

Consultation Response Form

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<u>Organisation (if applicable)</u>	<u>Port of Milford Haven</u>

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

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

The NDF outcomes can only be achieved by a process of collaboration across the public and private sector. The key to success will be the establishment of a framework which promotes this.

Outcome 1: the quality of digital connectivity is equally important for non-residential premises. This will ensure productivity gains and ensure Wales can give its people the work-life balance that is more in keeping with the 7 wellbeing goals and desirable in modern society.

Outcome 5: Maritime ports are of strategic importance for achieving the smooth functioning of the internal market and the strengthening of economic, social and territorial cohesion¹. Ports and areas around ports are also magnets for job creating investment and should be added to the list.

Outcome 7: We believe hydrogen fuel cells are likely to play a big part in future transport technology. Evolved from Welsh Governments Smart Living program, our proposed Milford Haven: Energy Kingdom project will support the commercialisation of this technology through the identification of market mechanisms. Smart Living's West Wales and the Valley's Catalyst Zero Carbon Zone², Milford Waterfront will promote this project, associated technology and other decarbonisation linked innovations, showcasing for public awareness.

¹ COMMISSION REGULATION (EU) 2017/1084, June 2017

² Welsh Government Smart Living Initiative, CSE, July 2018: Available [Here](#).

Pembroke Dock Marine offers a significant opportunity to support the commercial production of renewable energy and potentially hydrogen as an energy vector and both should be identified as key projects

Outcome 11: Milford Waterfront and Pembroke Dock Marine has decarbonisation as a fundamental principal and with support, has the potential to deliver energy systems innovation and marine renewable energy for Wales. We fully expect these to underpin the low carbon transition of the Milford Haven Waterway, promoting Wales as a world leading centre for decarbonisation and marine renewable technology but it will require the consistent support of WG to achieve this. It would be helpful to see this spelled out within the final document.

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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:

Spatial Strategy:

We believe the Milford Haven Waterway should be identified as a national growth area with Pembroke Dock as a Centre for National Growth.

The economic activity dependent on the Milford Haven Waterway contributes £323.7m of GVA to Wales and the UK³.

Welsh Government are supporting the aspiration to maintain and enhance this level of activity as we transition to a low carbon society. Given the policy alignment, support to date in driving projects like Milford Waterfront and Pembroke Dock Marine, designation as a National Growth Area and Centre for National Growth will ensure this activity is given the national significance it requires to promote Wales to the global economy.

Policy 1:

³ An Analysis of Economic Activity Dependent on the Milford Haven Waterway, Cardiff Business School, 2012. Available [here](#)

Urban growth should not only support towns and cities but the areas of economic productivity, like the Milford Haven Waterway.

Policy 2: Supporting our Urban Areas

This policy could be interpreted as contradictory to the closure and relocation of three town-based hospitals into a new central rural based facility, but we empathise with the challenges facing the health service and that it may warrant an exceptional circumstance.

Policy 3: Public Investment in Land

A closer collaboration with key stakeholders, whether individually or collectively with the private sector and statutory undertakers like the Port of Milford Haven, will de-risk public investments and increase the potential for major positive change.

As a Trust Port, the Port of Milford Haven want to encourage sustainable and productive use of waterway-linked assets that are in public ownership for national benefit.

Policy 4: Supporting Rural Communities

The Milford Haven Waterway and surrounding rural area is a key driver of economic activity in Wales. Princes Gate, Puffin Produce and Capestone Organic are strong national brands linked with food and drink processing.

The incumbent energy generation sector and developing marine renewables sector provide a significant contribution to Wales' current and future energy generation requirements.

Pembrokeshire is visited by 4m+ tourists a year and the Port of Milford Haven want to see these levels increased. Our Milford Waterfront development is focused on promoting Milford Haven as a low carbon tourism and leisure-based destination within the Pembrokeshire Portfolio.

Pembroke Dock Marine and its support from Welsh Government has opened up new and exciting opportunities to promote Pembroke Dock in the tourism and leisure space, telling the significant Welsh contribution to British sea power, currently untold in any breadth in Wales.

300,000 tourists transit through Pembroke Dock as an international gateway each year and this is a figure that the Port of Milford Haven want to increase. This desire is shared and supported by the Haven Waterway Enterprise Zone.

Enabling infrastructure is key to facilitating this increase. Part funded from Welsh Government through the Port Development Fund, re-purposing of the disused offshore jetty at Hobbs Point in Pembroke Dock provides the most cost-effective means to providing a multi-use berth within the Waterway, which cruise would be an important component of. In collaboration with the Haven Waterway Enterprise

Zone Board, we are working through the next layer of feasibility and having a National Growth Area / Centre of National Growth designation around the industrial / rural area of the Milford Haven Waterway will not only support the progression of this opportunity but also underpin this policy.

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

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

There is a strong case for collaborative working to achieve this objective. It will not succeed in every case, but appropriate developments would thrive from such an approach.

In addition to affordable, emphasis on the sustainability of homes should be given equal weight in this policy.

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

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

It is not clear how the Mobile Action Zones will be identified and/or prioritised. There needs to be a presumption this will not automatically result in larger cities being dealt with first.

There is also an opportunity to work with building owners and developers to ensure that the relevant infrastructure can be incorporated during the design

and/or refurbishment of any building. This will obviously require additional planning well in advance of the physical works taking place.

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 fundamental issue will be the capacity of the electricity network to supply the rapid increase in the number of chargers and their unpredictable daily and seasonal use. The policy presupposes that 'rapid charging' can be achieved in a time acceptable to drivers and their passengers. As previously stated, we wonder whether battery technology might not be a long-term fix as other technologies come to the fore.

Shipping is responsible for substantial emissions of greenhouse gases and air pollutants. Current regulations and incentives mean that without further intervention shipping emissions are expected to increase in an unsustainable way, with associated climate change impacts and damage to human health.

Maritime 2050⁴ includes a commitment to actively drive the transition to net zero emission shipping by 2050 and the implied UK market potential by the middle of the century is estimated to be worth \$460-690m (reference 5).

Abatement options include the use of Hydrogen, Methanol, Ammonia and Bio-LNG⁵ to achieve these aims and given the limitations of battery technology for transport, we feel the policy should have a wider scope to look at all energy vectors relating to transport and the associated infrastructure.

With Wales and the UK's borders largely reliant on shipping to achieve smooth market function, shipping and associated infrastructure should have specific reference in this NDF policy. Secured, this increases the potential for Wales to benefit from the associated economic benefits.

⁴ Maritime 2050: Navigating the Future, Dept. for Transport January 2019. Available [here](#)

⁵ Reducing the Maritime Sector's Contribution to Climate Change and Air Pollution, Frontier Economics for Dept. for Transport. July 2019, Available [here](#).

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

The biggest threat to biodiversity is climate change and whilst development should be mindful and seek to reduce adverse ecological impact, a balance needs to be made against this and the wider threat.

Mindful development can support biodiversity – for example, the Port of Milford Haven is working on an ecostructures project which seeks to incorporate features into maritime structures which encourage biodiversity.

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 policies on renewable energy should also refer to offshore renewable energy (wave, tidal stream, tidal range and fixed / floating offshore wind) particularly as plentiful and well defined⁶ resources are on our territorial waters and the potential economic benefits well published.⁷

The Pembroke Dock Marine project is aiming to be the World leader in the associated technologies. It is a strategic offering to the global market and has been featured in a number of national and international documents focused on awareness raising targeting policy support. These (linked below) give weight to the Milford Haven Waterway's suggested status as a National Growth Area and Pembroke Dock as a Centre for National Growth.

⁶ Marine Renewable Energy Strategic Framework (MRESF) RPS For Welsh Government Available [Here](#)

⁷ Marine Energy, A New UK industry, Marine Energy Council 2019;

Tidal Stream and Wave Energy Cost Reduction and Industrial Benefit, ORE Catapult, April 2018 ;

Macro Economic Benefits of Floating Wind, Crown Estate Scotland

<https://www.crownestatescotland.com/maps-and-publications/download/219> link last accessed 26.09.2019

Floating Wind: The UK industry Ambition – Renewable UK October 2019.

To support the commercialisation of marine renewables and floating offshore wind the thresholds should be expanded both on the minima and maxima presented in the draft NDF.

Fixed Wave and Tidal Stream are unlikely to exceed 10MW by the mid-2020s
Fixed offshore wind is already well in excess of 350MW with Floating Wind likely to be seeking consents well in excess of 350MW by the late 2020s.

We support the development of district heat networks, initially as demonstration projects and subsequently on a commercial scale. Supported by Welsh Government's Smart Living Initiative, we are examining the use of such networks as well as smart electricity networks in our development at Milford Waterfront.

The challenges these developments typically face is the commercial viability of these projects for the investor. Upfront capital costs are high and commercial viability is predicated on end users actively connected to the network. That combined with the loss of the Renewable Heat Incentive in March 2021 without a currently identified successor does leave the potential for district heating to play a major role in decarbonising Wales' heat demand in question.

It will be important to learn lessons from developments in other countries in terms of the commercial and environmental impact of such systems, particularly during the 'ramp up' phase where demand could be extremely low.

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

Policy 25

We welcome the specific policy in relation to the Haven Waterway and are encouraged that Welsh Government will commit to work with operators to support and facilitate appropriate new development.

With its purpose to 'Build the Haven's Prosperity', we would welcome specific reference to the Port of Milford Haven in this policy.

This policy supports the case for making the Milford Haven Waterway a National Growth Area and Pembroke Dock as a National Growth Centre. Its inclusion as such will support the work done to date to promote Wales internationally as a centre of excellence for marine renewables and stimulate the development of a port special economic zone where development controls are eased and accelerated in order to encourage responsible energy and tourism related developments, bringing with it economic growth, creation of jobs and the flourishing of industries appropriate to the development of marine renewable energy.

Our view is that land-based transport links are poor and require improvement; a rail journey from Pembroke Dock and Milford Haven to Cardiff can take over three hours; to London over five hours. Similarly, we consider that road links are poor, particularly with respect to reliable journey times. Modest further improvements to the A477 west of St Clears are essential but so are improvements on the M4 around Port Talbot and the Brynglas Tunnels. These are factors which will constrain investment in West Wales if not addressed.

Policies in general should allow regulators to work in partnership with responsible developers in agreeing to developments which will create jobs and prosperity, and at the same time encouraging appropriate biodiversity via responsible development. As an example, the Port of Milford Haven is working on an ecostructures project which seeks to incorporate features into maritime structures which encourage biodiversity.

We are not convinced the separation of the regions is the best which could be achieved. We see the South Wales corridor (Newport and Cardiff through to Swansea and the industrial cluster along the Milford Haven Waterway as a coastal 'thread' with its roots in commerce and industry, with a number of significant ports, the largest of which by a wide margin is Milford Haven. The rural heart of Wales has specific challenges and opportunities and should be considered as a separate region, with North Pembrokeshire included in this area.

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

13. 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.

A key omission is any reference to nitrate vulnerable zones (NVZ). The effects of nitrates in waterways are readily observable and projects such as SWEPT in the Cleddau, together with monitoring undertaken by NRW make this a readily measurable indicator. This is particularly relevant to ISA objective 9 and 13 (page 44 and 46)

We note that 'Brexit' is identified as an opportunity to take a different approach. We would advocate that approach should be collaborative to ensure maximum opportunity to achieve prosperity goals.

Wales' marine border is vast. It is pleasing to see reference to the National Marine Plan; we would argue that the significance and extent of the sea facing border deserves greater significance in terms of its ability to achieve the ISA objectives and in particular Nos. 3, 4 and 6 (page 42 and 43)

14. 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?

We welcome the HRA; those of us who work in the Port also live in Pembrokeshire and increasingly our diversification policies rely on the presence of the SAC and other protected sites.

However, we do believe that a developing port can also mean an improving environment; for too long there has been an automatic assumption that development within (say) a SAC will result in a detrimental impact.

We believe there is a case for Wales taking a different approach which is based on a combination of pragmatism and science. This would see regulators and responsible developers working together to improve appropriate biodiversity whilst at the same time promoting development.

Pressure on marine based SACs tends to be the result of ongoing farming practices increasing nitrate levels, an ongoing and visible impact; these must be addressed and kept in balance with marine based projects which we suspect will have minimal impact when compared to nitrate pollution.

15. 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 favorably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The Welsh Language is an important part of our national identity and something unique that is attractive both within Wales and looking into Wales from outside. The Milford Haven Waterway and South Pembrokeshire is predominantly an English-speaking area. Current investments in Welsh medium education will support mainstreaming of the Welsh Language in future generation's but there will be challenges in providing opportunities for Welsh language being treated no less favourably than English in business. We support the growing use of the Welsh language in our business, but intervention is needed to ensure business productivity is not detrimentally impacted.

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.

Having international connections, the MH waterway is predominantly an English-speaking area. That will need to continue as we seek to promote Wales as an international place to do business. However, there is an opportunity to promote and mainstream the Welsh Language. As a National Growth Area, the ability for the Milford Haven Waterway to increase the use of Welsh Language and support the use of Welsh Language no less favourably than English would be enhanced.

16. 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?

We welcome the opportunity to comment on these proposals. As a Trust Port we believe we have a unique opportunity to work with Government and regulators to ensure development takes place in a responsible way. We also believe we are able to make a positive contribution to consultations such as this to achieve a balance between the needs of those who seek to improve the prosperity of Wales and those who are tasked with ensuring the environment is protected and enhanced. This can best be achieved within Wales by taking a pragmatic and collaborative approach.

We look forward to further discussions on these matters.

17. 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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