

Consultation Response Form

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Preferred contact details (email/phone/post)	
<u>Organisation</u>	Institute of Welsh Affairs

The Institute of Welsh Affairs is a think tank and charity, independent of government and political parties. We bring together experts from all backgrounds, we conceive ambitious and informed ideas which secure political commitments to improve our democracy, public services and economy. We provide platforms for debate, opportunities for people to make their voices heard and agenda-setting research.

In 2019, we completed our three year *Re-energising Wales* project, and published *A plan for Wales' renewable energy future: Essential actions to re-energise Wales by 2035* report outlines a 10 point plan for a renewable Wales, drawing on evidence from previous [IWA Re-energising Wales reports](#).

Much of our response to the National Development Framework set out below draws on the research undertaken during *Re-energising Wales*. The [full report](#) and supporting research is available on our website: https://www.iwa.wales/wp-content/uploads/2019/03/IWA_Energy_WP6_Digital-2.pdf

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

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

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

We believe Outcome 5 should be widened to include villages and smaller towns, especially if a robust action plan for 'world class' digital connectivity is to deliver benefits fairly to all of Wales. Such a plan would also support the roll out of smart homes, EV deployment and elements of local and community energy.

Otherwise the NDF could read as an urban-focused document that undervalues rural Wales. This concern is reinforced by the implication that rural Wales exists to provide for urban Wales i.e. – "Rural areas have an important function as providers of food, energy and mineral resources."

Outcome 3 acknowledges the importance of distinctive regions. Our view is that there are in fact four, rather than three, distinct regions of Wales; and the NDF should be revised to reflect this. We elaborate on this point below. Otherwise the NDF risks limiting the distinct sustainable development of one or both parts of what is currently lumped together as 'South West & Mid Wales'.

There is a lack of clarity of the implications of a priority for urban densification in Policy 1 based on the larger settlements, and attempts to support rural towns in

Policy 4. The tension between an urban and a rural focus occurs in many parts of the document, and produces a less than clear picture for the future of rural Wales.

Given the forward looking nature of the documents, more could be done to imagine a positive rural future – not least based on proper digital connectivity. Rural Wales in 2040 with 4G and fast fibre could be host to a much greater variety of jobs and economic activities than the somewhat stereotypical statement that “Priority should be given to economic activities with strong links to rural areas, including food and drink processing, energy generation, tourism and leisure, the environmental economy and businesses ancillary to farming, forestry and other rural economic activities.” As the next line highlights, business diversity can and will be enabled by digital connectivity: “The improved provision of broadband in rural Wales supports an increasingly diverse business base.”

We would welcome a greater coherence in the framing of the NDF to recognise that Wales’s future is as much rural as it is urban.

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 checked="" 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 checked="" 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:

As noted above there is a risk that Policy 2 directly counters Policy 4; there is certainly a tension that could be detrimental to sustainable economic development in and across Wales.

The NDF could be more internally consistent, and better framed to properly reflect the rural / decentralised future ahead of Wales as much as a future characterised by urban densification and agglomeration.

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 checked="" 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 checked="" 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 checked="" 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?

The description of Policy 7 does not describe how the transition to ULEV will be supported through the provision of the necessary infrastructure(s). The document is inconsistent in how it refers to electric / low emission vehicles throughout, appearing to use the terms interchangeably. The infrastructure required to support completely electric vehicles is different to other types of ULEV, such as hydrogen fuel cell powered cars.

We would want to see the final NDF make a much clearer distinction between these vehicle types, with a more detailed plan to deliver infrastructure in support of each.

The NDF should note and map the 527 existing refuelling stations across Wales in order to give an indication of how they will be upgraded to give the necessary refuelling coverage for ULEVs, and address 'range anxiety'. As with mobile connectivity, it should also make clearer how this will be addressed in non-market sustained areas. For example, will there be a minimum coverage/ density?

The NDF makes no reference to the implications for grid infrastructure that could follow from a mass conversion to non-fossil fuel vehicles. Similarly the NDF should give more consideration to the planning implications for local electricity grids, such as the presence of poles, pylons and other distribution infrastructure.

The future development of the transmission and distribution grids are both under-acknowledged in the NDF, and both will have implications for this policy and those related to renewable deployment. Ofgem is currently progressing a major review and update distribution network price controls, which then set the context for network company business plans. These business plans may or may not deliver a fit for purpose grid upgrade for Wales, and the window of opportunity to shape them is between now and the end of 2020. We are concerned that Wales may be missing its opportunity to influence these reforms.

The NDF should contain a policy position on the future development of both the distribution and transmission grids, particularly for electricity.

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

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

The adoption of priority areas is a positive step in focusing development on appropriate areas while protecting others (a similar approach should play out in the Marine Plan). Planning policy should also seek to maximise the benefits to those communities hosting such technology for the benefit of others, for example using cash equivalent tariff changes, local grid infrastructure improvements, including ULEV technology and charge points.

Our *Re-energising Wales* research did not explicitly consider the deployment of district heating networks (DHNs). However, we note that whilst they do provide an energy efficiency gain over many forms of individual home heating units, they are often fuelled by fossil fuel natural gas. The transition to non-fossil fuel gas would need to be an explicit element of DHN deployment.

We are also aware of fairly serious concerns raised by consumer organisations, and the Competition and Markets Authority around poor end user experience of DHNs - including excessive costs which can impact people struggling to afford their bills. Any support for DHNs should be contingent on a clear consumer protection framework being in place.

Networks for heat of 100+ new homes, should also be homes built with high fabric efficiency, and could also be networks that are Active i.e. part of the local energy demand management system, support the future proofing and more efficient, flexible use of the electricity distribution grid.

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

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

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?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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 checked="" 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.

In *Re-energising Wales* we argued that a four region approach to growing Wales' energy potential would be more appropriate to the successful delivery of sustainable economic development across and within Wales.

We undertook a detailed study of the South West in *Re-energising Wales: 'Economic Impact of Energy Transition in Wales: A Renewable Energy System Vision for Swansea Bay City Region'*, alongside work considering the whole of Wales within the wider project.

We concluded that the future energy opportunities in different regions of Wales will be path-dependent, based on existing assets and infrastructure. For example, Mid Wales has little or no gas grid, whereas the South West has both a gas grid and significant marine and tidal potential. The opportunities for local authorities in those regions are therefore fundamentally quite different.

We believe the NDF should consider these regions separately, and explore opportunities for Mid-Wales to become the first all-electric UK region, or one that successfully pioneers the integration of electricity and hydrogen.

The full report can be found here: <https://www.iwa.wales/wp-content/uploads/2018/09/EconomicImpactofEnergyTransition-2.pdf>

We also believe that renewable deployment should be considered as the fifth foundational sector of the Welsh economy, for two reasons. Firstly recognising that energy capture, generation, management and use are all fundamental to the basic functioning of the wider economy, and secondly when considering how and to whom wealth is productively and efficiently distributed.

Applying a foundational lens to energy would underpin the Welsh Government's targets for greater local ownership of many elements of the energy system, greater attention to the efficient and productive use of energy, and a deliberate effort to change the nature of the energy system to one that better serves Wales.

11. 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.

12. 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?

13. Welsh Language

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?

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.

14. 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?

Our *Re-energising Wales* report aimed for a 100% renewable energy supply by 2035, and therefore did not consider nuclear generation as part of that mix. However, we note Policy 22 – North West Wales and Energy, and the statement that:

“In determining any applications for nuclear energy generating stations in this region, consideration should be given to the need for further non-renewable energy generation, their contribution towards Wales’ energy mix, their impacts on the natural and historic environment and the economic benefits they would bring to the region.”

Given that the previous station at Wylfa was only connected to the UK Transmission system through to the Wirral, it may not be appropriate to consider any future nuclear station connected at Transmission network level as a contributor to the Welsh energy mix.

15. **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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