

1. Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal? If so, what do you think would be the most appropriate means of testing public support, and when should it take place? If you do not agree with the need for such a test, please explain why?

Agree. The public need to be informed comprehensively about the proposal before they reach a firm conclusion of support or objection is imperative. There remains some uncertainty in the process about how a Representative Authority would engage with the public and how a firm conclusion of support or objection could be reached. There is no mention of National Park Authorities at all in the process. As they are Planning Authorities they may have to determine planning applications associated with a GDF and the planning decision making process regarding GDF is uncertain in Wales. It is important that their role is therefore recognised and included in the process in a meaningful manner.

The definition of community, its size and influence is also somewhat vague but this should be open to discussion and interpretation depending on the area and agreement between parties. The size of the “community” may extend to the geographical area of the Representative Authority i.e. a County Council in Wales. It is recognised however that unanimous public support over a wider geographical area would be difficult to obtain.

Early engagement and the dissemination of detailed information will be vital as stated in the consultation document.

2. Do you agree with the proposed amendments to decision making within the MRWS siting process? If not, how would you modify the proposed phased approach, or, alternatively, what different approach would you propose? Please explain your reasoning

Yes provided sufficient information has been obtained and appropriate community engagement as stated in the consultation.

3. Do you agree with this approach to revising roles in the siting process set out in the White Paper? If not, what alternative approach would you propose and why?

Yes they appear logical. However sites that may be put forward within designated landscapes, for example National Parks, should be assessed against current national policy and discounted at an early stage if other sites have been put forward in unprotected landscapes. The role of National Parks in relation to the “representative authority” which would be the County Council is unclear as stated in response to question 1. It is suggested that the representative authority would need the full support of a National Park before a site is given formal community support, and in its absence a site could not be endorsed and moved forward to the siting process stage.

4. Do you agree with this proposed approach to assessing geological suitability as part of the MRWS siting process? If not, what alternative approach would you

propose and why?

Agree

5.Do you agree with this proposed approach to planning for a GDF? If not, what alternative approach would you propose and why?

There remains uncertainty about what might happen in Wales. As GDF decision making is a devolved issue any planning decisions should/will be taken within Wales. The likely scenario at this stage, without changes in legislation, is that a planning application would be called in by the Welsh government for determination due to national significance. The National Park would strongly support the final planning decision making process to remain a Welsh government responsibility but clearly there is a need for dialogue with the UK government to avoid repetition and potentially unsuitable areas from being considered seriously from the outset.

Questions 6 to 9.

General agreement with these questions provided community benefits are not put forward as a form of bribe to accept an inappropriate site. The benefits should be long lasting and applicable to the geographic area of the responsible authority and any other adjoining areas that may be impacted by the proposal.

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