

From: [Rajni Nair](#)
To: [NDE](#)
Subject: Citizens Advice response to Welsh Government's national development framework
Date: 01 November 2019 14:27:05
Attachments: [Response to the Welsh national development framework.pdf](#)

Hi,

Please find attached a copy of Citizens Advice's response to the national development framework, as set out by Welsh Government. Citizens Advice is responding in its capacity as the statutory energy watchdog, which aims to represent the interests of domestic and small business energy consumers in Great Britain, including Wales.

If you have any questions or comments, please get in touch.

Best wishes
Rajni

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Responding to Welsh Government's National Development Framework consultation

Citizens Advice provides free, independent, confidential and impartial advice to everyone on their rights and responsibilities. We are responding to this consultation in our capacity as the statutory representative for domestic and small business energy consumers across Great Britain.

We are pleased to respond to this consultation. This document is entirely non-confidential and may be published on your website.

Policy 7: Ultra Low Emission Vehicles

We agree that the charging infrastructure should be delivered by the private sector, for the most part. However, there is an inevitable role for the public sector to have visibility of chargepoints and plan appropriately, particularly where there is demand but no economic case to deliver chargepoints in rural areas.

It is also important that the public sector apply appropriate pressure to the private sector - ensuring there is a sufficient distribution of chargepoints suitable for the needs of disabled people.

In developing a charging infrastructure, Welsh Government should consider impacts on energy bill payers. The cost to connect chargepoints and, where relevant, upgrade network infrastructure can be smeared across all energy bill payers, including those living in Wales. When overseeing the infrastructure of chargepoints, it is vital that Welsh Government undertake an impact assessment to identify what the financial burden is to energy consumers, working closely with relevant stakeholders like distributed network operators (DNOs) to do so.

Policy 10 - 13: Priority areas for distributed generation

It is important to recognise the implications for energy consumers in connecting renewable generation to networks in Wales. Welsh Government should ensure it works

closely with National Grid and DNOs to ensure the impact to energy consumers is minimised where possible.

Welsh Government should keep apace with GB wide industry developments like Ofgem's charging review¹ as this may have implications for planning, too.

Policy 14 - 15 - Priority areas and Master-planning for District Heat Networks

Heat networks can help decarbonise heat faster for many residents. However, as heat networks are natural monopolies, it's crucial they are designed properly to avoid inefficient and high bills for the consumers on them. Welsh Government should consider setting and ensuring the enforcement of standards, such as the CIBSE code of practice².

The design of heat networks should be future proofed, ensuring they use renewable sources or are able to transition from carbon rich gas to a renewable energy source. Welsh Government should also work with Welsh Local Authorities to ensure any heat operators are members of consumer codes, like the Heat Trust³.

More generally, as regulation is developed and introduced for heat networks, we strongly encourage Welsh Government to follow the national conversation to ensure Welsh policy is closely aligned.

Additional points

Citizens Advice welcomes the Welsh Government's clear and comprehensive development framework. However, we note there is no reference to zero carbon homes and improving the energy efficiency of buildings, where there are large refurbishments to the property. Improving the energy efficiency of buildings in Wales will be crucial to meet climate change targets, and we recommend Welsh Government consider this more closely, and in the wider context of planning⁴.

¹ [Charging review](#)

² [CIBSE code of practice for heat networks](#)

³ [Heat trust](#)

⁴ [Welsh climate change targets](#)