

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

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					
		X					

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

While we agree with the spatial strategy, we believe that the investment must match the vision, and that high importance should be given to infrastructure and an integrated transport structure.

3. Affordable Housing (policy 5)

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?

Disagree

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

The Welsh Government's recognition of the urgent need to build and develop more affordable homes in Wales is encouraging. However, it is the practical question of how this can be achieved that is problematic, and the Welsh Government's role in assisting with the practical barriers to delivery is key.

In order to deliver at scale and pace, as identified in the Affordable Housing Review, modern methods of construction must be further explored. The issues currently preventing wide adoption of such methods also need to be identified and addressed. The Welsh Government should directly assist with establishing building performance guidance and standards for this type of construction, to ensure that quality, as well as quantity, is achieved. Such requirements need to be developed directly in consultation with newbuild warranty providers and lenders, to reinforce confidence in the process.

When determining how funding can be effectively allocated, investment should be directly linked to those projects which seek to develop homes, in a way which helps achieve the general outcomes of the Framework. The success of the Innovative Housing Programme lays the foundation for what could, drive a successful affordable strategy housing in Wales. The programme has resulted in projects which have encouraged collaboration and energy efficient solutions, which in turn help take the decarbonisation agenda forward. The allocation of funding for the creation of near zero-carbon homes will serve to incentivise both public and private sector house builders, to create a future housing stock which is fit for the future.

Whilst there are, admittedly, efforts to resolve the housing crisis through the construction and development of new homes, the policy is currently silent on existing homes. The Welsh Government could help unlock the vast amount of existing, empty homes in Wales, which could also contribute to current supply issues.

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?

Disagree

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?

While we acknowledge that private enterprise can be an effective way of rolling out charging infrastructure, and that the Welsh Government plans to keep under review the pace and geography of installations; we should monitor which organisations are installing what type of charge points, and whether they are installing them at all.

The lack of charging infrastructure is a major barrier to people investing in electric vehicles to date. So, we question whether the Welsh Government should take a more pro-active role in developing infrastructure, rather than relying on private enterprise.

Inter-operability issues must also be considered in the development of a charging network. For example, Tesla charge points will only charge Tesla vehicles. At the upper end price bracket of the electric vehicle market, these vehicles are not as accessible to a wide range of the public; as opposed to Nissan and Renault models. The Welsh Government needs to make sure that any proposed infrastructure meets the needs of the many, not the few.

There is also concern that non-Welsh companies could be responsible for installing charging infrastructure, with funds generated from charging syphoned out of Wales. These concerns are particularly prevalent with major players such as Shell and BP entering the market, as a complement to their petrol and diesel fuel court offerings.

We understand that Welsh-based charging company, Trydani, is attempting to install electric charging infrastructure throughout Wales, linking the infrastructure with community energy ownership. This should be explored by Welsh Government further.

In addition to this, Welsh Government should ensure that Electric Vehicle Infrastructure is included within all local authority planning strategies. All new developments should contain charging infrastructure, such as new supermarkets or housing developments, to promote the use and accessibility of public charge points.

Welsh Government will also have to be innovative in its approach to charging infrastructure for those houses which have no off-street parking, which is prevalent in many Welsh communities.

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?

Disagree

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					
		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?

It is unclear how the policy will meet the targets of:

- 1 GW of renewable energy capacity to be locally owned by 2030
 - New renewable energy projects to have at least an element of local ownership by 2020.
- It is stated that "Large scale renewable energy schemes can generate direct social and economic benefit to local communities across the country. Local ownership of projects in whole or part can ensure these benefits are accrued over the long-term, generating funds to develop community facilities and help address fuel poverty.

It would be useful for the policy to set out how local ownership is to be promoted both inside and outside Priority Areas, other than the above statement. We would recommend that the policy reflects a use of diverse renewable energy sources. Solutions could include hydrogen, and we understand that Hydrogen Cymru has submitted their comments on this framework. Hopefully other renewable energy stakeholders have done the same to provide the technical detail required to support an effective policy.

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.

Agree

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?

Agree

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?

Agree

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?

Agree

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.

While we broadly agree with the principle of developing Strategic Development Plans, prepared at a regional scale, we comment that regional and local cannot be taken in isolation and needs to be considered on a national level. For example, towns which are close to both regions, such as Bridgend, will be impacted by the Strategic Development Plans of 2 regions, so it is important that development is co-ordinated at a national level.

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?

As a Welsh law firm with several Welsh-speaking clients and employees, we are keen to see the Welsh language treated no less favorably than English. We welcome the NDF's consideration on the effects it will have on the Welsh language and envisage that a well-developed infrastructure network with improved connectivity will have a positive effect.

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 Response

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?

There is no text box in which we can provide a comment to Question 6 regarding Green Infrastructure so we provide below:

Question 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?

We believe that Welsh Government's approach could go further in relation to maintaining and enhancing biodiversity and ecological networks.

Welsh Government could pledge to work closely with local communities, to enhance biodiversity and increase woodland cover – given the backdrop to the backlash of the 'Rewilding Britain's Summit to Sea' programme in mid Wales by farmers. It is important to work closely with communities that could be affected by similar proposed schemes, so that community buy-in is engaged and the potential for rejection lessened.

Although the Welsh Government's target of at least 2,000 hectares per annum from 2020 is admirable, we query the feasibility of the scale of growth of the forest. This is given the land available to Welsh Government to meet this requirement, without impacting upon farmland, meadowland etc. It is also unclear how big the forest would be, and when planting will eventually cease.

We also believe that community groups could play a large role in growing, maintaining and cultivating the national forest, and should be supported by Welsh Government. Community groups could also assist Welsh Government with community buy-in. An example of a successful forestry community group is "Welcome to our woods" which is a community partnership in the Upper Rhondda Fawr, South Wales. The partnership helps to deliver a greater social impact in the Upper Rhondda.

Welsh Government should pledge their support to community groups trying to improve their environments, with grant funding and loans. This will help the development of the national forest and to improve biodiversity.

Finally, it is unclear what "green infrastructure" means. This should be clarified by Welsh Government.

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

Stuart Pearson

Organisation (if applicable)

Capital Law Limited

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