

Conwy County Borough Council (CCBC) welcomes the opportunity to respond to Senedd Cymru / Welsh Parliament Priorities for the Climate Change, Environment, and Infrastructure Committee. Since the request, officers have held discussions with internal staff and Councillors to gather information on how best to respond, and the information has also been shared with the Conwy Climate Challenge Programme Board members.

Following discussions, the following responses to areas posed in the consultation documents have been agreed with CCBC Councillors, Cabinet Members and the Leader, and reflects the authority's views. We fully support the actions outlined to achieve the objectives and targets and have the following additional comments, examples and recommendations to make.

#### **(a) Climate Change, Energy and Net Zero**

We fully support WG's wide range of innovative projects designed to make progress with respect to decarbonisation and energy efficiency. We also agree that all the interventions are reliant on continued financial support from UKG / BEIS and Europe.

CCBC have approved a climate emergency for Conwy as a priority. A Climate Challenge Board has been established to progress the Net Zero 2050 Programme, which involves various priority projects across the Council as follows:

This area of work covers three key projects to support the approach to Net Zero carbon by 2050. Each piece of work has implications for jobs, skills and education:

##### **1. Pathway to Net Zero Carbon – Local Development Plan (LDP) Planning Framework**

Net Zero and collaboration between services and planning delivery is a key priority for Conwy. Work is underway and subject to stakeholder workshop in October 2021 to progress a Net Zero Planning Framework. The work will result in requirements on developers/landowners to meet certain requirements from new development (renewables, transport, green infrastructure, etc.). The Planning Framework will act as an overarching strategic strategy for the LDP and ensure that all land-use matters prioritise net zero. The framework also covers other policy/land use elements **related to active travel, public transport, biodiversity, waste, renewables, etc.**

##### **2. New Build and Net Zero Carbon – Local Development Plan New Build and Net Zero**

Housing and Employment are high energy users for Conwy alongside transport. Priorities for Conwy are to reduce these demands, improve sustainable infrastructure

and increase renewable energy supply. This work is nearing completion. The policy approach is to ensure that developers build/retrofit developments to progress towards net zero. This is on the basis of achieving higher levels than Part L Building Regulations and put in place in the mechanisms to achieve this. The mechanisms will include developer guidance and a viability assessment protocol for developers to utilise.

### **3. Local Area Energy Plan (LAEP) Pilot to Support the CCBC Climate Emergency**

The LAEP is priority for Conwy in working towards and Planning for Net Zero. The Plan will work with key stakeholders to prepare a transition plan from the current energy supply system to a net zero energy system approach. This is a significant whole energy approach and will involve key stakeholders are involved in ensuring a deliverable LAEP. Workshop 3 is planned for October 2021 before preparing the final optimisations and mapping route for Jan 2022. This plan is a priority for CCBC and will set out how Conwy will transition to Net Zero, tackle demands (housing, economic and transport), approach to infrastructure planning and increase energy supply.

#### **(b) Marine Energy Programme**

CCBC supports the work that WG have undertaken to stimulate tidal power generation in seas around Wales and we have prioritised the promotion and delivery of a tidal lagoon. Whilst this project is in the initial stages, the benefits of the project work towards a number of key priorities for the Council e.g. energy supply, net zero, delivering community needs, flood management and regeneration opportunities, creating jobs and investment in new industries in the County.

#### **(c) Tree planting**

The Local Authority is working with a number of resident groups to increase tree coverage across the county in both the rural and urban environment. We are progressing opportunities for urban planting and maturing plans to develop a tree nursery to complement our current horticultural activities.

A recovery program to develop a positive response to the Ash Dieback epidemic will form the backbone of our activities in the short to medium term though funding remains critical with a significant conflict – the desire is to increase tree coverage yet we are faced with removing substantial numbers of infected trees over the coming years. Dedicated recovery funding will be vital to meet our objectives. As set out in our response to the Agricultural White Paper Wales in August 2021 we made the following points around tree planting within the agricultural sector:

One of the main concerns we expressed in all consultation responses is that agriculture and food production may be de-valued by WG with the environment and climate protection taking precedent. As custodians of the countryside, farmers have for generations been looking after their holdings with nature and the conservation of

habitats central to their farming practices. As the number of some farmland species have declined, farmers have withstood the worst of relentless abuse by the public, who see the decline as the fault of the farmer.

Farmers take environmental and conservational issues extremely seriously, and have pledged to improve on any actions that will see an increase in environmental standards through greening. The truth is, that the agricultural industry has done nothing but follow government policy. To reinforce how serious farmers take these issues, the National Farmers Union and its members have pledged that agriculture should strive to be carbon neutral by 2040.

Farmers wishing to plant trees have faced increasing barriers over the past decade and there are concerns about whether the proposed changes would genuinely overcome such problems.

We also questioned whether there is evidence to support the need for more trees, and whether the carbon footprint should be addressed first. There is a real risk that trees are perceived as the only answer, but science has moved on.

Notwithstanding this, and whilst the farming industry is keen to plant more trees, major concerns exist regarding the effect of inappropriate and large scale planting on the long term viability of individual farms and entire communities. The target is to increase woodland from 80 hectares to 2,000 hectares a year but where does this land come from? According to the Farming Unions, a hectare of farmed land produces more Gross Value Added and employment than the equivalent of hectares of trees. Once planted, trees cannot be felled for 25-30 years so farmers will potentially lose land for decades with no economic stimulus in doing so or benefit for the economy. An increased focus on planting implies the loss of funding from agriculture during a period of incredible uncertainty and potential price volatility.

We look forward to the publication of the Woodland for Wales Action Plan later this year.

#### **(d) Nature and biodiversity**

We fully support the objectives and key actions set out in the Our Nature Recovery Action Plan (NRAP) to achieve WG ambitions for nature recovery. However, more needs to be done and WG and Local Authorities should lead by example and showcase case studies in enhancing and extending all blue, green and grey infrastructure affected across its remit. Including but not limited to:

- Nature based solutions to flood risk and water quality e.g. natural regeneration of riparian habitats, restoring dynamic natural processes naturalising floodplains, SUDs schemes.
- Enhancements to built infrastructure ,providing habitat for wildlife egg bat roosts, bird nesting opportunities, green walls/roofs, rain gardens, active travel routes as habitat connectivity opportunities.

- Strategically buying areas of unproductive agricultural land or reallocating land benefiting only single tenants to deliver net zero and NRAP actions for future generations. In regional partnerships networks could be built to protect small catchments.
- Normalising nature conservation management in the public realm e.g. wildflower meadow areas in all parks alongside recreational zones, areas of green beach/rock pools alongside recharged amenity beach, road verges left uncut in mid-Summer.
- Strategic approach to management objectives (with targets for land in good ecological condition) of the Local Authority estate for the purposes of nature conservation and climate change mitigation aligned with local NRAP and GIA objectives. To deliver for local priority habitats and species and public enjoyment e.g. incorporating woodland estate into the Wales National Forest.
- Promote ecological literacy across local authority and public service staff and public linking personal actions with cumulative impacts and guidance on recovery action.
- There is a need to streamline the planning process such that applicants are clear at point of application what supporting ecological information will be required for their type of development before it will be considered and the nature and extent of biodiversity enhancement that is appropriate for the scale of the development. This could potentially avoid a lot of wasted officer time in chasing information and getting submissions up to standard and frustration on side of applicant.
- Additional Human resources and access to expert guidance is required to effectively implement some legislation/ policy for example assistance from water quality experts on screening phosphate loading of developments on SAC and WFD waterbodies.
- A mechanism needs to be put in place for small scale developments to deliver off site biodiversity enhancement where it is not possible on site such that there is a net benefit for biodiversity and not a net loss as currently. Scope for this is currently being explored through the use of S111 agreements in NW Wales.
- An intrinsic need to include natural assets along with other capital assets in Local Authority accounts such that the economic, social value and need for maintenance is acknowledged and adequately resourced.
- Need to share work programmes delivered and successes through and between Local Authorities with regard to climate and nature emergency action – a Wales wide Community of (Best) Practice.
- Greater investment in technology to facilitate the long-term management of natural assets e.g. web linked soil moisture monitors for tree planting schemes.
- Environmentalists in post to coordinate and drive the delivery of this work.

## **(e) Circular Economy**

CCBC supports the WG strategy of 'going beyond' recycling targets to place more emphasis higher up the waste management hierarchy so that the sequence of preferences is now eliminate, reuse, repair, recycle. With the assistance of WG, CCBC is already making this transition for example with the 'Hapitat' concept, a new repair shop.

Reuse is embedded in to Conwy's Household waste recycling Centre contract too which has operated very successfully, changing the old culture where service users would just 'take rubbish to the tip' to users today who pre-sort their waste in to reusable and recyclable items before they arrive at the Household Recycling Centre, and whilst at the site they often visit the reuse shop.

To support reusing, repairing and recycling, much attention is required at the design stage for products and packaging to ensure that full life cycle is considered when developing a product. Too often products are designed with no consideration of what happens to them when they are ready to be discarded by the user (and this is even true for so called green products like compostable cutlery where there is no real reuse or recycling option available for them, they have to be disposed of).

We would welcome further opportunities to look at how we maximise interventions re the Circular Economy (Repair Café's, Library of Things etc.) in partnership with Waste and Resources Action Programme (WRAP) Cymru and WG.

## **(f) Environment and Transport**

Reducing the risk of flooding to people, properties and infrastructure in our communities in Conwy is a significant priority and we fully support the objectives your National Strategy for Flood and Coastal Erosion over the next 10 years. We welcome that it focuses not only on reducing present risk, but also preventing issues for future generations through more informed planning decisions, the better management of water and natural flood management. The storms of February 2020 left its mark in Conwy County as many other Local Authority areas across Wales and highlighted the risks we face from our industrial heritage.

We suggest the following areas be considered and prioritised going forward:

- Long term funding mechanisms – allow Local Authorities time to run through strategies and business cases rather than having to rush to a set construction deadline which may not be appropriate timing to adapt to increasing climate change.
- Ensuring all areas that use climate change estimates use the same data – i.e. flood risk management and planning have used different climate change allowances based on when guidance is released. Guidance should point to the location where the latest data can be found so that only one thing needs updating to feed into all relevant guidance.
- Consider how to prioritise necessary flood alleviation schemes that are difficult to justify under traditional cost benefit analysis – e.g. Managed Realignment

coastal schemes or inclusion of Natural Flood Management measures which don't directly or significantly protect property but may provide necessary long term adaptation benefits.

We look forward to continuing to work with you to develop permanent arrangements which will require the development of legislation.

In respect of transport and the recently published Llwybr Newydd – The Wales Transport Strategy (WTS) 2021 we fully support the vision that the strategy sets out. Conwy in collaboration with Welsh Government and Transport for Wales is committed to developing its Transport services to ensure these priorities are met.

Work is already progressing in terms of providing a more structured network both nationally and regionally and this collaborative approach we would hope would be a key component of any future plans moving forward.

We would encourage further investment in the wider infrastructure that will enable services to be provided in line with the expectations of the strategy and ensure Public and Community Transport can be delivered efficiently in the future. Recognising that the key to delivering many of the potential outcomes of the strategy rest on the accessibility and quality of the roads and facilities within the communities they serve.

We would also support any further grant funding in the way of developing future skills in the Transport Sector. The current situation with driver shortages shows there is a need to encourage more people to consider Transport a viable career option moving forward and this can be demonstrated in wider ancillary transport services such as maintenance and planning.

### **(g) Digital Infrastructure**

Ofcom reported in September 2020 that 93% (51,388) of Conwy properties have access to 30mbps minimum superfast broadband download speeds (which we would determine from our own internal surveys of staff experience with home broadband maybe a 'best case' scenario. They further reported that 3% (1,915) properties do not have access to broadband speeds of 30mbps. Whilst these numbers are broadly in line with national averages, the numbers of properties with access to fibre speeds up to 300mbps broadband of 7% falls significant below the national average where 60% of properties now have access.

For Conwy and other rural communities most impacted by poor broadband connectivity through landlines or mobile these limitations continue to impact families trying to work from home, children's education and businesses on a daily basis. To access reasonable broadband speeds therefore very often have no option but to travel to locations such as offices or hospitality premises with good broadband may still be essential. Their difficulties are further compounded by the fact that the poorest broadband speeds aren't reflected in the charges broadband suppliers levy for access to their services.

The impact on businesses has also been significant, particularly for tourism and hospitality businesses where customers have an expectation of high speed broadband to work and stream content which simply isn't available.

The North Wales Economic Ambition Board Local Full Fibre to the Network (LFFN) programme targeting installation of full fibre links across public sector properties in North Wales will help to increase access to higher speed broadband connections, sometimes for the very first time.

However we would encourage and support a greater influence or expectation on broadband providers to extend access to higher speed connectivity to communities and properties most affected by existing slow speeds as a matter of priority given the wider overall benefits both to individuals, businesses and from an environmental view point.

### **(h) Digital and Data**

In relation to Digital and Data we support the positive steps taken to further improve understanding and development of digital services across Wales. Our own draft Conwy Digital Strategy aligns well with the priorities and objectives set out in The Digital Strategy for Wales.

Cyber resilience remains a key consideration for the Council to ensure our measures in place to protect our data and systems as well as keeping infrastructure resilient and secure.

We are also keen to work with our services to test and adopted newer or emerging technologies to determine where they may offer significant benefits from an environmental, safeguarding, and financial or efficiency perspective.

Grant support from WG to develop skills and tools to strengthen cyber resilience have been of benefit and engagement with colleagues in WG around future priority areas for investment are considered to have greatest impact are also really positive. We would ask WG to further consider as part of plans to encourage and prioritise development of digital services perhaps focussed on delivering environmental benefit (e.g. digital initiatives or systems that may reduce the need to travel) as well as funding support for capital investment that such investments also consider employment of officer resource (or a contribution towards) so that the capacity for organisations who are working at limits is expanded to focus on digital data.

### **(i) Housing**

It is encouraging to hear that WG will be implementing a new housing quality standard setting quality requirements for social housing centred on flexibility, space and sustainability.

It is also a laudable ambition to see the public sector leading the way and achieving decarbonisation status with all properties having EPC A, however this would require a herculean effort for that goal to be realised, in addition to a huge investment of

grant subsidy / public finance needed to support the organisations business plans in lieu of the additional work required. Taking into account the latter we question if the target date of 2030 is realistic. Clarification is also sought around whether the housing target is to achieve full decarbonisation status or EPC A, as this will affect the type of measures and general retrofit approach.

Since the Minister for Climate Change announced the targets in 2019, social landlords have been carrying out stress testing and financial modelling of their stock based on EPC performance. One partner has advised that their stock would require an investment of over £100m to achieve EPC A on all stock over a 30 year period. This sum increases to over £140m if accelerated over a 10 year period as the organisation would also need to bring forward other capital works within business plan periods.

The other significant challenge to achieving the ambition is the supply chain and skills shortages. If all social landlords committed to zero carbon/EPC A by 2030 the demand would vastly outweigh the supply there currently is in Wales. Many of the specialist works with renewables and insulated render systems need time to establish nationally and locally.

Although there is an urgency around the climate change agenda perhaps there needs to be a sense check in terms of what can practically be achieved within the current timeframes. A longer timescale would allow social landlords time to establish the right supply chains and plan the work with their tenants. The tenant aspect should not be underestimated either as there will need to be education and support around learning to live in a decarbonised home.

The optimised Retrofit Programme funding is welcomed but is by no means the solution to the target but has the potential to demonstrate how decarbonisation retrofit could be delivered.

The new WHQS requires urgent publication so as not miss opportunities with current capital works programmes.

There is also a risk that the resourcing and focus on the decarbonisation of existing social homes will impact on the delivery of new affordable homes programmes at a time when more social / affordable homes are needed across Wales.

From a housing perspective one of the main areas that the committee should focus on would be the reality of achieving the desired decarbonisation targets within the timescales set.

## **(j) Town Centre Regeneration**

The Transforming Towns agenda which was announced in January 2020 with a package of support has been welcomed in Conwy and we have benefitted from £3,147,125 of the funding to rebuild and refurbish buildings and public spaces and tackle empty properties. The fact that the Transforming Towns programme is focussed on improving biodiversity and green infrastructure; repurposing neglected properties; increasing flexible working and living space; and providing access to



services and leisure is appreciated, and works towards many of our strategic objectives.

It is also heartening to hear that Transforming Towns and the Town Centres First principle will remain a focus in the next few years and there's a real recognition of the need for regeneration in light of the challenges facing town centres. In recent years the decline of town centres has been a growing concern within Conwy. Over the last 12 months these longer term trends have rapidly accelerated as a result of the Covid-19 pandemic leaving many town centre properties vacant. Towns have lost key anchor services such as banks and post offices as these services are now more available online. This has had a huge impact on our high streets.

We have also maximised the recent offer to go for two Town Centre loan investments opportunities. As well as this opportunity we have also recently applied for Transforming Towns revenue funding to undertake Green Infrastructure Audits for our eight main towns in the county, and some high level place planning work. This information will enable us to consider and include the findings and recommendations from the resulting GI Audits and high level place planning in our future capital applications for grant funding from the Transforming Towns programme. Enhancing existing GI assets and creating new, multi-functional green spaces provide a range of social, environmental and economic benefits for Conwy's highly populated towns. Conwy CBC have already undertaken an overarching GI Assessment for the whole county, and this proposal will enable more detailed audits to be undertaken within our eight priority towns.

Suggestions for future emphasis are as follows:

- The funding needs to be simplified and we urge for approval of five year budgets if not longer as opposed to a yearly allocation. This will enable us to better plan for future projects in town centres. The negative impact of yearly financial year ends on Town Centre regeneration is huge.
- Need interventions to incentivise private developers into town centres. They naturally want to go to places which are profitable e.g. edge of or out of town and this needs to be disincentivised. Town centres have more dwell time than out of town shopping parks and there is potential to capitalise on this.