

Draft National Development Framework

1. NDF Outcomes (chapter 3)

Q1. 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?

Agree

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them

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

Kingspan agrees with the 11 outcomes, particularly for living and working in healthy places. 'High-quality homes meeting the needs of society', as set out by the consultation document, can be achieved through improving the energy efficiency of homes whilst ensuring there is appropriate ventilation. This will ensure that people, particularly those vulnerable to the cold and living in fuel poverty, are able to be warm and comfortable whilst protecting their health. It may also help to improve the indoor air quality of the home which can help support those suffering from respiratory conditions such as asthma. Kingspan believes that climate change is the most important challenge facing the world today, and it is important to ensure that in line with outcome 11, the housing stock is decarbonised. Buildings account for 39% of all global CO2 emissions when upstream power generation is included. 28% of this comes from operational use, 11% is embodied in building materials and construction. For this reason, the built environment has the potential to play a vital role in a Net Zero carbon emissions future. To achieve decarbonisation of the housing stock, energy efficiency upgrades will be needed, as well as heating switched to low-carbon sources. Treating the fabric of a property first to minimise its energy demand will be crucial for installing an appropriately sized heating system which will help to achieve a decarbonised future for Wales.

2. Spatial Strategy (policies 1 - 4)

Q3. 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	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)		X					
Rural areas (Policy 4)		X					

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

The spatial strategy indicates good ambitions for both the urban and rural areas and within this, the relative housing stock. As suggested in the consultation document, public buildings should play a role in leading the way in terms of having a good energy performance and there is a need to address the quality of energy efficiency in both rural and urban properties.

3. Affordable Housing (policy 5)

<p>Q5. 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?</p>
<p>Agree</p>

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

As previously mentioned, the decarbonisation of housing is a key step in achieving Outcome 11 of the National Development Framework and wider Welsh Government decarbonisation targets.

According to the 2017 IEA report Energy Technology Perspectives, "high-performance buildings construction and deep energy renovations of existing building envelopes globally represent a savings potential more than all the final energy consumed by the G20 countries in 2015, or around 330 EJ in cumulative energy savings to 2060." However, according to the 2017 GABC report Towards a zero-emission, efficient and resilient buildings and construction sector, under the current trajectory "final energy demand in the global buildings sector is predicted to increase by 30% by 2060. As a result, buildings-related CO₂ emissions would increase by another 10% by 2060, adding as much as 415 Gt CO₂ to the atmosphere over the next 40 years – half of the remaining 2°C carbon budget and twice what buildings emitted between 1990 and 2016." Furthermore, the 2018 edition of this report stated that "... over the next 20 years, more than half of all new buildings expected to exist in 2060 will be constructed. More alarmingly, two-thirds of those additions are expected to occur in countries that do not currently have mandatory building energy codes in place."

This is all within the context that reducing energy demand is viewed by the IPCC as a low-risk pathway to a 1.5°C scenario. Their 2018 report stated: "in energy systems, modelled global pathways limiting global warming to 1.5°C with no or limited overshoot generally meet energy service demand with lower energy use, including through enhanced energy efficiency, and show faster electrification of energy end use compared to 2°C".

At Kingspan, we believe urgent action is needed to legislate to reduce energy demand in the buildings sector, in order to achieve Net Zero carbon emissions globally by 2050. This is particularly urgent for new construction, including the construction of new affordable housing. Getting the energy efficiency of new builds right avoids the need for retrofit later, ensuring that the future housing stock is consistent with the Welsh Government's decarbonisation targets and avoids subsequent costs and inconveniences for consumers.

Furthermore, affordable housing means homes that are not only affordable to buy or rent but also those that are affordable to run. This includes minimising energy bills through measures to improve the energy efficiency of all homes to a high standard, helping to protect those who struggle to afford the cost of heating their home.

Given the dual aims to decarbonise housing and solve the affordable housing crisis, it therefore makes sense to ensure that new builds are constructed to the highest possible energy efficiency standards at the time of building. This should be strongly encouraged by the planning frameworks, including the National Development Framework. It would also be helpful to put in place stringent post-construction checks on buildings to ensure that they are performing to the level that was specified in the design stage, and that materials and methods of construction are in-keeping with those in the initial plans. While Kingspan welcomes Outcome 11 of the National Development Framework, Kingspan would encourage the incorporation of the outcome throughout other policies, including the decarbonisation of affordable housing.

At Kingspan we believe that the challenges we are facing to transform our industry can only be achieved through collaboration, supported by wider change across a range of areas to drive new and better solutions to address the issue of climate change and solve the affordable housing crisis. With the Welsh Government central estimate suggesting a need for an additional 114,000 homes across Wales up to 2038, the development of 'Modern Methods of Construction' (MMC) is vital to improving the pace and quality of affordable housing built in Wales. At Kingspan we have invested in IKON, our new global innovation centre and centre of excellence for Research and Development. Focused on advanced material science and the digitalisation of construction, it will seek solutions for a sustainable future while delivering enhanced value, convenience and efficiencies to our customers. Kingspan supports the Welsh Government's Innovative Housing Programme and suggests that the National Development Framework's approach to affordable housing include consideration and encouragement of the use of MMC to support the delivery of houses which are affordable to buy and run.

4. Mobile Action Zones (policy 6)

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

No opinion

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

No Response

5. Low Emission Vehicles (policy 7)

Q9. 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?

No opinion

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

No Response

6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

No opinion

7. Renewable Energy and District Heat Networks (policies 10-15)

Q12. 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	Don't know	No opinion
Large scale wind and solar developments		X					
District heat networks		X					

Q13. 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 transition to a low carbon economy will require reductions in energy demand, prior to the development of large-scale wind and solar or district heat networks, to ensure that the need for energy generation is minimised.

Following energy efficiency improvements to the built environment, in order to minimise energy demand, the NDF's approach to lowering carbon emissions is sensible and will help to achieve ambitions in the low carbon sector. It is important that long-term and stable energy policy is put in place and industry can prepare for the transition to a low carbon economy, as such the National Development Framework should reflect this in the energy generation and efficiency plans it puts into place.

8. The Regions (policy 16)

Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?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.

No opinion

9. North Wales (policies 17-22)

Q15. 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?

No opinion

10. Mid and South West Wales (policies 23-26)

Q16. 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?

No opinion

11. South East Wales (policies 27-33)

Q17. 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?

No opinion

Q18. 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.

It is important that all the regions undergo a scale-up in both the quality and volume of housing. For this, the need to ensure that Building Regulations are met and exceeded will be essential in determining the quality of any new development. There is an opportunity for the regions in Wales to lead on higher devolved standards in housing, which could put them at the forefront of the UK's housing sector and set an example for the rest of the UK.

Fully funded policies to support the improvement of home energy efficiency should be a priority for the Welsh and UK Government alike. Improving energy efficiency can drastically help to reduce the incidence of fuel poverty, limit carbon emissions from homes, and create warmer and more comfortable places for people to live and work in.

Ensuring that the energy efficiency of the home is optimised before installing low-carbon heating means that systems with a smaller capacity can be implemented, which saves the consumer upfront expenditure as well as generating regular savings through reduced energy bills. Policies such as these generate more disposable income for households and support clean growth in the Welsh economy.

12. Integrated Sustainability Appraisal

Q19. 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.

No comment

13. Habitats Regulations Assessment

Q20. 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?

No comment

14. Welsh Language

Q21. 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?

No view

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: 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 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.

No view

15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

No further comments

16. Are you...?

Q24. Are you:

Submitting a response on behalf of an organisation

Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Rita Singh

Organisation (if applicable) Kingspan Insulation

Preferred contact details (email/phone/post) [REDACTED]

Q26. If you want to receive a receipt of your response, please provide an email address.
Email address

[REDACTED]

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response