

# Agenda – Y Pwyllgor Newid Hinsawdd, Amgylchedd a Materion Gwledig

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Lleoliad:	I gael rhagor o wybodaeth cysylltwch a:
Ystafell Bwyllgora 3 – Y Senedd	Marc Wyn Jones
Dyddiad: Dydd Iau, 14 Tachwedd 2019	Clerc y Pwyllgor
Amser: 09.00	0300 200 6363
	<a href="mailto:SeneddNHAMG@cynulliad.cymru">SeneddNHAMG@cynulliad.cymru</a>

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## 1 Cyflwyniad, ymddiheuriadau, dirprwyon a datgan buddiannau (09.00)

## 2 Fframwaith Datblygu Cenedlaethol Drafft 2020–2040 – sesiwn dystiolaeth 5 – Ynni

(09.00–10.00)

(Tudalennau 1 – 26)

Will Ryan, Cyfarwyddwr, Cynllunio – Savills

Rhys Wyn Jones, Pennaeth – Renewable UK Cymru

Eleri Davies, Pennaeth Caniatâd y DU – Innogy Renewables UK Ltd.

Dogfennau atodol:

Briff Ymchwil

Papur – Savills (Saesneg yn unig)

Papur – Renewable UK

Papur – Innogy Renewables UK (Saesneg yn unig)



**3 Fframwaith Datblygu Cenedlaethol Drafft 2020–2040 – sesiwn dystiolaeth 6 – Bioamrywiaeth**

(10.00–11.00)

(Tudalennau 27 – 30)

James Byrne, Rheolwr Eiriolaeth Tirwedd – Ymddiriedolaeth Natur Cymru

Anthony Geddes, Rheolwr Cenedlaethol Cymru – Confor

Jerry Langford, Rheolwr Materion Cyhoeddus – Coed Cadw

Mike Wilkinson, Uwch Gynllunydd Cadwraeth – RSPB Cymru

Dogfennau atodol:

Papur – RSPB Cymru (Saesneg yn unig)

**4 Cynnig o dan Reol Sefydlog 17.42(vi) i benderfynu gwahardd y cyhoedd o weddill y cyfarfod**

**EGWYL 11.00 – 11.10**

**5 Fframwaith Datblygu Cenedlaethol Drafft 2020–2040 – Sesiwn friffio – PREIFAT**

(11.10–12.15)

Graeme Purves, Cynghorydd Arbenigol i'r Pwyllgor

**6 Trafod agwedd y Pwyllgor tuag at yr Ymchwiliad i dlodi tanwydd – PREIFAT**

(12.15–12.30)

(Tudalennau 31 – 35)

Dogfennau atodol:

Papur (Saesneg yn unig)

Mae cyfyngiadau ar y ddogfen hon

## 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.

31<sup>st</sup> October 2019.

## Tachwedd 2019

### Datganiad RenewableUK Cymru i'r pwyllgor Newid Hinsawdd, yr Amgylchedd a Materion Gwledig ynghylch y Fframwaith Datblygu Cenedlaethol drafft 2020-2040

#### Cyflwyniad

Mae Renewable UK Cymru (RUKC) yn rhan o Renewable UK ac mae'n gyfrifol am hwyluso amgylchedd polisi ynni adnewyddadwy lle gall ei aelodau weithredu, gan eu helpu i dyfu eu busnesau a darparu cyfleoedd dylanwadu a rhwydweithio.

Mae RUKC yn ddiolchgar i bwyllgor newid yn yr hinsawdd, yr amgylchedd a materion gwledig Cynulliad Cenedlaethol Cymru am ddarparu'r cyfle hwn i gyfrannu at graffu ar y Fframwaith Datblygu Cenedlaethol (FfDC). Mae RUKC wedi cyfyngu ei sylwadau i ddatblygu ynni adnewyddadwy gwynt ac solar ar raddfa fawr a phrosiectau ynni adnewyddadwy eraill, hy polisïau NDF 10-13.

#### 1. Datganiad RUKC ynghylch cwmpas ac uchelgais yr NDF

**1.1** Mae Cymru mewn sefyllfa wleidyddol, amgylcheddol a chymdeithasol wahanol i'r un a roddodd y cyd-destun i'r targedau a osododd ar gyfer cyflenwi a pherchnogi ynni adnewyddadwy yn 2017.<sup>1</sup>

**1.2** Mae'r FfDC yn genhedlaeth sy'n diffinio cyfle i roi fframwaith cynllunio newydd ar waith a all ddatgloi potensial Cymru 'i gwrdd â heriau'r argyfwng hinsawdd datganedig.

**1.3** Mae RUKC yn croesawu yn gyffredinol agwedd gadarnhaol Llywodraeth Cymru tuag at ynni adnewyddadwy a'r ymdrechion a wnaed i adlewyrchu hyn yn naratif a pholisïau'r FfDC, a grynhoir fel a ganlyn<sup>2</sup>: "Mae heriau newid yn yr hinsawdd yn galw am weithredu ar frys ar allyriadau carbon a rhaid i'r system gynllunio helpu Cymru i arwain y ffordd wrth hyrwyddo a darparu cymdeithas ddatgysylltiedig gystadleuol, gynaliadwy. Bydd ymrwymïadau a thargedau datgarboneiddio ac ynni adnewyddadwy yn cael eu trin fel cyfleoedd i adeiladu economi carbon isel mwy gwydn a theg, datblygu seilwaith trafndiaeth glân ac effeithlon, gwella iechyd y cyhoedd a chynhyrchu swyddi medrus mewn sectorau newydd."

**1.4** Mae RUKC yn gwerthfawrogi bod cyfyngiadau parhaus ar allu Llywodraeth Cymru i ddatblygu a rheoli dull cyfannol o ymdrin â'r agenda datgarboneiddio tra nad oes ganddi reolaeth lawn o hyd dros faterion fel trosglwyddo trydan a threfn brydlesu Ystâd y Goron ar gyfer datblygu ynni morol. Fodd bynnag, roedd cydberthynas system ynni'r DU yn amlwg yn ystod y digwyddiad Datgysylltu Galw Amlledd Isel diweddar ar Awst 9fed, 2019 lle cafodd miloedd lawer o gwsmeriaid o Gymru eu heffeithio dros dro.

**1.5** Mae hyn yn cefnogi safbwynt RUKC na ddylai'r FfDC fod yn 'dawel' ar y gefnogaeth sy'n ofynnol ar gyfer datblygu ynni adnewyddadwy arall a sut y gall y technolegau hyn gyfrannu at system ynni gydnherth a diogel o bosibl. Mae hyn yn cynnwys cyfeiriad at wynt alltraeth (a seilwaith ar y tir sy'n

<sup>1</sup> P.3 Electricity generation in Wales 2017, Welsh Government

<sup>2</sup> P.21, National Development Framework 2020-2040

gysylltiedig â datblygu gwynt ar y môr) a datblygu ynni a fydd yn hwyluso ynni adnewyddadwy, e.e. hydro wedi'i bwmpio

**1.6** Nid yw'r FfDC ychwaith yn darparu fframwaith gwneud penderfyniadau cadarn ar gyfer unrhyw fath arall o DNS nad yw'n gysylltiedig ag ynni e.e. datblygiad cysylltiedig â maes awyr, rheilffyrdd, priffyrdd.

**1.7** Mae RUKC yn ymwybodol o'r her o ddylunio polisi sy'n darparu cryn dipyn o anrhagweladwyedd economaidd a gwleidyddol yn y dyfodol agos a thros y tymor hwy. Fel y nodwyd yn Rhagair y Prif Weinidog, "Mae'n anodd dychmygu sut y gallai'r byd edrych yn 2040"<sup>3</sup>

**1.8** Mae RUKC yn credu y dylai Llywodraeth Cymru fynegi cyfeiriad teithio clir o ran safle Cymru 'yn y dyfodol fel allforiwr pŵer net yng nghyd-destun yr FfDC. Dylai hyn gynnwys ei ddadansoddiad o sut mae datgarboneiddio gwres a chludiant yn debygol o effeithio ar y galw am drydan adnewyddadwy. Gyda phwyslais polisi cynyddol ar fudd lleol, mae Cymru yn dal i elwa o gynnydd mewn trydan adnewyddadwy a gynhyrchir yn lleol, ond mae'r sefyllfa bolisi ar allforio trydan o ynni adnewyddadwy yn parhau i fod yn aneglur.

**1.9** Cred RUKC y byddai'r ddogfen ymgynghori hefyd wedi elwa o ddarparu rhywfaint o fewnwelediad i farn Llywodraeth Cymru o'r rhyngweithio yn y dyfodol rhwng y galw cynyddol disgwylidig sy'n deillio o ddatgarboneiddio gwresogi a thrafnidiaeth, yr angen am dechnolegau ynni adnewyddadwy cyflenwol a'r angen i uwchraddio'r trosglwyddiad trydan. a rhwydweithiau dosbarthu yn rhanbarthau Cymru a rhyngddynt. Mae RUKC yn awgrymu y dylai'r FfDC gydnabod yr angen tebygol am well seilwaith grid i gyflawni datgarboneiddio yn y dyfodol.

**1.10** At hynny, nid yw'r FfDC yn ystyried fawr ddim yr her enfawr i ddatgarboneiddio gwres y tu hwnt i sefydlu Rhwydweithiau Gwres Dosbarth ac i gynnig cefnogaeth "lle bynnag y maent yn hyfyw"<sup>4</sup>. Gellid bod wedi rhoi mwy o ystyriaeth i fap ffordd datgarboneiddio lle gallai fod angen i drydaneiddio gwresogi a chludiant ac ail-bwrpasu'r rhwydwaith dosbarthu nwy chwarae rolau strategol wrth ddarparu datrysiad 'stryd wrth stryd' i ddatgarboneiddio.

**1.11** I grynhoi, mae RUKC yn credu nad oes gan yr FfDC weledigaeth strategol uno ar gyfer system ynni Cymru 'yn y dyfodol. Gellid bod wedi sicrhau mwy o gydbwysedd rhwng cynnig dulliau polisi penodol ar gyfer technolegau penodol a chynnig golwg fwy cydlynol ar sut y bydd angen i'r system ynni ddarparu ar gyfer gwres a chludiant datgarboneiddio.

## **2. Datganiad RUKC ar gynigion polisi NDF ar gyfer Ynni Adnewyddadwy**

**2.1** Mae RUKC yn cydnabod bod uchelgais a chwmpas yr FfDC yn cynrychioli newid sylweddol o'r Nodyn Cyngor Technegol 8 sy'n mynd allan 'Cynllunio ar gyfer Ynni Adnewyddadwy' (Gorffennaf 2005) (TAN8). Cyfyngodd TAN8 gyfleoedd i ddatblygu prosiectau > 25MW yn bennaf i'r Ardaloedd Chwilio Strategol (SSAs) a darparodd gyfleoedd cyfyngedig ar gyfer prosiectau 5-25MW, ond mae'r FfDC yn rhagweld y bydd prosiectau ynni adnewyddadwy ar raddfa fawr (> 10MW) yn cael eu hystyried ym mhob ardal y tu allan i'r rhai sydd â rhai arbennig dynodiadau. Mae RUKC yn croesawu hyn.

**2.2** Cred RUKC y dylai'r geiriad polisi a amlinellir ym mholisi 10 fod yn berthnasol i bob ardal y tu allan i NPs ac AHNE (hy y rhai a ddiffinnir ar hyn o bryd fel yr ardaloedd 'coch' o fewn dull 'goleuadau

<sup>3</sup> P.4 National Development Framework 2020-2040

<sup>4</sup> NDF, P.43

traffig' arfaethedig Llywodraeth Cymru)<sup>5</sup>, trwy gymhwysu meini prawf priodol. dull seiliedig. Mae dadansoddiad RUKC yn dangos y bydd yn rhaid i gyfran sylweddol, os nad mwyafrif y datblygiad ddod o ardaloedd y tu allan i'r Ardaloedd a Ffefrir a ddiffinnir ar hyn o bryd.

**2.3** Nid yw RUKC yn eiriol dros 'carte blanche' ar gyfer datblygu. Mae'n annhebygol iawn y byddai unrhyw ddatblygwr yn ceisio sefydlu prosiect mewn meysydd sy'n cario, er enghraifft, Safle o Ddiddordeb Gwyddonol Arbennig (SSSI), Ardal Cadwraeth Arbennig (ACA) neu Ardal Amddiffyn Arbennig (SPA). Yn hytrach, mae RUKC yn ffafrio polisi synhwyrol sy'n seiliedig ar feini prawf y mae ei ethos â rhagdybiaeth o blaid newid tirwedd mewn ardaloedd y tu allan i'r rhai sydd â dynodiadau arbennig. Byddai hyn yn ymddangos yn fwy cydnaws â'r newid sylweddol sy'n ofynnol i gwrdd â her yr argyfwng hinsawdd datganedig a'r uchelgais sero net. Dyma hefyd y dull a awgrymir gan Bolisi Cynllunio Cymru:

“Dylai awdurdodau cynllunio roi pwys sylweddol ar dargedau Llywodraeth Cymru i gynyddu cynhyrchu ynni adnewyddadwy a charbon isel, fel rhan o'n dull cyffredinol o fynd i'r afael â newid yn yr hinsawdd a chynyddu diogelwch ynni. Mewn amgylchiadau lle mae tirwedd warchoddedig, bioamrywiaeth a dynodiadau ac adeiladau hanesyddol yn cael eu hystyried yn y broses benderfynu, dim ond yr effeithiau anadferadwy uniongyrchol ar safleoedd ac adeiladau a ddiogelir yn statudol a'u lleoliadau (lle bo hynny'n briodol) y dylid eu hystyried. Ymhob achos, dylid rhoi cryn bwys ar yr angen i gynhyrchu mwy o ynni o ffynonellau adnewyddadwy a charbon isel, er mwyn i Gymru gyrraedd ei thargedau carbon ac adnewyddadwy.<sup>6</sup>”

**2.4** Mae RUKC wedi dadlau'n gyson na ddylai 'llinellau ar fapiau' fod yn sail i iteriadau dilynol o bolisi cynllunio yn dilyn TAN8. Fe wnaeth y model SSA yn TAN8 ennyn cryn ewyllys mewn cymunedau lleol ac awdurdodau cynnal yr oedd newid tirwedd ar eu cyfer, o ran prosiectau ynni adnewyddadwy a'u cysylltiadau grid cysylltiedig, yn cael eu hystyried yn 'fait accompli', gan danio gwrthwynebiad annirnadwy eisoes i ynni adnewyddadwy. datblygiad (gwynt ar y tir). Mae'n resyn felly nad yw'n ymddangos bod barn y diwydiant sy'n ymwneud â'r model 'meysydd blaenoriaeth' arfaethedig wedi cael ei hystyried.

### **3. Datganiad RUKC ar y meysydd blaenoriaeth arfaethedig ar gyfer datblygu ynni adnewyddadwy.**

**3.1** Cynhaliodd RUKC ymarfer mapio i sefydlu'r cyfle y gellir ei ddatblygu yn debygol (% yr ardal heb gyfyngiadau) o'r 11 maes blaenoriaeth a nodwyd fel meysydd blaenoriaeth 'gwynt yn unig'. (h.y. roedd yn eithrio meysydd blaenoriaeth 2, 4, 12 a 13 sydd wedi'u dynodi'n feysydd blaenoriaeth 'solar yn unig').

**3.2** Mae RUKC wedi ymgysylltu â chydweithwyr yn y sector ynni adnewyddadwy solar a'r Gymdeithas Masnach Solar (STA). Ei ddealltwriaeth yw y bydd yr STA yn ymgysylltu â'r FfDC ac yn darparu ei farn yn annibynnol.

**3.3** Yn ôl dadansoddiad RUKC, mae cyfanswm arwynebedd y cyfle y gellir ei ddatblygu (heb gyfyngiadau) ar gyfer yr 11 ardal flaenoriaeth sy'n ymwneud â gwynt ar y tir yn cyfateb i oddeutu 5%.

<sup>5</sup> NDF, P.43

<sup>6</sup> Planning Policy Wales(v.10) Section 5.9.17

Yn yr ardaloedd hyn, mae'n debygol y byddai'r mwyafrif helaeth o gyfleoedd y gellir eu datblygu yn ymwneud â safleoedd â llai na 10MW, ac felly nid o fewn cylch gwaith yr NDF.

**3.4** Mae RUKC yn cynnal ymarfer mapio pellach gan gymhwyso dull meini prawf o ddatblygu prosiectau gwynt ar y tir (yn hytrach na'r dull 'ardal flaenoriaeth'). Y pwrpas yw sefydlu i ba raddau y byddai'r dull hwn yn darparu maes mwy o gyfle y gellir ei ddatblygu a chodiad cymesur yn y capasiti posibl ar gyfer gwynt ar y tir.

**3.5** N.B. Bydd dadansoddiad manwl RUKC o'r meysydd blaenoriaeth a chanlyniadau ei ymarferion mapio, gan gynnwys y cyfyngiadau / meini prawf y mae wedi'u defnyddio er mwyn cynhyrchu ei ganlyniadau, yn cael eu cyflwyno fel rhan o'i ymateb ymgynghori ffurfiol i Lywodraeth Cymru.

**3.6** Ar gyfer y ddau ymarfer, bydd yn bwysig nodi ei bod yn annhebygol y bydd y gallu dangosol potensial y gellir ei ddatblygu (MWs) mewn ardal yn golygu hy byddai cyflawni lefel benodol o gapasiti MW mewn ardal yn debygol o fod angen gallu llawer uwch y gellir ei ddatblygu.

**3.7** Felly, barn RUKC yw bod y meysydd blaenoriaeth fel y'u drafftwyd yn annhebygol iawn o fod yn addas at y diben naill ai mewn perthynas â'r uchelgais a nodir yng nghanlyniad 11 yr FfDC (gweler uchod 1.3) neu yng nghyd-destun Pwyllgor y DU ar Newid Hinsawdd barn cwrdd â her netzero:

“Gallai cynhyrchu adnewyddadwy fod bedair gwaith heddiw, gan ofyn am adeiladu parhaus a chynyddol rhwng nawr a 2050, wedi'i ategu gan opsiynau pŵer carbon isel cadarn fel pŵer niwclear a dal a storio carbon (wedi'i gymhwyso i fiomas neu blanhigion sy'n llosgi nwy)”<sup>7</sup>

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

Mae cyfyngiadau ar y ddogfen hon



## 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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