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To: [NDE](#)
Cc: [REDACTED]
Subject: MTCBC - NDF Consultation Response
Date: 23 October 2019 12:05:10
Attachments: [Final mtcbc NDF response.rtf](#)

FAO: The NDF Team, Planning Policy Branch

Please find attached the Merthyr Tydfil County Borough Council response to the National Development Framework public consultation. I would be grateful if could can confirm safe receipt.

Regards,

John Raine

Arweinydd Grwp Polisi Cynllunio / Planning Policy Group Leader

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Croesawn ohebu yn Gymraeg a fydd hyn ddim yn arwain at oedi.

Mae'r e-bost hwn ac unrhyw ffeiliau a drosglwyddir gydag ef yn gyfrinachol ac wedi'u bwriadu ar gyfer pwy bynnag y cyfeirir ef ato neu atynt. Mae cynnwys yr e-bost hwn cynrychioli barn y sawl a enwir uchod, felly nid ydyw'n dilyn ei fod yn cynrychioli barn Cyngor Bwrdeistref Sirol Merthyr Tudful.

Darllenwch ein [hysbysiau preifatrwydd](#) i ddarganfod mwy am sut rydym yn defnyddio eich gwybodaeth bersonol.

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Consultation Response Form

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Organisation (if applicable)	Merthyr Tydfil County Borough Council

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"/>	

- 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 type="checkbox"/>	<input checked="" 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 high level outcomes, set out alongside the spatial strategy, are generally supported. Some of the outcomes are by their nature aspirational and their delivery will be dependent on other plans, policies and programmes in addition to delivery through development plans, for example, in relation to objectives 4, 7 and 8 regarding Welsh Language, transport and broadband service. Realising these outcomes will also require continued investment and support for organisations charged with implementing these objectives. This should be acknowledged in the 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	Don't know	No opinion
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:

The focus on existing urban areas and the sequential approach towards locating new development within towns and cities is welcomed. This follows the site search sequence set out in PPW. It is considered however that there should be some acknowledgement within the NDF that the loss of greenfield land adjoining exiting settlements, may be necessary in order to support growth (for example at pages 22 and 24) as part of the prioritised sequential search for site allocations to make provision for regional growth needs.

The deliverability of growth aspirations and spatial strategies will become clear following assessment of candidate sites promoted for Strategic Development Plans and reviewed LDPs. Therefore, to avoid the NDF preventing development proposals that may be necessary to meet regional needs, and to protect other rural areas, it is considered that the fourth and fifth paragraph on page 24 could be expanded to explain that following the sequential approach to allocating sites, some new greenfield development to existing settlements (including those which are not specifically identified as regional growth centres) may be necessary to meet regional growth needs. This clarification would not be contrary to NDF policies 1, 2 or 3 as new growth in these locations would need to be justified in line with the sequential site search sequence.

The reference under policy 1 to delivering high density developments and the commitment to excellence in urban design on pages 26 and 27 are welcomed. It is important that higher density development and the promotion of the efficient use of land do not come at the cost of poor design. It would be appropriate to cross reference to PPW planning principles and placemaking outcomes here.

Policy 2 seeks to ensure that proposals for new public service facilities of a significant scale should be located in town and city centres and requires a sequential approach to considering site allocations and planning applications. This approach to locating new development of a significant scale is supported. However, the statement that public service facilities of a significant scale should only be approved outside of town and city centres in exceptional circumstances is questioned. This could be overly restrictive where there is a need for large scale public services to be appropriately located elsewhere within settlement boundaries and on sites which are easily accessible by a range of modes of sustainable transport. Should the policy be amended to make reference to other locations with good public transport access within towns and cities?

Other strategic spatial issues that should be recognised and addressed by the NDF strategy include strategic transport and long term east – west regional connectivity in South Wales in light of the decision not to progress the M4 relief road.

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"/>	

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

The policy requires that Strategic and Local Development Plans develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. It is understood that updated guidance on producing LHMA's will be developed and the continued emphasis on evidence based policy in the NDF is welcomed.

The NDF sets out the affordable housing 'delivery gap' and the Council is generally supportive of measures to increase the supply of affordable housing. In Merthyr Tydfil County Borough 127 affordable units have been delivered over the last 5 years (when compared with overall housing completions of 518) and the adopted LDP affordable housing target has been met. Of these affordable housing completions, 118 affordable units were delivered as part of 100% affordable housing developments. The majority of these sites were under public ownership and were delivered by RSLs.

Whilst increasing delivery through affordable housing led developments is welcomed it is considered that an important contribution to affordable housing delivery will continue to be through private sector house building, including on-site provision and financial contributions. Development viability evidence will therefore continue to be an important consideration in identifying deliverable affordable housing targets and demonstrating realistic growth strategies.

Care needs to be taken that WG's policies on housing don't push volume house builders out of Wales.

Policy 5 advises that SDPs and LDPs should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing to address the delivery gap. This is in line with the position set out by the Minister in her letter dated 8 July 2019, although the policy does not reference the 50% affordable housing requirement for such sites. The current wording of the policy, which excludes reference to a specific provision level for affordable housing led schemes, is supported as it is considered that the NDF policy should be sufficiently flexible and local and regional affordable housing policies should remain evidence based.

It is assumed that under this policy a development plan's potential contribution to affordable housing would be evidenced as part of plan preparation, for example as part of candidate site assessments, the identification and assessment of publicly owned land and through discussions with RSLs and landowners in bringing forward affordable housing led sites. The supporting text under policy 5 recognises that the affordability of housing is not uniform across Wales and that different responses will be needed in different parts of Wales to meet the needs of local communities and this approach is welcomed.

It is understood that PPW will be updated to incorporate the policy direction set out in the Ministers letter of 8 July 2019. This update should consider the relationship between local affordable housing needs evidence, development viability evidence and the potential contribution of affordable housing led sites in setting realistic affordable housing delivery targets in SDPs/LDPs.

Housing Requirements and Delivery

With regards to the estimates of additional homes that have been identified, these are derived from the Estimates of Housing Need in Wales by Tenure (2018-based). It is understood that these provide estimates based on a given set of assumptions and are aimed at informing policy decisions and should therefore not be used as a housing target. Given the use of a single figure in the regional sections of the NDF, the use and interpretation of this figure should be explained particularly given the NDF will need to be understood by a wide range of people who will engage with the planning system. Given the importance of this figure, this could include a cross reference to the relevant section of PPW.

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"/>	

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

The policy provides a presumption in favour of new mobile telecommunications infrastructure within Mobile Action Zones, provided that there are no significant adverse landscape impacts. These zones are not yet identified but should be included in the finalised NDF or an explanation added with regards to where such zones will be published to provide clarity to the policy. It is comforting that the NDF recognises the importance of the landscape, LPA's have designated Special Landscape Areas which should form the basis of assessments of landscape impacts.

4. 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 checked="" 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 policy to support the increasing use of ultra-low emission vehicles and to work with local authorities and other key organisations is supported. A flexible approach is likely to be required in order to deliver and 'main stream' this infrastructure as part of new developments, particularly given that it is likely that the technology will develop and costs will change. Changes to national design standards can be included in PPW or building regulations updates as necessary. Therefore, the NDF policy as currently worded is considered to be appropriate.

5. 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"/>

Generally agree with the overall aim of the policy given this is consistent with the Environment (Wales) Act and PPW. However, it is considered a number of clarifications are required regarding the proposal to safeguard land potentially important for to maintaining and enhancing biodiversity and ecological networks.

The policy states that Welsh Government and its key partners will identify areas to be safeguarded and other areas of land with opportunities to improve ecosystem reliance. The supporting text (at the third and fifth paragraphs) advises that the issue should be considered as

part of lower level SDPs and LDPs and the areas to be safeguarded should be identified through Green Infrastructure Assessments. It is considered that this issue is best addressed as part of SDPs and LDPs given the scales of sites and level of detail that will be required. The first statement of the policy should therefore be amended to clarify such sites should be identified as part of SDPs and LDPs, consistent with the approach set out in the supporting text. It is understood that guidance for preparing Green Infrastructure Assessments will be developed by Welsh Government and published in due course.

In addition, the NDF text should also clarify how safeguarded sites relate to existing designations such as SINCs (e.g. are these separate designations and do 'safeguarded areas' or 'designated sites' have the same status as SINCs?). The third paragraph states that SDPs and LDPs should consider how designated sites fit within the wider network of habitats and it is assumed this will include considering existing designations as well as reviewing whether new designations are necessary.

Given the wide range of end users, the NDF should make clear that in meeting future growth needs there may be instances where adverse effects on the environment are unavoidable and in such instances sufficient justification and biodiversity enhancement will be required in line with the stepwise approach set out under national policy.

Finally, with regards to Policy 9, whilst the principle is supported, it is considered the NDF supporting text should include more details for end users in order to clarify the national forest proposals.

6. 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	Don't know	No opinion
Large scale wind and solar developments				X		<input type="checkbox"/>	<input type="checkbox"/>
District heat networks		X				<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 NDF identifies large scale wind and solar priority areas in the south western corner of the Merthyr Tydfil County Borough. These priority areas differ from the local search areas identified

in the MTCBC Replacement LDP. The MTCBC Renewable Energy Assessment identified more limited potential for solar energy in this area. It also identified alternative areas of potential in the north east of the County Borough at Ffos y Fran.

No search areas for wind energy are identified in the Replacement LDP due to the landscape sensitivity of the unconstrained wind energy resource that was identified in the north east of the County Borough. This is in contrast to the NDF study which has identified large scale wind energy potential in the south western corner of the authority area (which overlaps with the NDF solar energy priority area).

The MTCBC Renewable Energy Assessment was prepared using the Welsh Government practice guidance toolkit for local authorities, the differences in results are therefore somewhat surprising. Consultation with the industry, ongoing monitoring of new developments and checking of assumptions, practically in relation to grid connection issues and scheme viability, will ensure the priority areas are realistic in any future updates. There should be scope to further refine search areas in SDPs where these changes can be evidenced.

The NDF wind and solar priority areas proactively identify large areas where there would be a presumption in favour of large scale schemes and an acceptance of landscape change. In addition, a number of impacts that should be considered are referenced in the policy. The supporting text acknowledges that not all of the area within the priority areas for solar and wind energy will be suitable. This approach is supported given the detailed issues and impacts that will need to be considered at the local level.

Existing guidance relating to renewable energy development, and their impacts, should be cross referenced in the supporting text. The NDF should also clarify whether the boundaries of the renewable energy priority areas should be illustrated on the proposals maps of lower level plans at plan review stage. Whilst the absence of these shouldn't give rise to a general conformity issue it would help to the policy approach at a local authority boundary level. To assist in the interpretation of the identified priority area, clearer plans should be attached to the final NDF alongside with any necessary disclaimers.

7. 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>
X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

The Council supports the development of regional Strategic Development Plans and the range of policy issues covered in policy 16. Merthyr Tydfil CBC has agreed to be part of a SDP for the Cardiff Capital Region.

Clarification is sought on the following issues:

It is assumed that reference to “Gypsy and Traveller Need” extends to include both pitch need as well as regional transit / temporary stopping place need and provision. This should be clarified.

Whilst strategic transport issues will need to be considered as part of other plans (i.e. in local and regional transport plans) it is considered that strategic transport policy and infrastructure needs should also be considered and set out in regional SDPs given the importance of transport policy and infrastructure to deliver growth strategies. Therefore, it is considered that the reference to “the location of key services, transport and connectivity infrastructure” in policy 16 should be amended to clarify SDPs should consider strategic transport needs and provision rather than setting out their location.

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.

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

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

10. 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	Don't know	No opinion
<input type="checkbox"/>	<input checked="" 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.

The NDF identifies Merthyr Tydfil as a Centre of Regional Growth alongside Bridgend, Pontypridd, and Caerphilly. Cardiff and Newport are identified as Centres of National Growth. In addition, the South Wales Valleys are located within a 'National Growth Area'. The identification and status of Merthyr Tydfil in the NDF is welcomed and supported, particularly given the Council's regeneration objectives and sustainable population growth strategy proposed in the Replacement LDP covering the plan period 2016 – 2031. Reference to how further regeneration can be achieved through the use of sustainably located brownfield sites is supported as is the importance of preserving and enhancing the regions cultural heritage with quality development (page 65).

This NDF differs to the previous Wales Spatial Plan approach which identified a larger number of 'Primary Key Settlements' and 'Strategic Opportunity Areas' which Local Development Plans needed to have regard to in their preparation. Under the Planning (Wales) Act 2015 however, the National Development Framework will comprise a formal part of the development plans system in Wales and lower level Strategic and Local Development Plans will be required to be in 'general conformity' of the NDF.

Ultimately, the location of future growth will take place where deliverable sites are identified or where regeneration proposals are identified and considered appropriate for allocation driven by the overarching policy stance of the NDF. This will depend on the candidate sites promoted by landowners, developers, local authorities and other public bodies in the preparation of SDPs and in future LDP reviews. Overall it is considered that the general wording of the NDF should provide sufficient flexibility to bring forward a range of development proposals as part of future SDPs, although in some areas this could be clarified.

It is noted that a discrepancy exists between the regions in how 'Centres of Regional Growth' are referenced, for example there is a specific policy on regional centres in the Mid and West Wales region (Policy 24) but no such policy for the South East Wales region; surely this approach should be consistent across the 3 regions?

It is understood the regional key diagram is indicative and more detailed proposals would be refined as part of the SDP. However, without further clarification the key diagram for South East Wales could be misinterpreted.

The regional key diagram illustrates that the South Wales Valleys are located within a National Growth Area, and specific Regional Growth Centres have also been identified at the NDF level. Additional allocations may be required in other settlements located within the National Growth Area but which fall outside the specified Regional Growth Centres. This will depend on the candidate sites promoted by landowners and developers as part of the preparation of SDPs and LDPs. Where allocations are needed outside of the Centres of Regional growth (where development opportunities, which may be larger in scale, are promoted and can be justified), the site search sequence set out at pages 22-24 and under policies 1-4 and PPW should be referenced and clarified as there will be a need to set out a settlement hierarchy and deliverable SDP growth strategy (as required by NDF policy 16) that will build on / refine the regional key diagram whilst also demonstrating it is in general conformity of the NDF.

Policy 29 supports regeneration and investment in the Heads of the Valleys area, whilst this is welcomed it would be helpful if the supporting text expanded on this by providing more detail on how prosperity will be increased and social equalities addressed. Reference should be made to the opportunities presented by the dualling of the A465 which will vastly improve access to the Head of Valleys, and it is considered that the NDF should advocate that full advantage of this infrastructure be taken by encouraging new employment and tourism opportunities along the A465 corridor. Additionally, the Heads of the Valleys area should be identified spatially on the plan.

Policy 31 states that development and growth in the region should be focussed in places with good active travel and public transport links and that land in close proximity to existing and committed mainline railway and metro stations should be the focus for development. The aim of the policy is supported, however, it should be acknowledged that there will be some need for developments elsewhere (e.g. in rural areas) and it is considered that the sequential site search sequence of national policy should be referenced. This will enable local authorities to more clearly justify how specific site allocations would comply with the overall aim of this policy.

South East Wales Key Diagram

More specific remarks on the South East Wales key diagram are provided below:

The importance of East - West links should be recognised on the key diagram particularly to recognise the reliance on the M4 corridor and importance of alternative travel.

A key diagram title and disclaimer statement to explain its interpretation should be added. This will be useful given the document will be used by a range of people including non-planners and members of the public. In addition the symbols for the Metro and Valleys Regional Park are misleading being identified in one position and could be misinterpreted; furthermore, it doesn't highlight their significance to the region by being identified as they are.

11. 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.

No comment.

12. 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?

No comment.

13. 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 favourably than English.

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

The outcome to increase the number of Welsh language speakers by 80% by 2050, in line with other Welsh Government policies, is challenging and will rely on a number of policy areas and public bodies to help deliver the outcome. The NDF does not include a policy on Welsh Language and this approach is supported as it is not considered necessary to include a specific policy as part of a national level development plan. Sustainability Appraisal assessments should be realistic in the planning system's role in helping to deliver this outcome and should acknowledge cross cutting issues in achieving the outcome.

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.

No further comments.

14. 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?

The development plan system is predicated on an evidence base that demonstrates the viability and deliverability of proposals. There is no such evidence to support the NDF outcomes or to demonstrate they are deliverable.

Disappointingly, the NDF makes no reference to addressing the M4 congestion and the consequential adverse impact on the economy of Wales. The NDF proposes economic growth but is silent on the M4, this is considered to be a significant omission from the 20 year spatial development plan for Wales.

15. 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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