



By email

6 February 2026

Dear Rebecca,

I am writing to provide you with advice regarding the Renewable Energy Sector Deal. Whilst I have not seen many of the details, my understanding is that it is intended as a partnership between Welsh government and the energy sector, which will agree commitments to the necessary actions and timescales to maximise the opportunities for Wales from renewable energy. The Deal will aim to deliver the 17.9 GW of identified renewable energy capacity in Wales, along with the £46.9 billion in private investment, saving 13 million tonnes of CO2.

I welcome the work that the Welsh Government is doing to develop a suite of actions that will help sustain the positive environment for renewable energy in Wales **while protecting and promoting the environment and the interests of communities.**

In my seven-year strategy [Cymru Can](#) (2023), I made it my mission to help Wales achieve our net zero and nature positive goals by 2030, and to help public bodies lead action on climate mitigation and adaptation, in a way that reduces inequalities and maximises the benefits to people and communities across Wales.

Despite a government target of 100% of electricity consumption from renewables by 2035, renewable energy deployment in Wales has not kept pace with this ambition. A quadrupling of capacity is required by 2035 to meet existing targets according to the [National Infrastructure Commission for Wales](#).

In my role as Future Generations Commissioner, I have spoken to many stakeholders on these issues, including public bodies, business interests, and the third sector. To follow-up recommendations in my [Future Generations Report](#) for stronger community connections on energy¹, I convened a stakeholder roundtable on 4 December 2025.

In preparing this written advice, I employed the services of the Institute of Welsh Affairs (IWA) to benefit from their expertise and objectivity. The IWA have been at the forefront of policy development on Wales' renewable energy transition. Their [Re-energising Wales](#) series set the terms for what ambitious policy at the devolved level could look like, and in [Sharing Power, Spreading](#)

¹ Recommendation 13: "Local renewable energy, including community and publicly owned energy has a pivotal role to play in achieving net zero. There is a need for more resourcing and support nationally. Public sector organisations should increase their collaboration with local energy projects by releasing land for joint ventures and committing to purchasing the electricity".



[Wealth](#), they put forward practical policies for devolved government to place communities at the heart of the net zero energy transition. My advice is independent of political parties and any particular sector or trade, and I am therefore able to provide a balanced perspective to a set of issues where there are significant competing interests for limited resources and opportunities.

The key points of my advice on the Renewable Energy Sector Deal are summarised as follows:

1. The principles of the WFG Act should run through and shape the entire Deal
2. The accelerated timescales for delivery of the Deal are imperfect
3. Implementation of the involvement way of working
4. Define, monitor and support for community benefit funding
5. Local and community ownership terms
6. Energy communities, local energy markets, micro grids and bills
7. Public bodies' role: planning, natural assets, the estate, and partnership.

(1) Purpose and framing. The principles of the WFG Act should run through and shape the entire Deal

As you will be aware, my team contributed to the [Independent Advisory Group on Future Electricity Grid for Wales](#), and played a constructive role in the development of its [recommendations](#) which were published on 21 January 2026. We regard as good practice the way that the Well-being of Future Generations (WFG) Act was purposefully and consciously put at the heart of this process by the independent Chair, to recognise that grid infrastructure must be delivered to reflect social, cultural, economic and environmental goals.

I would expect the WFG Act to be similarly positioned up front in the Renewable Energy Sector Deal, with a clear sense of how the commitments by Government and industry maximise their contribution to [all seven well-being goals](#). The Deal has an opportunity to be transformative across these goals; however, there is scope to be more ambitious. Some of the Deal documents presented, appear to pigeonhole my role and the WFG Act as only being able to support 'social value' elements of the renewable energy transition. Whilst delivering social value will need to be an outcome of the Deal, this is a concern because it doesn't recognise the need for the Deal to deliver against all of the well-being goals and five ways of working. Given the potential to realise the socio-economic and environmental opportunities renewable energy deployment offers, the principles of the Act should run through and shape the entire Deal.



The Deal is an opportunity to articulate our priorities: pace, ownership, long-term wealth building (and ownership of the benefits of our natural resources), protections for natural and cultural assets, place-based renewal, growing domestic skills base, and tackling economic inequalities.

Ideally, the Deal should be underpinned by a long-term vision for renewable energy in Wales, which must be a priority for the next Welsh Government. This is needed to be clear about how much energy is needed and where that would come from, to ensure Welsh Government and local authority actions were proactive and not reactive when it comes to *how* Wales wants the 2035 goal to be achieved. On green skills, I welcome the intent to develop a 10–15-year workforce plan linked to technology deployment targets; improve coordination between Regional Skills Partnerships and Careers Wales for early STEM engagement; and create a national tutor pipeline strategy, apprenticeship roadmap, and bilingual training resources to inspire future generations. And the commitment to champion circular economy and recycling initiatives, by developing a Welsh innovation roadmap and sharing best practice on recyclable components, decommissioning strategies and sustainable sourcing.

However, the impacts of net zero infrastructure on communities, rural tourism, visual amenity, natural and cultural assets should be mitigated against. There is no point solving one problem whilst making other problems worse. This is the integrated approach that the WFG Act sets out.

(2) Timescales

From stakeholders we've spoken to, there's a concern regarding the accelerated pace at which the Deal is being developed, which I understand is expected to be published within the next few weeks, and before the Senedd elections in May. It is understandable that industry wants to have in place a Deal swiftly to ensure the development of large-scale projects; this is also in line with Welsh Government's need to accelerate the rollout of renewables (an ambition which is echoed at UK Government level).

However, it is crucial to ensure transparency around the development of the Deal and to engage with key actors beyond the renewable energy industry, such as local government, consenting bodies, and those that focus on maximising social value principles. The accelerated timeline risks missing opportunities and input from elected representatives, planning authorities, and smaller, local and community owned projects (potentially minimising their role in the overall future energy mix). Whilst large scale projects are much needed, smaller community or public body-led schemes can deliver larger socio-economic benefits to communities and reduce impacts on the natural environment. Ideally the Deal should be underpinned by a long-term vision for renewable energy in Wales (see above).



(3) Implementation of the *involvement* way of working

Renewable energy is critical to combatting climate change and build energy resilience for long-term sustainability. Yet many large energy schemes and their associated infrastructure are a matter of concern to the public and elected representatives and are an issue on which I receive frequent correspondence.

Involvement is one of the ways of working on the WFG Act. Whilst we need to decarbonise and realise green jobs and investment, we must do this in a way that meaningfully involves Welsh communities in Wales' energy future **through participative approaches and place-based governance**. Many of the current consultation mechanisms on energy schemes are not user-friendly, for example the online Developments of National Significance (DNS) portal, used to view, track, and comment on planning applications for major infrastructure projects, such as large wind farms or power stations and managed by Planning and Environment Decisions Wales (PEDW) on behalf of the Welsh Government. We urgently need to improve how we involve people, communities, business and public bodies in decisions around energy and climate change. If communities do not feel involved in the development of energy projects in their area, and similarly, if they do not feel tangible benefits from these projects, then this fuels scepticism against the net zero agenda.

I welcome that the role of people in shaping and delivering change was recognised in Welsh Government's recent publication '[Enabling the People of Wales to Deliver and Benefit from the Net Zero Transition in 2026-2030 and beyond](#)'. This stated that "*advice in all sectors recognises that technical solutions alone are insufficient...*" and "*Across the evidence landscape, there is consistent advocacy for participatory approaches*". The [Climate Action Wales Public Engagement Strategy](#) also commits the Welsh Government to involving people and communities in climate decision-making, and recommendations 1,2 and 3 of the [IAG on Future Electricity Grid](#) also called for better communication and engagement. In my Future Generations Report, I spotlighted the work of [Gwyrdd Ni](#) who have led community assemblies to co-produce local action plans.

I have advised the climate change team in Welsh Government that the engagement work being planned as part of the Carbon Budget 3 must connect more purposefully to renewable energy policy and delivery, and the large schemes that are being put forward for planning permission.

I advise that as part of the Renewable Energy Sector Deal:

- Welsh Government publicly commit to a Wales-wide programme of place-based, participative approaches, at scale, to inform future energy planning including schemes of all sizes and scales.



- Early engagement must explicitly include and respond to local communities' views, not solely consenting bodies and developers.
- Welsh Government should itself model best practice in policy, planning and implementation, and should develop/signpost to case studies for involvement approaches or projects which have been well managed and where these can be replicated.

(4) Mandate community benefit funding

Communities in Wales are missing out on millions of pounds of potential community benefit funding (CBF) from renewable projects. Evidence shared with me by the [Coalfields Regeneration Trust](#) (in addition to FOIs undertaken as part of IWA's previous research) highlights the significant scale of benefit funding being missed out on. Through the Deal, Welsh Government must set clear expectations and requirements for developers who seek to deliver projects in Wales.

The Coalfields Regeneration Trust identifies poor rates of funding (or none at all) paid to communities which feature in the [Welsh Index of Multiple Deprivation](#). That these communities are missing out on investment is particularly concerning and highlights a missed opportunity to contribute to raising well-being whilst tackling economic inequality. There are currently no mechanisms to capture the level or scale of CBFs offered in Wales, and the evidence that is available displays that the commitment and quality of CBF schemes delivered thus far, varies considerably. There is no standardisation of rates per MW paid, governance structures for payments, the level and scale of community involvement, where funding ends up, and the impact of funding to communities.

The widely recognised industry standard for onshore wind CBF is £5,000 per MW. However, research by the Coalfields Regeneration Trust has identified that 59% of installed, or proposed projects in the South Wales Coalfields - one of the most deprived communities in the UK - receive less than this recommended level, and in some cases no community benefit funding at all. This is scandalous. CBF contributions should be mandated by Welsh Government bringing benefits to the communities hosting the infrastructure.

There are successful examples of this model operating. For instance, [Graig Fatha Wind Farm](#) (RCT) - a relatively small, 2.5 MW consumer-owned cooperative—delivers approximately an average of £124,629 into a community benefit fund, alongside direct savings for consumers. [Pen y Cymoedd](#) and [RWE's Brechfa Forest West Wind Farm](#) are also positive examples. But these are just that - examples that prove what could be done, exceptions rather than the rule.

The way that CBFs are managed and governed also varies greatly. It is unclear, at a strategic level, what government (and communities) collectively want or expect CBFs to do, what problems we



think they should help solve, how they should be established, what we want them to achieve and how they fit into our long-term economic ambitions. If these are to be a major part of how we ensure long-term local benefit from renewable energy, then more research needs to be done on the impact of funds on their local economies. Who shapes their remits, who governs where money is spent, is this the most effective way of arranging it? There is also an argument for top-slicing funding to enable the devolved state to invest in renewable energy projects at the scale and pace required. Either way, what we expect of CBFs is central to the question of how we expect projects to deliver long-term sustained value. Welsh Government are in a good position to and *should be* more explicit about what they expect CBFs to do.

I advise that the Renewable Energy Sector Deal:

- Includes a mandatory minimum contribution for onshore wind and solar. The University of Strathclyde² references a figure of £6,695 per MW, for example. An alternative approach could be based on a percentage contribution linked to project yield.
- Welsh Government should establish a public register of Community Benefit Funding and map where they are.
- Welsh Government should develop a strategy that addresses fundamental questions such as what CBFs are, what level they should be paid at, how they should be governed, how communities can ensure they get what they deserve or what broad role CBFs should play in redistributing the returns from extraction of our shared natural resources.
- A CBF toolkit and fund a support scheme for CBFs would also be useful, taking learning from [Scottish Government's CARES scheme](#). This would be intended to help communities to get involved, engage with and participate in the renewable transition in their area. Guidance for communities and developers alike would enable the delivery of CBFs which better meet local needs, with greater accountability, capacity building and trust while achieving greater impact. Such an approach could help ensure that communities don't miss out on CBF for projects happening on their doorstep, giving them the tools to access funding.
- Community benefit funding should examine all well-being goals and not become siloed spending, and consideration should be made to collate funds to increase impacts.

² Hannon, M., Gowens, R., Searle, R., Roberts, J. J., Cairns, I., Major, L. (2025) *Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds*, Strathclyde Institute for Sustainable Communities, University of Strathclyde: <https://doi.org/10.17868/strath.00092494>



(5) The role of community, local and shared ownership

Local vs community ownership

Welsh Government has a target of at least 1.5GW of renewable energy capacity to be locally owned³ by 2035, and [I've called for this ambition to be doubled](#).

The inclusion in the definition of organisations with headquarters in Wales *could* (and according to some stakeholders *does*) lead to developers establishing themselves in Wales, with profits and benefits flowing to owners who are neither local nor firmly based in Wales. Thus, just because a project meets the government definition of local ownership, does not guarantee wealth is retained in Wales or that that wealth is circulated in our economy.

Community Energy Wales research shows that of the 1.5 GW target, [only 33.4 MW or 2% is 'community owned'](#).⁴ We need to ensure that local and community ownership reflects where wealth flows and how it helps to ensure economically disadvantaged communities are supported to meaningfully engage in community ownership of energy in their area. I want to see that such models demonstrably deliver long-term social value. Tracking the impact of investment in this sector would be beneficial.

I advise that as part of the Renewable Energy Sector Deal:

- Welsh Government review the definitions of community and local ownership and review the social value outcomes of community ownership compared to local ownership.
- Set separate targets for them (grounded in the evidence identified in the technical assessment of balancing potential action).

Shared ownership

In 2017, Welsh Government set the expectation for *'all new renewable energy projects to have at least an element of shared ownership from 2020.'*⁵ Mandating shared ownership ensures that

³ Local ownership is defined as: *'Energy installations, located in Wales, which are owned by one or more individuals or organisations wholly owned and based in Wales, or organisations whose principal headquarters are located in Wales.'*

⁴ Welsh Government define community ownership as *'a renewable energy or renewable storage development located in Wales, which is wholly owned by a social enterprise whose assets and profits are committed to the delivery of social and/or environmental objectives.'*

⁵ Shared ownership is defined as *'a project owned by more than one legal entity,'* with examples of *'where the ownership of a project is shared between a developer and a community group, individuals, landowners, or a public sector organisation'* also encompassing projects which *'involve more than one commercial organisation.'* The definition continues: *'in order to be considered as a shared ownership project under the target set by the Welsh Government, we would expect one or more of the owning bodies to be in one of the categories included in the definition of 'local ownership,'* which is discussed above.



there is a level playing field available for developers, and owning an energy asset contributes towards community revitalisation, public support for energy projects, and further community owned business creating good local jobs. I welcome that Welsh Government, in establishing [Ynni Cymru](#) and in its support of [Community Energy Wales](#), are attempting to accelerate community and shared ownership of renewable projects.

However, research by Community Energy Wales concludes that very few projects submitted to PEDW since the introduction of the guidance, have a shared ownership proposition that includes a community counterparty. The commercial development sector needs further support to offer shared ownership to Welsh communities. One area of difficulty is the late entry of community counterparties in the project stage with their finances. It has led to a position where they are reluctant to enter shared ownership opportunities. Developers need confidence that shared ownership can be delivered through models and mechanisms consistent with the usual way of doing business, while delivering better projects for both developers and host communities.

The [Alwen Forest onshore Wind Farm](#) is a pioneer in the shared ownership model in Wales. RWE was successful in the Alwen tender run by Natural Resources Wales (NRW) and Dŵr Cymru Welsh Water for an option to develop a renewable energy project in the Alwen Forest located in both Conwy County Borough Council and Denbighshire County Council. The model allows for a community to own 15% of RWE's project as an equity investment. This agreement has been signed by both Ynni Cymunedol Cymru and RWE in a Statement of Understanding. Whilst there are limits to what we can expect shared ownership to achieve for communities - it is not a panacea - embedding community wealth-building requirements within public investment would help drive meaningful social and economic change.

I advise that as part of the Renewable Energy Sector Deal:

- Government mandates a meaningful offer of shared ownership, requiring that all new renewable projects above 5MW have a minimum level of community and local ownership which would ensure that communities always have a stake in projects in their area (for example [the IWA has called for 15%](#)). Ensure that offers for shared ownership are transparent, fairly priced and backed by binding legal agreements. Legislation could include planning revisions and repowering proposals.
- Establish a national public register of all renewable developments and shared ownership opportunities, updated in real time.
- Ensure the community stake is protected if the project is sold, with a right of first refusal for communities to expand their stake.



- Provide support and guidance for both developers and communities and ensure that this support reaches those areas with high numbers of households on low or no incomes, to build an inclusive energy transition.

(6) Energy communities, local energy markets, micro grids and energy bills

Whilst some of these issues (points 6-7 below) might be outside the direct scope of the Renewables Sector Deal, given powers established in the Well-being of Future Generations Act, I have an interest in the role that public bodies and anchor institutions can play in creating the conditions for a fairer energy future.

The Deal makes a commitment to provide clarity on consenting for grid infrastructure and undergrounding policy, informed by the findings of the [Independent Advisory Group on Future Electricity Grid for Wales](#), of which my team was a part. I welcome the intent to engage industry in shaping grid investment priorities, ensuring community groups are included, achieving net benefit for biodiversity, and collaborating with network companies and innovation programmes to enable cable ploughing is considered for specific routes.

I would ALSO like to see the Renewable Energy Sector Deal accelerate the potential opportunities of energy communities, local energy markets and micro grids. The benefits of these are that you can:

- Meet energy needs locally
- They can take place without larger scale grid infrastructure required - a distinct problem facing Wales
- You can pass on the benefits of cheaper energy directly to the communities hosting infrastructure, with the potential to reduce bills. This enables a more dynamic, locally focussed, community-based energy system which meets the needs of specific locations.

For the public, rising energy bills appear to make the renewable energy transition feel like a cost rather than something that will lower their bills in the long term. This is a distinct issue in Wales, where the equivalent of a quarter of households live in fuel poverty. And it is clear that communities located closest to renewable energy developments believe they should benefit from cheaper electricity.

Many of the tools to reduce energy bills remain outside of Welsh Government's control, as they are set by UK Government and overseen by a UK-wide regulatory system. What *could* be done at devolved level would be smaller and more localised interventions. Wales could pioneer such an approach as it is within devolved capability to achieve, enabling smaller, more localised responses.



I have heard first hand of some of the aspirations of the Local Action Energy Plans in this area. More information is needed on the scalability of this approach to ascertain what role it must play in Wales' energy future as part of a broader energy strategy to state where it will be tried, what it will aim to achieve and how it will be funded. But it should be a priority.

One of the key levers for change sitting at the devolved level is how the resources of public bodies and anchor institutions are managed, and how these bodies procure their energy. Local Authorities in particular are responsible for decisions on most energy developments under 350MW. A lot can be achieved to match local opportunity to local need within this limit. Some of this change could take place by Welsh Government setting a target for the amount of energy used by public bodies which comes from local or community owned projects, with the aim of increasing further collaboration.

I would like to see public bodies procuring their energy from projects they own or jointly or with communities. This aspiration is made clear in my [Future Generations Report](#), which recommends that *'public sector organisations should increase their collaboration with local energy projects by leasing land for joint ventures and committing to purchasing the electricity.'* If public bodies save money on energy procurement, then they could pass that saving on to the communities they serve, or invest it further, bringing other local benefits. This would be a worthwhile endeavour and use of available resources and would help tackle socio-economic inequalities at a local level.

Having clear parameters and commitments for a more local approach to energy is vital as Wales has the potential to roll this out in some of Wales' most deprived communities or in areas with a strong industrial need for cheaper energy to incentivise businesses to set up. This would enable public bodies or Welsh Government to start delivering projects for specific purposes quickly, without needing to wait for longer-term and larger projects to get connected. Indeed, this approach foregrounds the role of local government and anchor institutions as well as the broader economic regional thinking exemplified by Corporate Joint Committees (clustering of certain energy demanding sectors, for example).

I advise that as part of the Renewable Energy Sector Deal:

- There is a need for more resourcing and support nationally for smart local energy systems and micro grids to include advice on potential impacts for natural, historic and built environments.
- Welsh Government works with the UK Government to enable the creation of Energy Communities, so that communities can develop and own energy projects at a small and



medium scale, and to bring in long-term price mechanisms for local and community supply and trading underpinned with a price guarantee.

- Push for the mandating of suppliers to facilitate energy communities by providing balancing, settlement and billing services.
- Public sector organisations should increase their collaboration with local energy projects by releasing land for joint ventures, sharing infrastructure and committing to purchasing the electricity.

(7) Public bodies' role: planning, natural assets, the estate, and partnership.

Wales' renewable energy future is inextricably related to how we choose to use our land. As Wales is a particularly rural nation, the question of how we choose to use our land in the long term needs to be raised. An inclusive narrative for change, that speaks to both urban and rural communities will therefore be vital. This is also linked to how renewable energy projects can support wider restoration of our natural environment.

In my [Future Generations Report](#), I recommended that when Welsh Government next reviews [A Future Wales](#) (which understand could be in 2027), it should “*develop an integrated land and marine use framework that balances commitments to restore nature, deliver new energy infrastructure, housing, food production, and improve climate resilience*”.

Welsh Government, its state-owned enterprise [Trydan Gwyrdd Cymru](#), and national bodies like NRW should serve as best practice in how we expect projects and well-being benefits, to be delivered. In practice this means demonstrating best practice in involving and engaging with communities, delivering environmentally sound projects with community and shared ownership. These projects should also demonstrate excellence in delivering long-term social value and be best practice in monitoring impact. All of this would trickle down into other projects developed and co-delivered by public bodies.

The potential for renewable energy on the public estate in Wales is significant, and I welcome the strategic focus on transforming government-owned land and buildings into clean energy generators to meet net-zero targets. I am working with [Ystadau Cymru](#) to support estate and asset managers across public bodies to put climate and nature targets at the heart of their plans. Key areas of potential include forestry (large scale wind) and public buildings (rooftop solar and heat).

In taking these initiatives forward, and as part of the Deal, there needs to be explicit recognition that nature is one of the best ways of tackling the climate crisis through decarbonisation and adaptation. Natural assets, protected areas, peatland, coastal buffers, environmentally sensitive



marine areas and wildlife havens must be protected. Wales is already one of the most nature-depleted countries in the world and NRW's recent [State of the Natural Resources Report](#) (SoNaRR) shows the extent to which biodiversity is in decline, with many key species and habitats under pressure. Nature loss, climate change, and pollution/waste are identified as the three main, intertwined, and intensifying challenges

Any proposed changes or adjustments to planning policy and guidance set out in the Deal should be consulted on with local planning authorities, consenting bodies, the Welsh Local Government Association, communities, and nature conservation experts. Impacts on landscape, nature, cultural assets and rural tourism should be mitigated against - there is no point solving one problem by worsening others.

I would like to see a moratorium on the development of all SSSI and irreplaceable habitats, and for Welsh Government to produce clarity on what constitutes and does not constitute a 'wholly exceptional circumstance' (WEX) in the context of [chapter 6 of Planning Policy Wales](#). This should include reference to, *inter alia*, the locational nature of the test, the Wales-wide geographic scale at which sequential site selection should take place and clarification that the WEX test is the first of a series of stepwise tests, each of which must be surmounted by the developer before addressing the next steps. Clarity is needed as it will be key in ensuring critical habitats for nature and people such as the Gwent Levels where over a third of the SSSI are at threat from proposed solar power stations. We need clean renewable energy, but this must be placed where it doesn't damage nature, we want to see the right technology in the right place. The Wildlife Trusts Wales argue that "*mitigation proposals are never fully implemented, monitored or maintained so are meaningless.*"

I advise that as part of the Renewable Energy Sector Deal:

- There is an explicit recognition that nature is one of the best ways of tackling the climate crisis through decarbonisation and adaptation. Therefore, key carbon habitats such as trees, peatland and coastal habitats should not be disturbed or destroyed.
- There is a moratorium on the development of all Sites of Special Scientific Interest and protected areas, and on irreplaceable habitats, which should include habitats that through restoration would qualify as irreplaceable habitat such as degraded peat.
- Welsh Government should produce clarity on what constitutes and does not constitute a 'wholly exceptional circumstance' in the context of [chapter 6 of Planning Policy Wales](#).



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Dyfodol
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In conclusion:

Thank you for the opportunity to present my advice. I am planning on sharing this letter with stakeholders who attended the Roundtable on 5 December and partners including the Welsh Local Government Association in the spirit of openness and transparency, which are values I am committed to honouring in carrying out this role.

I hope you and your team can consider my advice without delay with a view to it shaping the drafting of the Deal. If you require any further information, I would be pleased to provide it and attend a meeting of the Task and Finish Group if this was felt to be useful.

There is a lot to play for, but we must get the balance right in terms of securing sector commitments that improve social, economic, environmental and cultural well-being for future generations.

If the Deal is approved, a clear delivery strategy and realistic timescales must be established, along with clarity on who is responsible for oversight. This will help improve transparency and accountability.

Yours sincerely,

Derek Walker

Future Generations Commissioner for Wales