

# 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

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

*No Response*

## 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?

No opinion

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

*No Response*

## 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?

Agree

## 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?

*No Response*

## 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?

Neither agree nor disagree

## 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?

Neither agree nor disagree

## 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?

Neither agree nor disagree

**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.**

The Crown Estate is generally supportive of the outcomes and policies within the National Development Framework (NDF) document, and we welcome the opportunity to be involved in this consultation. We believe that it is important for planning policy to remain integrated with other related plans and policies, and whilst there is reference to the Welsh National Marine Plan (WNMP) at the start of the draft NDF document, the links between the marine and terrestrial plans could be strengthened. There is an opportunity for the NDF to support the policies within the WNMP in order to provide a consistent approach to planning across Wales.

In addition, it would be useful for the NDF to provide an outline of how it is anticipated to integrate with other planning documents, for example, the Regional Development Plans, Local Development Plans, Area Statements etc. Some guidance on the implementation and practical use of the NDF alongside these other documents going forwards would be invaluable to ensure maximum benefit is obtained.

Throughout the NDF we are pleased to see that there is recognised support for renewable energy, with particular reference to wave and tidal. We would recommend the reference is also extended to include offshore wind (both fixed foundation and floating), which will be essential to help Wales achieve its renewable energy targets of 70% of electricity consumption from renewable energy by 2030. There will also be a requirement for associated onshore infrastructure to support the offshore renewables projects, e.g. cable infrastructure, operations and maintenance bases, landfall sites etc. In North Wales, Anglesey has been highlighted as the 'renewable energy island' which we welcome, (although it is noted that the regional summary map does not highlight the renewable energy potential for this area). Also with the potential for Round 4 offshore wind project sites in this wider area, we feel that recognition of the requirement for the supporting onshore infrastructure, along with further interlinkages to the WNMP, would be beneficial.

With regards to marine aggregate resources, we recognise the challenges associated with managing competing land uses where land is limited and in high demand. However, we see that the continued safeguarding of wharf and transport infrastructure will become ever more essential to enabling a sustainable long term supply of marine aggregate.

The revised National Planning Policy Framework (2019) for England provides support for wharf facilities by outlining that "Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working". Similar wording for the redevelopment of port and/or wharves may be useful to ensure that conflicting activities are actively avoided and the vital role of marine aggregates in supporting construction of housing and infrastructure is both recognised and safeguarded.

In addition, there would be benefit from including reference to the WNMP in relation to marine aggregates in regions where Strategic Resource Areas (SRAs) for marine aggregates have been outlined, to ensure that the appropriate wharf facilities are maintained. As mentioned previously, the link up and continuity between marine and terrestrial planning documents is key.

Finally, with reference to policies 8 and 9 and question 6 above, we are supportive of the approach to maintaining and enhancing biodiversity and ecological networks, however, we would emphasise the importance of evidencing the need for, and appropriate level of, safeguarding before future development opportunities are restricted.

## **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 Response*

### 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 Response*

### 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 Response*

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?

*No Response*

### 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**

Rosie Kelly

**Organisation (if applicable)**

The Crown Estate

**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*