

RWE

GREEN HYDROGEN PRO- JECT: A PEMBROKE NET ZERO CENTRE PROJECT

Chapter 3: Need and Alternatives Considered



Glossary

Term	Definition
CO2	Carbon Dioxide
DBEIS	Department for Business, Energy and Industrial Strategy
DESNZ	Department for Energy Security and Net Zero
EIA	Environmental Impact Assessment
ES	Environmental Statement
FES	Future Energy Scenarios
GW	Gigawatt
GVA	Gross Value Added
Hr	Hour
IEA	International Energy Agency
LDP	Local Development Plan
Mt	Million Tonnes
MUST	Multi-Utility Service Transit
MW	Megawatt
NPS	National Policy Statement
PCC	Pembrokeshire County Council
PDAS	Planning Design and Access Statement
PNZC	Pembroke Net Zero Centre
PPW	Planning Policy Wales
SAC	Special Area of Conservation
SSSI	Special Site of Scientific Interest
SWIC	South Wales Industrial Cluster
TAN	Technical Advice Note
Te	Tonne
WG	Welsh Government

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3 NEED AND ALTERNATIVES CONSIDERED

Introduction

- 3.1. This chapter of the Environmental Statement (ES) provides a summary of the need for the Proposed Development and a description of the reasonable alternatives considered by the Applicant during the evolution of the Proposed Development and through the Environmental Impact Assessment (EIA) process.
- 3.2. It includes a summary of the reasons for the selection of the Development Site, together with a description of the alternative design and layout options that have been considered. Further information is provided in the Planning, Design and Access Statement (PDAS) that accompanies the planning application.

Need for the Development

- 3.3. The need for the Proposed Development stems from two sources:
 - Energy security in the context of increasing demand for electricity
 - The need to decarbonise energy systems and combat the potentially devastating effects of climate change on current and future generations.
- 3.4. The Proposed Development will provide a source of green energy, helping to reduce carbon emissions and contribute to Wales' net-zero goals and once operational, will reduce reliance on imported fossil fuel energy sources, providing greater energy security at a national scale.
- 3.5. Consideration of need, having regard to the relevant national and local policy context, is provided below.

National Grid Future Energy Scenarios (July 2023)

- 3.6. 'Future Energy Scenarios' (FES) (National Grid, 2023) outlines different credible pathways for the future of energy for the next 30 years and beyond. The document considers how much energy is needed and where the energy could come from. In all scenarios, the demand for electricity increases; this is brought about by shifting away from high carbon fuels to hit the Government's net-zero emissions target by 2050 and the predicted increase in electric vehicles ahead of the 2035 ban on petrol/diesel driven vehicles.
- 3.7. For electricity supply, in all scenarios, there are significant increases in renewable energy generation. The key messages of the FES report, with regards to the Proposed Development, include:

- Significant investment in low carbon electricity generation (including Hydrogen fuel) will be required across all net zero pathways
- Hydrogen production is forecast to develop within industrial clusters and industrial consumers are expected to switch to use Hydrogen by the 2030s across all net zero pathways.

3.8. National Grid anticipates annual electricity demand in the UK could more than double from 286TWh in 2022 to up to 726TWh by 2050. Similarly, peak demand in 2022 of 58GW could almost double to up to 114GW over the same period.

3.9. There is, therefore, an urgent need to increase electricity capacity in the UK to ensure a secure and stable supply in the future and achieve renewable energy and net zero targets.

Welsh Government Declaration of Climate Emergency

3.10. On 29 April 2019, the then Environment Minister, Lesley Griffiths, declared a climate emergency in Wales on behalf of the Welsh Government (WG)¹.

Welsh Government Commitment to Net Zero by 2050

3.11. On 9 February 2021, the WG set out its legal commitment to achieve net zero emissions by 2050².

UK Government Commitment to Net Zero by 2050

3.12. On 27 June 2019, the UK became the first major economy in the world to pass laws to end its contribution to global warming by 2050³. The target will require the UK to bring all greenhouse gas emissions to 'net zero' by 2050, compared with the previous target set within the Climate Change Act (2008) of at least an 80% reduction of emissions by 2050 (against the 1990 baseline). In support of this target, the Energy White Paper: Powering our Net Zero Future (DBEIS, 2020a) was published, setting out the pathway to achieving net zero through greater reliance on solar and wind energy.

3.13. Net Zero 2050 – A Roadmap for the Global Energy Sector (International Energy Agency (IEA), 2021) outlines the essential conditions for the global energy sector to reach net-zero carbon dioxide (CO₂) emissions by 2050. The Roadmap calls for scaling up clean energy technologies during the 2020s, reaching up 520 Mt low-carbon hydrogen production by 2050 from 9 Mt in 2020.

¹ <https://www.gov.wales/welsh-government-makes-climate-emergency-declaration>

² <https://www.gov.wales/wales-commits-net-zero-2050-sets-out-ambitions-get-there-sooner>

³ UK becomes first major economy to pass net zero emissions law', BEIS, June 2019; Climate Change Act 2008 (2050 Target Amendment) Order 2019.

- 3.14. The Roadmap stresses that rolling out electrolysers at pace is required to achieve these targets.

Overarching National Policy Statement for Energy (EN-1)

- 3.15. The Department for Energy Security and Net Zero (DESNZ) National Policy Statement (NPS) EN-1 sets out national policy for energy infrastructure. It has effect for the decisions by the Secretary of State on applications for energy developments that are nationally significant under the Planning Act 2008. NPS EN-1 is therefore not directly relevant to applications made to the relevant Local Planning Authority under the Town and Country Planning Act 1990.
- 3.16. NPS EN-1 does, however, have relevance to the Proposed Development in terms of recognition of the role of green hydrogen production in securing reliable, clean energy to meet UK clean energy targets:

“We need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses. This includes increasing our supply of clean energy from renewables, nuclear and hydrogen manufactured using low carbon processes²⁷ (low carbon hydrogen), and, where we still emit carbon, developing the industry and infrastructure to capture, transport and store it.” (Paragraph 2.3.6)

Footnote 27: “This includes production of both green hydrogen (through water electrolysis with low carbon power) and blue hydrogen (through methane reformation with Carbon Capture and Storage”

UK Government’s Hydrogen Strategy

- 3.17. Low carbon Hydrogen will be critical for meeting the UK’s legally binding commitment to achieve net zero by 2050, and Carbon Budget Six in the mid-2030s. Hydrogen can support the decarbonisation of the UK economy, particularly in ‘hard to electrify’ UK industrial sectors, and can provide greener, flexible energy across power, heat and transport. The UK’s geography, geology, infrastructure and expertise make it particularly suited to rapidly developing a low carbon hydrogen economy, with the potential to become a global leader on hydrogen and secure economic opportunities across the UK.
- 3.18. The UK Hydrogen Strategy set out commitments and actions to drive progress in the 2020s towards delivering a target of 5GW production capacity by 2030, with potential for rapid expansion post-2030. Modelling suggested that the use of low carbon Hydrogen enabled by 5GW production capacity could deliver total emissions savings of around 41MtCO₂e between 2023 and 2032, equivalent to the carbon captured by 700 million trees over the same time.
- 3.19. Notwithstanding the ambitions set out in the UK Government’s Hydrogen Strategy, targets for Hydrogen production capacity have since been updated.

British Energy Security Strategy 2022

- 3.20. The British Energy Security Strategy was published in April 2022 and provides a strategy to accelerate progress towards Net Zero. The Strategy envisages that by 2030, 95 per cent of British electricity could be low-carbon and by 2035, the electricity system could be fully decarbonised.
- 3.21. With respect of Hydrogen, the Strategy recognises that the UK has virtually no low-carbon Hydrogen in our system – but that technology is making this a near-term reality with vast potential applications. It continues to commit to doubling the UK ambition for Hydrogen production to up to 10GW by 2030, with at least half of this from electrolytic Hydrogen. It recognises that by efficiently using our surplus renewable power to make Hydrogen, we will reduce electricity system costs.

Powering Up Britain – Energy Security Plan 2023

- 3.22. The Powering Up Britain – Energy Security Plan was published in March 2023 and confirms the UK Government sees low-carbon Hydrogen as a critical component of its broader strategy to deliver energy security, create economic growth and contribute to our net zero target. It reiterates the ambition to have up to 10GW of low-carbon Hydrogen production capacity in the UK by 2030, subject to affordability and value for money, with at least half from electrolytic Hydrogen.

National Planning Policy Context

- 3.23. Planning Policy Wales, Edition 12 published February 2024 (PPW), Future Wales - the National Plan 2040, published February 2021 (Future Wales) and Technical Advice Notes (TANs) set out the national planning policies of WG. Following the publication of Future Wales, TAN 8: Planning for Renewable Energy has been revoked and there is no longer an energy-specific TAN.
- 3.24. PPW paragraph 5.7.14 confirms that Welsh Government targets for the generation of renewable energy are:
- Wales to generate 70% of its electricity consumption from renewable energy by 2030
 - One Gigawatt of renewable electricity capacity in Wales to be locally owned by 2030
 - New renewable energy projects to have at least an element of local ownership
- 3.25. It is noted that it is vital that we reduce our emissions to protect our own wellbeing and to demonstrate our global responsibility. Future Wales together with PPW seek to ensure the planning system focuses on delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use and how we live and travel.

- 3.26. PPW recognises that the future energy supply mix will depend on a range of established and emerging low carbon technologies, including green hydrogen.
- 3.27. Regarding energy generation, Future Wales identifies that Wales can become a world leader in renewable energy technologies and recognises the wealth of current and emerging renewable energy technologies can contribute towards energy and decarbonisation targets. WG's support for both large and community scaled projects and commitment to ensuring the planning system provides a strong lead for renewable energy development means it is well placed to support the renewable sector, attract new investment and reduce carbon emissions.
- 3.28. Future Wales Policy 17 is of specific relevance to the Proposed Development:
- Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure – expresses strong support for the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. The policy states that in determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency.*
- 3.29. In respect of Hydrogen production, Policy 17 states that all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment. It also expects proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities.

Local Policy Context

- 3.30. The Development Plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 is the Pembrokeshire County Council (PCC) Local Development Plan (LDP), adopted February 2013.
- 3.31. Policy SP 2 (Port and Energy Related Development) permits development of the Port of Milford Haven (extending over the Development Site Boundary) for energy related development. Policy GN 4 (Resource Efficiency and Renewable and Low-carbon Energy Proposals) supports developments which enable the supply of renewable energy through environmentally acceptable solutions.

Overall Need

- 3.32. Overall, there is a significant need to increase clean energy supply based on predictions of future consumption due to electrification of transportation and heating in particular.

- 3.33. Given the climate emergency, there is a need for energy to be produced from zero or near zero carbon and greenhouse gas emission sources.
- 3.34. Green Hydrogen, and other sources of renewable energy, have an important role to play as part of the mix of energy sources required to meet increasing electricity demand in the future and national carbon and greenhouse gas reduction targets, in particular the Welsh and UK Government's legally binding targets of net zero carbon emissions by 2050.

Alternatives Considered

- 3.35. The EIA Regulations 17 3(d) require that an ES should include:

'A description of the reasonable alternatives studied by the applicant..., which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the significant effects of the development on the environment.'

- 3.36. Paragraph 2 of Schedule 4 of the Regulations expands slightly on the information for inclusion in environmental statements and states:

'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the applicant..., which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.' (Schedule 4 (2))

- 3.37. This section therefore sets out the key reasons for the selection of the Development Site and current layout, taking into account environmental effects.

'Do nothing' scenario

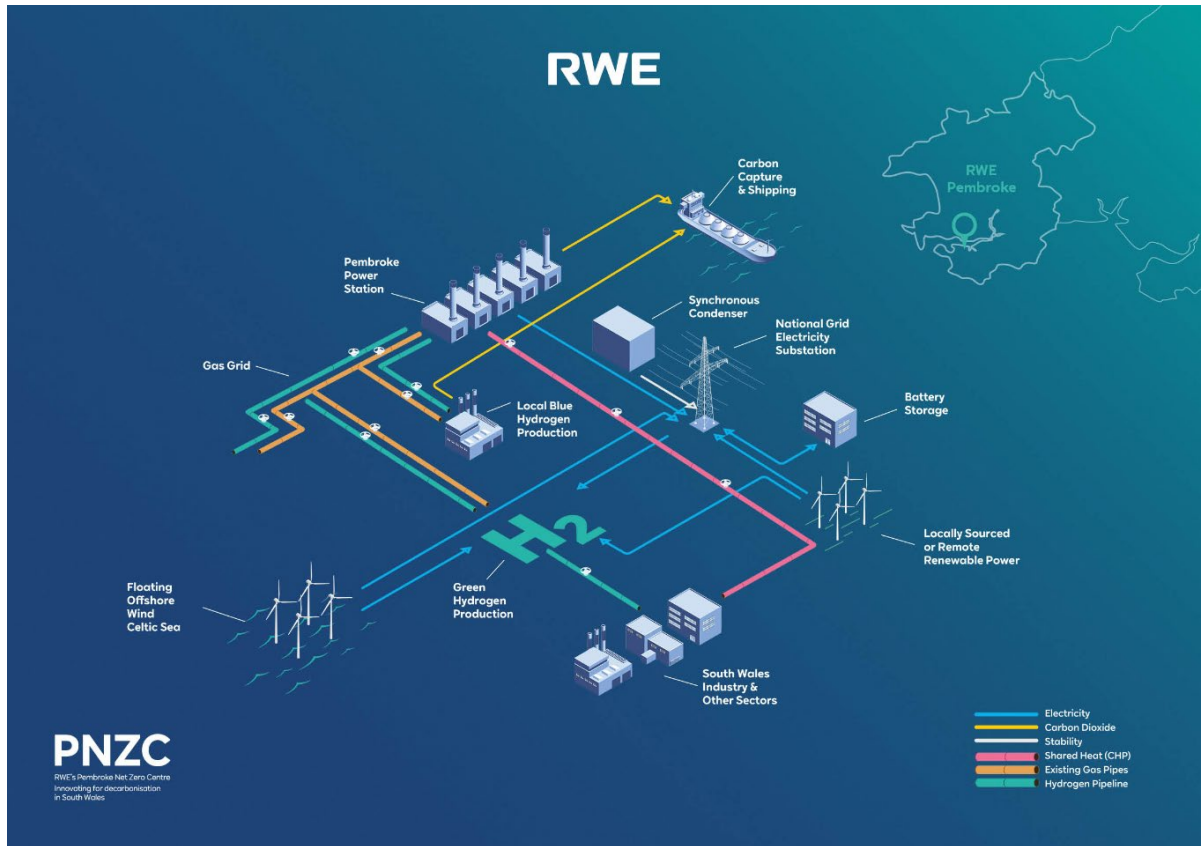
- 3.38. Under the 'Do nothing' scenario, the Development Site would continue to be underutilised. The benefits of producing green Hydrogen Gas to provide a clean energy source for local industry and help the Welsh and UK Governments to respond to energy security needs, the climate emergency and reach greenhouse gas reduction and net zero targets by 2050 would not be contributed towards in this scenario.
- 3.39. The existing semi-improved grassland would remain in-situ and would continue to be unmanaged. The habitat value of the Development Site would remain as-is under this scenario.
- 3.40. The Proposed Development would result in ecological benefits through the implementation of biodiversity enhancements via a Green Infrastructure Strategy. Through creation of proposed habitat corridors across the wider PNZC area and commitment to ecological enhancement through specified planting and management regimes, the habitat

value of the wider PNZC would be improved. Improving wildlife corridor connectivity across the wider PNZC landholding would also provide habitat enhancement. Under the 'Do-nothing' scenario, these benefits would not be achieved.

Site Location

- 3.41. The Proposed Development is located adjacent to the existing operational Pembroke Power Station. Over the last 60 years, the site has been used for power generation from initially an oil-fired power station in the 1960s (Pembroke A Power Station), to later in the 2010s a new, highly efficient natural gas-fired power station (Pembroke Power Station) that continues to produce the lowest CO₂ intensity power of any gas plant in the UK.
- 3.42. RWE recognises that its pathway to neutrality will require wide-scale investment in the decarbonisation technologies. 'The Pembroke Net Zero Centre' (PNZC) initiative seeks to drive decarbonisation at the existing Power Station through development of a network of low-carbon technologies.
- 3.43. Located all in one place, the PNZC demonstrates RWE's commitment to the decarbonisation of Wales and the UK. PNZC will develop and implement four distinctive pillars:
1. Decarbonisation of Pembroke Power Station, including carbon capture and storage feasibility studies and investigating burning hydrogen in the Power Station instead of natural gas
 2. Green Hydrogen production, including feasibility studies for an initial 100-300 MW 'pathfinder' electrolyser on the Pembroke site whilst also looking at GW-scale opportunities
 3. Floating Offshore Wind development in the Celtic Sea
 4. Feasibility of a Multi-Utility Service Transit (MUST) infrastructure project connecting industry across the Milford Haven Waterway
- 3.44. The PNZC will help unlock the route to Net Zero in Wales, and help secure the future of existing industry, businesses and jobs, as well as providing a significant boost to the local economy. Early analysis by Cardiff Business School indicates that PNZC could support up to around 1,500-2,200 Welsh jobs per annum during construction and boost regional Gross Value Added (GVA) by up to £70-100m p.a. During operation, by 2040 per annum PNZC could support circa 270-340 Welsh jobs and add £28-35m GVA to the regional economy. This is in addition to the 270 Welsh jobs and £28m GVA supported by the existing Pembroke Power Station in the longer-term.

Plate 1: PNZC Vision



Site Selection

- 3.45. The PNZC forms part of the South Wales Industrial Cluster (SWIC) and will provide a local decarbonisation hub, located at RWE’s existing Pembroke Power Station. RWE undertakes continuous assessments of land opportunities but, for schemes to progress, this must be where land is available in agreement with landowners’ commitments to supporting the production of green energy to meet a sustainable future.
- 3.46. In assessing the suitability of potential alternative sites, the following criteria are considered:
1. Technical suitability of the site for construction and operation
 - a. Topography and ground conditions
 - b. Size
 - c. Accessibility
 2. Grid connection feasibility (i.e. to reduce the land-take required for the Cable Corridor)

- a. Proximity of nearest point of connection
 - b. Availability of grid capacity at the substation
 - c. Accessibility substation to connect to via cables
- 3. Utilities connections availability**
- a. Proximity to available water connections to provide water to the Electrolyser
 - b. Proximity to off-taker (i.e. to reduce the land-take required for the Hydrogen Gas Pipeline Corridor)
- 4. Planning constraints**
- a. Planning designations, both national and local level
 - b. Existing land use
 - c. Landscape designations
 - d. Ecological designation
 - e. Heritage designations
 - f. Flood risk
 - g. Neighbouring land uses
 - h. Potential visual receptors
 - i. Presence of Best and Most Versatile (BMV) Agricultural Land
- 5. Site Availability**

3.47. In addition, there is an area of land which is covered by the Section 36 consent for the existing Pembroke Power Station which is reserved for carbon capture by a condition imposed on the consent. This land can only be released from that requirement by exception following DESNZ approval. As a result, this land was excluded from the alternative site assessment.

3.48. RWE has undertaken extensive alternative site assessment in the selection of the Development Site for the Proposed Development. In undertaking the alternative site assessment, the above criteria have been applied. On completion of this site assessment, there were two other alternative sites which were identified and taken through to the feasibility stage – one at the location of the PNZC Synchronous Condenser (Plate 2 below) and one further west of the Development Site, closer to the Valero Refinery (Plate 3 below).

Plate 2: Alternative Site 1 – Location of PNZC Synchronous Condenser

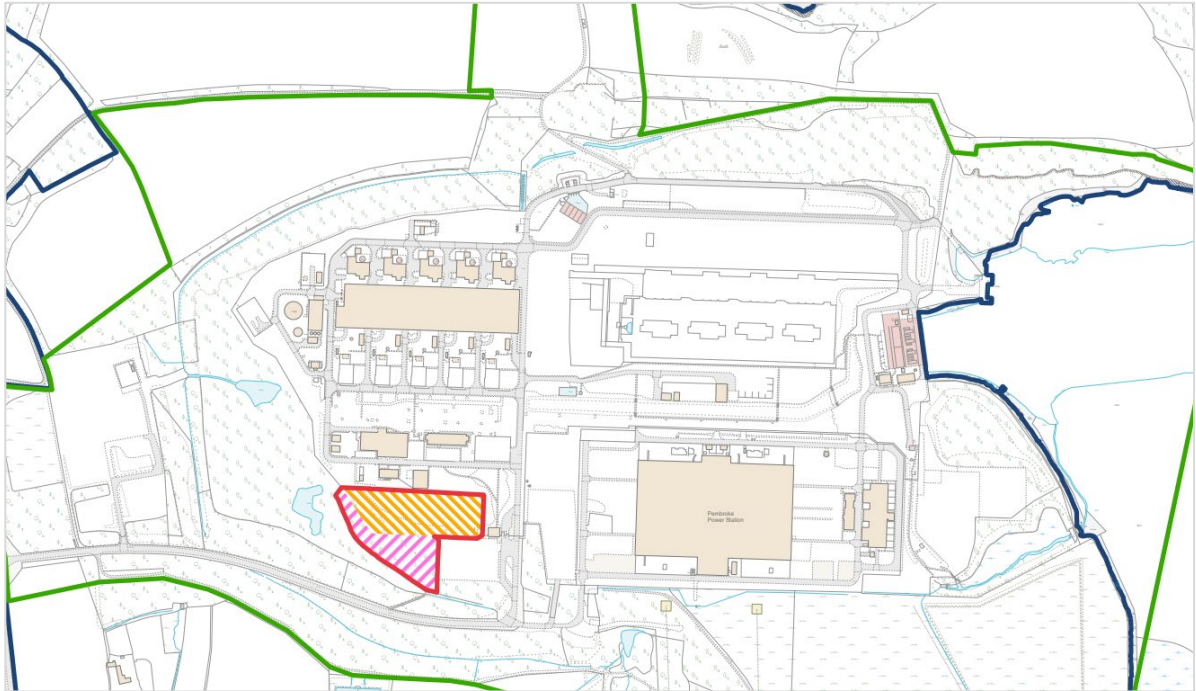


Plate 3: Alternative Site 2 – Site adjacent to Valero Refinery



3.49. Alternative Site 1 was discounted due to lack on an appropriate access to accommodate both the construction and operation of the Proposed Development as well as the lack of plot space to accommodate the Electrolyser and associated infrastructure. Alternative Site 2 was discounted due to the distance from the utilities connections at the Pembroke Power Station which would result in the need for a new utilities supply to be provided, which would have resulted in the need for a greater quantum of development. This site

also contains best and most versatile agricultural land. Both sites were therefore discounted at feasibility stage.

3.50. The final Development Site was selected for a number of reasons. It comprises brownfield land, located next to the existing Pembroke Power Station and will contribute to the PNZC and ultimately the SWIC. The Development Site is well screened by existing dense scrub and scrubby woodland boundary landscaping allowing considerable screening from local views and limiting wider landscape and visual impact. In addition, the transport network and access routes to the Development Site are suitable to allow the construction of the Proposed Development.

3.51. The Development Site was selected for a number of reasons:

- It comprises operational, brownfield land, previously used by Pembroke A power station and next to the existing Power Station and will contribute to the PNZC and ultimately the SWIC.
- It is well screened by existing dense scrub and scrubby woodland boundary landscaping allowing considerable screening from local views and limiting wider landscape and visual impact.
- The transport network and access routes to the Development Site are suitable to allow the construction of the Proposed Development.
- The Development Site is optimally located within proximity to both the off-taker site as well as the National Grid substation and the Pembroke Power Station water supply, reducing the amount of land-take required.

Site Layout and Design

3.52. An evaluation of site constraints and opportunities was undertaken to inform an initial concept design. This has subsequently been refined through a combination of technical assessments and engagement with various stakeholders. As a result, the Proposed Development presents an opportunity to provide the following:

- Approximately 2 te/hr green hydrogen for third party uses in support of the Government's Net Zero targets
- Provide areas of habitat enhancement.

3.53. Constraining factors that affected the layout and design include:

- The Pembrokeshire Marine/Sir Benfro Forol Special Area of Conservation (SAC) approximately 100m to the north of the Development Site Boundary at the nearest point
- The Milford Haven Site of Special Scientific Interest (SSSI) approximately 100m to the north of the Development Site Boundary at the nearest point

- Several listed buildings and 3no. Scheduled Monuments within 2km of the Development Site
- The South Wales Coastal Path running along the western boundary of the Development Site
- Existing above ground installation (AGI) in the north-east corner of the Main Electrolyser Area
- The existing natural gas pipeline which runs from the AGI to the Valero Refinery.

3.54. The EIA process has influenced the iterative design process of the Proposed Development, through the identification of the above constraints, responses to consultation undertaken to date, and identification of environmental effects. Therefore, there have been a number of iterations and refinements to the layout of the Proposed Development. These design iterations can be inspected in the accompanying PDAS which has been submitted with this application and are summarised below.

First Design Iteration

3.55. The initial Indicative Development Site Layout Plan was produced and considered by RWE prior to July 2023 when it was issued to PCC as part of the screening process. This layout took into account the constraints listed above and consisted of a concept plan which identified broadly the areas of the Development Site to be utilised for the Electrolyser Area, the Hydrogen pipeline Corridor, laydown areas and areas for connections into Pembroke Power Station.

Second Design Iteration

3.56. Following consultation with PCC a second iteration was developed which identified a specific arrangement of components on-site, including identification of the electrolyser building, flare stack and other associated equipment. This layout was used to inform the EIA Scoping Opinion Request issued to PCC in December 2023.

3.57. In this iteration, land for connection into the National Grid substation was identified.

Third Design Iteration

3.58. This iteration took into consideration safety buffers required between elements of the Proposed Development and users of the adjacent PROWs. It also took into consideration buffers requires to accommodate the Landscaping Strategy within the Main Electrolyser Area.

Current Layout

3.59. The Indicative Proposed Development layout is provided in **Figure 2.2** of this ES. The Indicative Development Site Layout Plan has considered the recommendations of the various environmental assessments which have been undertaken to inform the design

evolution, including the Landscape and Visual Impact Assessment (LVIA) (ES Chapter 6), the Ecological Impact Assessment (ES Chapter 7), the Conceptual Drainage Strategy (ES **Appendix 2.3**), the Cultural Heritage Desk Based Assessment (ES **Appendix 4.2**), the Preliminary Risk Assessment and Ground Investigation Report (ES **Appendix 4.3** and **Appendix 4.4**) and the Noise Impact Assessment (ES **Appendix 4.5**).

- 3.60. The key parameters of the Proposed Development have been identified and included as part of this assessment. Any future design evolution will remain within the parameters detailed in this ES, and therefore, the final detailed design will remain to be sufficiently evaluated as part of this assessment.

References

Planning and Compulsory Purchase Act 2004

Climate Change Act (2008)

The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017

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