



NDF Consultation – Response from the Future Generations Commissioner for Wales, Sophie Howe

My response to this consultation constitutes advice issued under my section 19(1)(a) power.

I would like to thank the Welsh Government's planning team for having sought the advice of my office from the start of the preparation of the first draft National Development Framework for Wales.

I am pleased that the team have, in particular, followed our advice on involvement and have engaged more widely and differently from what they would have done prior to the coming into force of the Well-being of Future Generations Act.

You will be aware that I have already advised that you need to consider future trends and scenarios in the development of this plan. As well as the issues around carbon emissions and biodiversity I have raised below, this is also clearly crucial in terms of how the NDF will support the delivery of the infrastructure required particularly in terms of connectivity and the changes in how we will live and work as a result of the fourth industrial revolution. I would like to understand how this has been considered in the framework.

Turning to the substance of the framework:

Consideration of the well-being of communities

Subject to my main concern explained in the next paragraphs, I generally welcome the contents of the document and its references to community's well-being which follows my advice and I can recognise a real intent to embed the Well-being of Future Generations Act throughout the framework. Clearly the Government will need to demonstrate how these intentions are being implemented on the ground when the NDF is finalised as I am increasingly concerned that the aspirations set by Government are not being fully realised due to a lack of focus on supporting the change in culture needed and monitoring implementation.

Climate emergency, biodiversity and carbon targets

The work on the NDF started prior to the declaration of Climate Emergency and I would like to understand precisely how the NDF contents are to be amended to reflect this very important development.

In the same line, I would also like the Government to explain how the proposed NDF and maps have been assessed in line with the delivery of the national carbon reduction targets. I would like to see a robust analysis of how the NDF can help deliver the national carbon targets and how the framework seeks to carefully avoid increasing carbon emissions. While I was pleased that, following on my advice, there are commitments to 'low emission' transportation, 'low carbon' heat and energy generation throughout the document I fear this won't compensate for the proposed increase of high carbon emission projects (ports, airport, etc.) encouraged by the framework.

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This is particularly based on the fact that while some parts of the document encourage the right behaviours (renewables, cycling path, green belts, mixed use developments, mixed tenures, low carbon energy, low emission transport etc.), these can be totally undone by other parts of the framework such as the push towards airport and port development.

The same point applies also in relation to the enhancement of biodiversity required in Wales by the Environment (Wales) Act. I would also like to see more clearly how the need for nature and biodiversity recovery has been taken into account and is delivered through the NDF, as well as how the Sustainable Management of Natural Resources principles have been applied (in addition to the sustainable development principle and ways of working in the well-being legislation) to the design of the NDF and in particular for design of the maps. I would therefore like to see another clear assessment of how the proposed NDF will help reverse the current biodiversity decline and I am not sure that the current propositions will be sufficient.

The proposed draft of the NDF does not yet reflect the Climate and Ecological Emergency Declaration which must be taken seriously and be implemented in this framework (as well as in all other government policies) and I would expect to see visible amendments to this framework following a review in the light of the declaration. Latest evidence suggests that the UK's share of the global carbon budget between 2010 and 2050 would need to be around 7,600 MtCO_{2e} in order to have an 80% change of avoiding an above 2 degrees global average temperature rise. The State of Nature Report 2019 reveals that of the 3902 species assessed in Wales 73 have been lost from Wales already with a further 666 species being threatened with extinction. The NDF must demonstrate clearly how it will support the reverse of this decline.

Disconnect between the ambitions and objectives of the framework and the priority area maps

I would like to understand how the current maps would enable the delivery of the objectives of the NDF. For example, it is not clear that renewable onshore wind development of the size and scale consistent with the stated ambitions of Ministers will be possible because it is suggested that a significant part of the priority areas might not practically be suitable for sustainable wind farms. It has been brought to my attention, as another example, that the area around Newport has restrictions such as infrastructure and flooding zones which would render impossible the delivery of the development suggested in the proposed NDF.

It is clearly crucial that the NDF supports the shift to a low carbon society in terms of the 'words' of the document but critically in terms of what flows in terms of 'action'. We must see a clear and detailed assessment of whether this framework will deliver decarbonisation targets in terms of the shift to renewable energy.

What assessment has been made as to how the framework will support practically both the long term environmental and economic benefits of off shore wind and solar energy required to meet decarbonisation targets in the Environment Act and beyond given more recent Ministerial commitments?

I would therefore like to see further and detailed analysis of the practical and more granular potential for each of the areas highlighted in the NDF to ensure that the overall ambitions of the Government as well as the proposed

NDF objectives can be delivered by this NDF (integration) and to identify the areas which might need adjusting to ensure implementation in the short and longer term.

Updating of the TANs and Investment plan

The setting out of the first NDF is part of the general recast of the land use planning in Wales and I would like to know what the government's plan is for updating the Technical Advice Notes and the Investment Plan referred to at the beginning of the document in light of the new planning and climate change policies. These will also impact the good implementation of the NDF.

Transitional Period and Reliance on SDPs

A final point concerns the references in the proposed NDF to the Strategic Development Plans which will provide a lot of the details of the implementation of the NDF objectives and policies. I understand that only one SDP is currently in preparation and it might only be ready in 2025. This is of significant concern given the timescales for decarbonisation. This development framework is just the initial phase of the policy change process that would be required to meet targets and without comprehensive adoption and implementation at speed. I would therefore like to know what the transitional arrangements are for the 5 to 10 years ahead until we have SDPs in place but also what would be the provisions if no such plans were adopted in some places.

Conclusion

I am grateful for the opportunity the Welsh Government has given to my office to work with this them on this draft. They have taken in account most of my advice to date, but having seen the full proposed document, I am concerned that the proposed NDF won't sufficiently moving us towards a resilient and low carbon society at the pace and scale required to meet our duties around decarbonisation and the enhancement of our ecosystems which are needed to fight climate change and to meet the needs of future generations. I would like to see, to reassure me and to improve the framework, detailed analysis demonstrating that the NDF and in particular the design of the different areas will enable Wales to meet practically its sustainability ambitions and well-being goals.