habitats at **all levels** in the planning system, including in the over-arching NDF itself is **mandatory**. (See responses to Policies 8 & 10, the HRA, and the ISA.)

Planning protection for biodiversity observes a hierarchical framework in which only the top tier of nationally and internationally designated sites and European Protected Species receive anything like proper attention and even this level of protection is wanting.(see HRA response).

We are facing a catastrophic decline in species and species population numbers. The most critical are the smaller or microscopic biological organisms, generally unknown to the planning regime, underlying our entire range of ecosystem networks and also agricultural productivity. An example of how we are failing in blanket protection of these is the exceedingly permissive response to rising ammonia levels from new intensive livestock farming units. The NRW guidelines only apply to top-tier designations and, in addition, condone high risk impacts to woodlands.

At present the “net enhancement” required by recent the Chief Planning Officer letter 23/10/19 to LPAs is a pipe-dream. The WG needs to make it a realistic possibility by putting locally important habitats and biodiversity at the centre of planning decision making.

The only way we can tackle this emergency through planning is to insist on habitat protection and enhancement, **for every development site**, at all levels of planning, including regional and local levels. This will require WG co-operation in augmenting ecological expertise within the NRW planning team and applying it to guide hard-pressed LPAs in planning decisions and co-operate with them to enforce against breaches.

Outcome 11:..... in places which are decarbonised.

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.

We fully accept the scientific evidence for anthropogenic climate change and the need for renewable energy. We support an energy strategy based on evidence about the susceptibility of our environment to the different range of solutions and we believe that Policy makers, businesses and individuals simply cannot continue with the current rate of consumption and environmental degradation assumed in “business as usual”. It is a misconception that CPRW is “against renewable energy”.

CPRW considers urgent action on carbon emissions should start with basic evidence and research. It is questionable whether this exercise has been carefully undertaken for Wales but, to the extent that it has, there is no evidence that it contributes to dNDF RE Policy. The dNDF Energy Policy 10 (and to a lesser extent 11) apparently derives from a WG percentage **emissions** undertaking and a percentage **renewable electricity** undertaking rather than any over-arching Government energy strategy guided by **evidence**.

Fundamental questions are:

1. How much RE do we already have?
A tally of existing capacity on land **and at sea**, operating, in planning or under construction The life-span of this and potential for repowering where appropriate. Energy imports and exports from neighbouring countries.
2. How much RE will we need for the future extrapolating from the present?
What is the possible rate of change-over from fossil fuels to renewables given the need to change energy-dependent infrastructure and capital goods especially involved heating, transport, industry, construction and agriculture.
3. How much could we save, especially through strategic planning and regulation
Assessment of scenarios for future energy needs should take the potential for energy savings into account.
4. How can we meet the short-fall with new projects
Currently available renewable technologies, technologies in development and storage technology should all be assessed for their capacity, life-span, consumption of scarce resources etc. Storage and intermittent generation must be considered.
5. What are the scenarios for deployment
Taking into account long-term costs and import/export forecasts for electricity
6. What are the impacts of the different technologies and scenarios on the different aspects of long-term protection of our environment, including human health, general

well-being and prosperity?

7. Once we are better informed, where shall we put what and how shall we incorporate it into National Policy and the dNDF?

CPRW does not pretend all this is simple or even fully possible but the WG must, at least, learn through facing the realities of what Wales needs to provide **and** what its Planning Regime has to protect, for a truly sustainable future.

We believe this issue is so important that we have divided and structured our submission so that the points in our response can be better understood. They are set out under Q15:

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:

We do not accept the focus on terrestrial issues to the exclusion of the marine

environment. (see response to Outcomes 2 and 9 above and Q7 below)

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?

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?

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?

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

1. The NDF Biodiversity Policy

1.1. The NDF Biodiversity Policy is a strategy for WG and key partners to enhance biodiversity and ecosystem resilience by:

- Safeguarding areas as ecological networks
- Ensuring “green infrastructure” is incorporated into development proposals.

Planning Authorities should incorporate these sites into development plans, policies and strategies and demonstrate cumulative action. The way this will happen is less clear and depends on the relationships between “key partners” and the level of authority invested in each. (See response to Q8: Policy 16).

1.2. We warmly welcome the intention to embed ecological networks and green infrastructure within the planning system in spatial plans but, on the basis of the Policy 8 presentation, we have many doubts about how this can work in practice and recommend that the confusion is addressed.

2. Level of Planning hierarchy

2.1. Policy 8 says action is “best” at regional or local level and therefore the strategy is entrusted to lower planning tiers. LPAs should work with NRW, whose forthcoming 7 Area Statements covering 6 areas of Wales (+ one marine) will provide an evidence base and identify priority areas for action. These will count as material planning considerations and therefore NRW has a major new role in planning. Strategic and local plans will make Green Infrastructure Assessments which will use NRW indicative maps on biodiversity themes as a starting point, and will develop spatial plans and strategies for intervention.

2.2. Regional and Strategic development plans are new arrivals at the ball. They introduce different areas of jurisdiction in addition to the new NRW Areas and existing LPAs. We also read in “**Supporting Green Infrastructure**” that “*Local authorities and Natural Resources Wales should work together to ensure that appropriate action is taken to safeguard sites both **within and beyond** their administrative boundaries*”. This presumably means through joint agreements with neighbouring authorities which, for some LPAs, are partly in England. We believe that the multiplication of jurisdictions will make it even more difficult for cash-strapped and poorly-staffed LPAs to function and we have much sympathy with their plight.

3. **New concepts not yet tested in planning**

3.1. “*Green infrastructure*” - a much-quoted but little tested concept probably more appropriate to urban areas than countryside

3.2. Area Statements – an entirely new idea, likely to be based on GIS maps. Area Statements are so much delayed in evolution that now there is no time left, before they are launched in Spring 2020, for the promised meaningful consultation about the usefulness of these maps or about local biodiversity issues with local stakeholders. We have no idea about the size, purposes or descriptions of AS priority areas and how they will accommodate different forms of land-ownership. NRW managers say they expect the development of area statements to be web-based and “iterative” which probably means “quasi-experimental”. All these factors will make it difficult for planning authorities to address the NRW priority areas as material planning considerations and to integrate them into green infrastructure intervention strategies.

CPRW welcomes Area Statements as possible leverage for the extreme difficulties LPAs demonstrate in fulfilling their Section 6 duties through planning and a means of increasing wild-life corridors to combat habitat fragmentation. However, we are disappointed with progress so far.

4. **Conclusions**

4.1. Overall, the strategy is muddled over about who being is required to do what, unclear about how action will lead to outcomes and not specific enough about how the outcomes will be achieved by the strategy.

4.2. Policy 8 strategy is designed to safeguard areas as ecological networks and ensure “green infrastructure” is incorporated into development proposals. **Outcomes 9 &10** require management, maintenance and enhancement of “*environmental value of resources*” (whatever that means), reduction in air pollution and reversing biodiversity decline. These are more ambitious outcomes and, given the many untried new planning tiers in the NDF, we cannot be sure that the strategy will succeed in achieving the outcomes.

4.3. The value of ecological “priority areas” is double-edged: while they can increase the chances of protecting these areas they can act as an excuse for degrading others. How many planning applications devote more effort to showing the development is **not** in or near any designated area than to honest assessment of what **is** at risk in the area of development?

4.4. Policy 8 as currently described does not promise to deliver the protection and enhancement required to **reverse the decline in biodiversity** required by the Environment Wales Act and UN 1992 Convention on Biological Diversity (EA s6 4 (a)). Policy 8 requires strengthening through revision.

5. **Relation to HRA and Policy 10**

- 5.1. The NDF HRA Appropriate Assessment concludes (p39) *“the inclusion of Policy P8 within the NDF (which it is anticipated will indirectly provide protective buffering for Natura 2000/ Ramsar sites by protecting and enhancing ecosystem services, ecological networks and biodiversity in the wider countryside) provides an overarching safeguard to which other policies within the NDF, as well as those in lower-tier plans, will be required to adhere”*. We do not agree. Policy 8 does not mention buffering of designated sites and the strategy is not an overarching safeguard. It delegates as yet undefined spatial safeguarding powers to lower-tier planning authorities.
- 5.2. We note that the large allocation of land to Priority Areas for Wind and Solar development will have a significant net negative impact on biodiversity. The HRA addresses impact on Natura 2000 and Ramsar sites but not the inevitable devastating impact on ecological networks throughout Wales

6. National Forest

- 6.1. CPRW welcomes the idea of a National Forest. This needs to be ambitious in shape, character and location, providing continuity across Wales and the full variety of native woodland types and habitats with different densities of tree cover and other plant communities. We note that, in contrast to other development policies in this Framework, there is **no spatial plan** suggesting that Policy 9 is an “also ran” Policy. We urge the WG to give the National Forest the same status and urgency as the economic development policies at the centre of the dNDF.

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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<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 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?

CPRW's disagreement is more fully set out in **the separate self-contained submission appended to this response SEE Q15**. It wishes to see a fully informed analysis of the climate emergency and a comprehensive suite of policies designed to address it. It stresses that it is most eager to contribute constructively to the policy debate in achieving this aim but at present the NDF does not provide a coherent and fully-argued basis for doing so

CPRW's concerns are summarised in its **Urgent Interim Response** to Ministers dated 7th November 2019. In it we argue that the previously unpublished Assessment of Onshore Wind and Solar Energy potential is so misconceived and error-laden that it is unfit for purpose, and should be removed from the NDF until it is re-scoped and re-written.

Briefly the reasons for this are:

- the Assessment does not set out a clear statement of current and projected electricity generation and consumption; ignores the fact that Wales is a net exporter of electricity; and fails to quantify the level of additional renewable energy output required to reach the target of 70% by 2030;
- it considers only onshore wind and solar technologies as contributors and ignores the role of other existing and viable sources over the target period, notably the draft Marine Plan's commitment to expand offshore wind;

We note that the 2018 NDF

- it is full of fundamental errors in defining the 15 wind and solar Priority Areas and fails to describe or assess potential impacts of its proposals upon them;

- d) although incredibly complex, it is not a fully-fledged document and has emerged into the NDF process without prior consultation or public debate;
- e) in its present form it is not therefore a Framework document conforming to the aims and scope of the NDF as a whole - and is **unfit for that purpose**.

Extra Issues

Planning conditions

We would like to draw your attention to the impact on LPAs of WG Ministers deciding all RE projects over 10mw but expecting LPAs to deal with the problems of discharge of conditions (which they have not set themselves), with developers who act in breach of conditions and with issues of enforcement. We believe this is “power without responsibility” – the responsibility, financial costs and legal risks falling on LPAs.

WG Plans, Policies etc. are not integrated or synchronised

PPW11 has not appeared, dNDF is at the end of consultation, Sustainable Farming & OL has just finished consultation, The dManual for LDPs is having responses reviewed, the WNMARINE P has just been adopted. Ideally, these policies should be integrated and refer to one another.

Local Ownership of RE

This has been poorly thought through and, at its most feeble, seems to just require a development company to have Welsh office.

Marine Energy

We are at a loss to understand why the onshore wind and solar assessment is not accompanied by an analysis of the marine energy potential so that a comprehensive and rational approach to renewable energy deployment can be considered. At present the Priority Areas for these two technologies alone are defined under a false prospectus. In the 2018 NDF there are clear references to the Wales national Marine Plan (WNMP) in ‘NDF Issues, Options & Preferred Option - Consultation Paper’ at Appendix B p12 which states:

There is significant renewable energy potential off our coastline, including tidal, wave and wind energy. The Welsh National Marine Plan seeks to maximise the opportunity to sustainably develop marine renewable energy resources, whilst fully considering other's interests and ecosystem resilience. The planning system has an important role to play in facilitating the on shore requirements of these generators, as well as enabling associated leisure and tourism benefits.

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

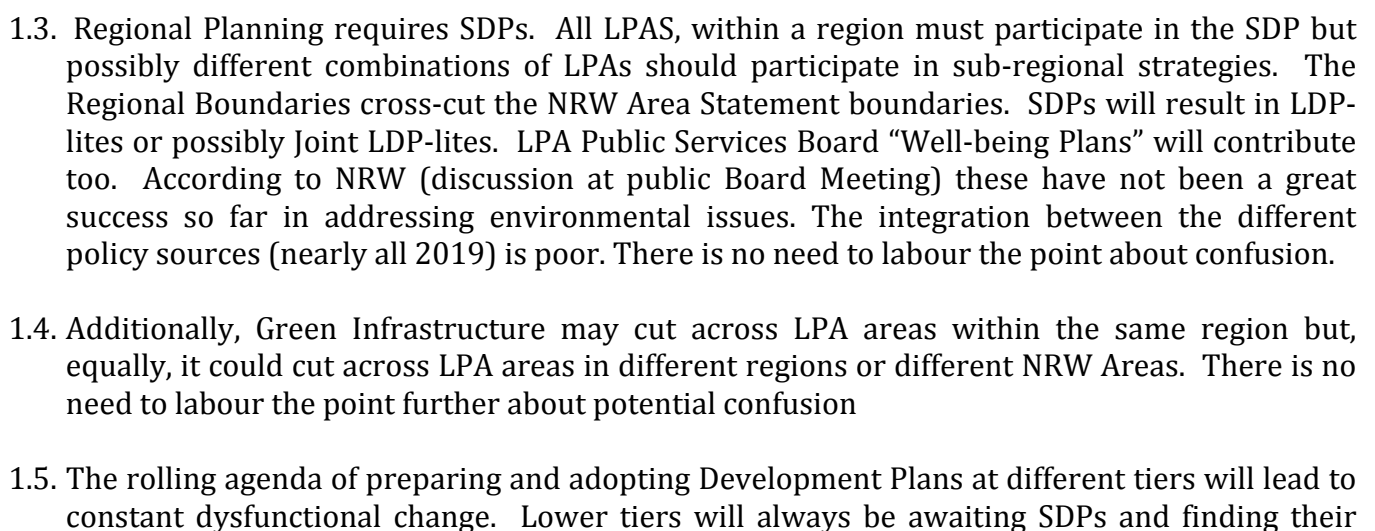
1. Policy 16: Regions and Strategic Development Plans

1.1. The NDF will be built on by SDPs at a Regional level and LDPs at a local level. Therefore LPAs would have to co-operate to participate in SDPs.

1.2. However it is not so simple.

Confounding factors are:

- “Local planning authorities **should determine their geographical footprints**” (NDF p46)
- “Strategic Development Plans are prepared at a regional level covering **more than one local planning authority area**” (NDF p10)
- “Strategic Development Plans are prepared at a regional scale. They consider strategic regional issues in relation to future growth areas, housing demand, economic development, transport and green infrastructure which **cut across local planning authorities** and require a regional, integrated planning response” (NDF p44)
- “An SDP must express a vision and a strategy to deliver the vision for the region as a whole. In addition, it should also express **sub-regional strategies for either individual LPAs or combinations of LPAs to enable LDPLs or JLDPLs** to be progressed at a later date” (Development Plans Manual Ed 3 2019 10.6)
- “To initiate the SDP process and establish a Strategic Planning Panel (SPP) to prepare an SDP, **an LPA or group of LPAs acting on behalf of all those LPAs wishing to participate in an SDP** (the responsible authority (ies)) must approach the Welsh Ministers to express an interest in progressing an SDP “ (Development Plans Manual Ed 3 2019 2.7)
- “Where change happens at a more local scale where an SDP is adopted, **LDP Lites (LDPLs)** will be the more appropriate way forward. These will be much shorter, focussed plans, essentially an allocations document, accompanied by local policies.” (Development Plans Manual Ed 3 2019 2.10)
- The preparation of **Local Well-being Plans, Area Statements** (Natural Resources Wales); regional transport models and plans (Transport for Wales); and the Welsh Government’s Housing Need Assessment are examples of work that can directly support the preparation of Strategic Development Plans (NDF p46)
- “There is to be **a public services board for each local authority area** in Wales.” (WBFGA)



local programmes discredited. Conflicts will arise for LPAs as their recently adopted LDPs are contradicted by over-arching spatial policies. The type of spatial planning conflict resulting from this NDF for LPAs with recently adopted LDPs, who discover they contain Priority Areas in Policy 10, will be repeatedly reproduced throughout the hierarchy. The loss of periods of planning certainty discourages authorities and undermines democracy, threatening local public participation in shaping our places through the planning system.

- 1.6. We cannot see how LPAs, who are already struggling for funds and staff, particularly staff with adequate professional qualifications and experience, could possibly manage all this. The management time devoted to meetings, administration, reports and WG box-ticking will leave LPAs in an even worse state than they are currently. We anticipate that the stress of coping with an unworkable muddle of planning tiers will mount, recruitment will suffer further and new inexperienced staff will be even less able to cope. CPRW is very sympathetic with the predicament of LPAs.
- 1.7. Both the role and operation of the Regional System need simplification and clarity about chronology, integration and public participation across the suite of government policy.

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?

[illegible]

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>
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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.

1. Three Regions

- 1.1. While we are not fully convinced of the common interests within any of the three Regions, the worst in this respect is certainly Mid and West Wales which unites Powys, Ceredigion, Carmarthenshire, Pembrokeshire, Swansea and Neath Port Talbot.
- 1.2. This huge area is evidently a residual category once the "near South" (Cardiff-centred industrial belt and Valleys) and the "far North" have been delineated. It is as large as the other two combined and has presumably been designated to even up the populations of the three regions. However this decision in no way respects the strategic needs of the major areas within this Region which are different precisely because of the rural nature of Mid-Wales and the fact that there is no clear dependency on any particular large Welsh or English town. The small traditional market towns of Powys, and Ceredigion, rooted in the very rural areas they serve, have vanishingly little in common with Swansea and Neath Port Talbot in almost every social and geographical respect. The populations know nothing about each other unless, perhaps, someone falls asleep on the Heart of Wales Railway line.
- 1.3. We trust we will not be the only ones to query the rationale for this Region and ask for it to be divided into two with Powys included in a Central East region with Ceredigion. This Region would have the distinct advantage of being coterminous with the NRW Area and being more similar in size to the others.

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.

1. ISA 17 Objectives

- 1.1. The Arcadis ISA selected **17 objectives** (Table 2-1), informed the NDF drafting and checked the sustainability (derived from the Well-being of Future Generations Act) of the consultation draft. CPRW applauds the undertaking of this exhaustive iterative approach however the 350 pages of the stages and suite of tables illustrating the procedure are too extensive and complex for our detailed assessment in this context. We are not surprised that many other responses fail to address them. Sadly, this omission will mean that an important overall view of the fitness of the NDF is lost.
- 1.2. The central question must be whether the **17 objectives** (as measures) do capture and ensure the **sustainability** of the dNDF. Four topics are central to our remit: **landscape, biodiversity, heritage and living conditions in rural communities**. All of these are of key importance to "rural proofing" and demonstrating sustainability in these areas is essential to prove that the ISA "helps to ensure that the ISA and NDF takes into consideration the interests of a diverse range of people reflective of Wales." (p9).
- 1.3. ISA 1.6.4 quotes the **SEA Directive requirement** to consider "the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural heritage, landscape and the interrelationship between the above factors..." This requirement covers our remit apart from some aspects of rural living conditions such as economic opportunities and protection of amenity.

2. Landscape

- 2.1. In the NDF, Wales is described as a living landscape and NDF Objective 9 says that Landscape qualifies as an "asset of great value in its own right". There are various tributes to the quality of particular landscapes but overall NDF policy is weak on the subject. Within the NDF reasoned justification there is a scattering of the broad statement "The management of natural resources and flooding and the protection and enhancement of areas of environmental and landscape importance should inform strategic decisions on locations for growth and new infrastructure." The reasoned justification for Policy 10 claims "A strategic review of landscape and visual impact identified the Priority Areas for Solar and Wind Energy as the most appropriate locations to accommodate landscape

change” which we dispute.

2.2. ISA objective 13 mentions Landscape. Table 1.6 relates the SEA Directive topic of Landscape to ISA Objectives 7, 13, 14 & 17 and ISA 2.4.2 considers Landscape has been strengthened. But when we look at **Policy-wording, which is the critically important part of the NDF**, Landscape is mentioned hardly at all: Policy 6 and Policy 11 insist “significant adverse landscape impacts” must be avoided. Policy 10 includes “acceptance of landscape change” in Wind and Solar RE Priority Areas.

2.3. Landscape is discussed in more detail in our responses to RE policies see Q15.

3. Biodiversity

3.1. The ISA analysis relies on the incorporation of the HRA which relates only to Natura 2000 sites and Ramsars. These are important but only represent a minute portion of the declining species and habitats at critical risk throughout Wales.

3.2. Even if we accept the scoring in the key Table 2.8, Air quality, Water, Biodiversity and geodiversity, & Natural Resources all score plenty of “minor negative” (pink), some of which should undoubtedly be “strong negative ” (red) had there not been an underlying bias towards positive scores and motive to suppress red scores. The only NDF Policy red score red is the long-term impact of the Development of Holyhead port on Green House Gases and Energy. Many strong positives rely on the “mitigation” of avoiding negative impacts and some of these connections are tenuous.

3.3. The Policy 10 Priority Areas covering 20% or rural Wales scores dark blue: “range of positive and negative outcomes”. The NDF must have regard to Section 6 of the Environment (Wales) Act, which in turn is governed by the UN 1992 Convention on Biological Diversity (EA s6 (a)) which notes that “the fundamental requirement for the conservation of biological diversity is the **in-situ** conservation of ecosystems and natural habitats and the maintenance and recovery of viable populations of species in their natural surroundings”

3.4. We note that the amended ISA published on 28/8/19 replaced “the NDF seeks to maximise onshore wind and solar energy potential, whilst **minimising the potential impact on the most sensitive environmental and cultural assets**” with a more bland statement: “there is a presumption in favour of large scale on-shore wind and solar energy generation potential in the Priority Areas for Renewable Energy, and acceptance of landscape change and **a focus on maximising benefits an minimising impacts.**” “Sensitive environmental and cultural assets” has been removed.

4. Heritage/Historic Environment

4.1. We note that the amended ISA published on 28/8/19 removed the reference to cultural assets on p143 of ISA replacing “the NDF seeks to maximise onshore wind and solar energy potential, whilst **minimising the potential impact on the most sensitive environmental and cultural assets**” with “there is a presumption in favour of large scale on-shore wind and solar energy generation potential in the Priority Areas for Renewable Energy, and acceptance of landscape change and **a focus on maximising benefits an minimising impacts.**”

4.2. This is represented in ISA Objective 14 which has an overwhelming negative (pink – but see 3.2 above) score against dNDF policies. This should be addressed **in dNDF Policy** so that a

transparent positive assessment is achieved.

5. Rural Living Conditions

5.1. The NDF is largely a framework for towns and the “rural-proofing” exercise is not convincing. The realities of the rural economic structure is not recognised. We regret that, although “tourism” appears scattered throughout the ISA, it does not appear once in ISA Objectives or in dNDF Policy wording. NDF Policies 10 and 11 (renewable energy) score positively against a swathe of economic factors however associated employment opportunities for rural residents are very limited and confined to construction phases (therefore short-term only) while the impacts of the Priority areas in Policy 10 on rural income from tourism threatens to be economically devastating for rural market towns and smaller communities.

6. Conclusion

6.1. Table 2.8 (p55) matches NDF policies against the **17 objectives** however the scoring depends on aspirational “guesstimates” of the **impacts of the dNDF policies** and the **ability of the NDF policies to achieve the NDF outcomes** which makes the entire exercise open to accusations that is both circular and value-laden rather than objective.

6.2. ISA Conclusion (p66) says “the Spatial Strategy proposed in the NDF would be expected to result in predominantly positive sustainability impacts, with significant positive impacts on most ISA Objectives likely.”

However it goes on to say that **impacts on :**

Objective 5 -Welsh Language,

Objective 6 – GHG & Energy

Objective 7- Flood-risk,

Objective 8 - Air Quality

Objective 9 – Water

Objective 13 – landscapes and townscapes

Objective 14 –Historic Environment & Assets

Objective 15 - Welsh Culture

Objective 16 - Biodiversity and Geodiversity

Objective 17 – Natural resources

- which is **ten out of seventeen Objectives**, were “**more mixed**”.

6.3. The WG is facing a Climate Change and Biodiversity emergency. When those **Objectives which not clearly met are presented in a transparent list as in 6.2 above, this does not support the ISA conclusion about the sustainability of the NDF.**

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?

Our HRA Response is set out in full in Appendix 2 to our expanded response to Q7 which has a summary at Q15.

1. Dating issue

- 1.1. The handling of HRA documents has been regrettable. The HRA was clearly not ready for consultation with the public. The original HRA documents presented for public consultation were incomplete, partially out-dated and did not include the essential evidence relating the refined Priority Areas (PAs) to Natura 2000/Ramsar sites (NK2/Rs) in the 8 maps now provided in APPENDIX B: Appendix B. The WG changed the documents for this legally required HRA process after the consultation began and without alerting the public. After our complaint, the consultation period was extended by a two-week period reflecting the date of the document change (21/8/19) rather than the later date on which the public were notified of the change (17/10/19).
- 1.2. This is the third Arcadis draft signed off on 1/7/19 of the assessment made on the dNDF dated 15/5/19 later described as “first draft of NDF” (p1). The dNDF for consultation is only dated by the consultation dates (7/8/19 to 1/11/19 - now extended to 15/11/19) so we do not know if the 15/5/19 version was the final dNDF.

2. General

- 2.1. The HRA is defined: “The consideration of the impact on the integrity of the Natura 2000 site of the project or plan, either alone or in combination with other projects or plans, with respect to the site’s structure and function and its conservation objectives”. With the three conditions (no alternative / IROPI / adequate compensation) governing consent in the case of significant likely effects on an NK2/Rs. The question is of whether it has fulfilled this remit.
- 2.2. The HRA report has a reasonable and clear structure. It describes clear set-back buffers for the site designations although the chough is the only species meriting a species-specific buffer. It sets out HRA requirements and screens the policies providing Appropriate Assessments for the 20 out of 33 Policies which are screened in. It provides a useful Rule of Thumb section. It claims that (p4) “Given the nature of the NDF, it is therefore the lower-tier plans which will include sufficient detail to allow for a meaningful assessment of the potential impacts that such development could have on Natura 2000/Ramsar sites. The HRA at this level of the planning hierarchy is therefore necessarily high-level and precautionary.”
- 2.3. It fails to address the in-combination effects within Policy 10 and between policies within the NDF because, it claims, without any specific sites, these cannot be assessed for any particular NDF policy.
- 2.4. It also fails to address the in-combination effects between the NDF and other policies, programmes etc. For instance, it says (p17) that since the WNMarineP has been subject to HRA which found there was appropriate lower-tier, plan-level mitigating provision, this together with the wording of the NDF will provide protection to marine environments. We believe that, in as much as there are spatially defined policies in the WNMP, there should have been discussion of the possible in combination effects of a spatially defined policies on land and in marine areas. An example might be discharge of effluent at sea from increased

development on land.

2.5. With respect to Policy 10, the first criterion of the DTA guidance is that “a plan making body may only rely on mitigation measures in a lower-tier plan or project” if “the higher-level plan cannot reasonably predict any effect on a European site in a meaningful way”. Policy 10, in particular is a **spatially defined** policy carrying a presumption of planning approval in PAs. Therefore there is a fundamental issue of whether NK2/Rs will in fact receive the same level of protection **with defined PAs** as they would have done **without defined PAs**. The report fudges this issue. The same applies, if in lesser measure, to some of the place/area specific policies (P17 - P33).

2.6. The Appropriate Assessments required by law do not discuss what types of mitigation/compensation are available or acceptable should the WG claim IROPI circumstances and the NDF confines its discussion of specific measures to protect biodiversity interests to Policy 8.

2.7. This is an HRA of the NDF “**and the process by which it was derived**” (APPENDIX B p2). The HRA correctly, emphasises that the **evolution** of the NDF has improved the prospects for NK2/Rs however the evolution of the NDF Policy 10 involved the ARUP distinction between fixed and variable constraints which also governs the entire classification of the **areas of most opportunity** which themselves underlie the delineation of PAs. The implication of including (for instance) peat deposits and fresh water surfaces as variable rather than fixed constraints is not discussed.

2.8. All the above leave an uncomfortable and serious doubt as to the level of protection which might emerge in practice.

2.9. We have already seen the Minister’s decision over Hendy Wind Farm, within the catchment of the Wye SAC which is only 1 km away, accept an Appropriate Assessment based on generic construction precautions with no site-specific information and no consideration about the presence or migration of species, including white-clawed crayfish, as set out in this HRA.

(p 6) *“Finally, whilst a buffer of 5km has been set for SAC habitats, wherever a riverine SAC is downstream of a proposed development, impacts associated with significant mobilization of sediment could extend further than this. This is less due to the fact that sediment is likely to travel further than this, and more because individual fish species associated with these sites can readily occur some distance upstream from the boundary of the designated river (e.g. in undesignated tributaries).”*

Furthermore, the Appropriate Assessment considered that Planning Conditions were sufficient protection but the Developer has proceeded without discharge of conditions precedent and no action has been taken.

2.10. **All the above leave an uncomfortable and serious doubt as to the level of protection which might emerge in practice.**

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?

Wales is fortunate to be a bi-lingual nation. We support the aim to increase the number of Welsh Language speakers and the need for the planning system to be pro-active in creating favourable conditions to aid the retention and increase in the use of the language. We support the availability of suitable opportunities to learn Welsh in those areas which historically had fewer Welsh speakers, whilst fostering the existing culture in other areas. This helps to sustain the cultural identity of rural areas in particular.

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.

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?

We have prepared an expanded response to Policy 10 of the NDF in a **separate** document: **PART 2: The NDF's Onshore Wind and Solar Assessment**

(This is to make in easier to read because.....

1. it is long
2. the tables and maps are not stable in the response form boxes
3. we have put much of the supporting information in Appendices).

The structure is below:

PART 2

The NDF's Onshore Wind and Solar Assessment

1. The renewables target
2. The Onshore Renewable Energy Technologies used in the NDF
3. 70% in 2030 - what does it mean and what does it involve?
4. The 15 'Priority Areas' (PAs)
5. The Rational Solution
6. Conclusion

Appendix 1.

Table: Application of Constraints: Arup vs Aecom methodology

Appendix 2.

Full Response to HRA ASSESSMENT OF dNDF

Appendix 3.

ERRORS, PROBLEMS & METHODOLOGY in the EVIDENCE
for ENERGY POLICY - in draft NDF 2019

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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