

**From:** [Adrian Humpage](#)  
**To:** [NDF](#)  
**Subject:** National Development Framework - Consultation Response from Powys County Council  
**Date:** 15 November 2019 15:48:20  
**Attachments:** [image001.jpg](#)  
[Powys County Council Response to NDF Consultation.pdf](#)  
**Importance:** High

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**NDF Team, Planning Policy Branch,  
Welsh Government,  
Cathays Park,  
Cardiff,  
CF10 3NQ**

Dear Sir / Madam,

Thank you for the opportunity to respond to the consultation on the Draft National Development Framework.

Please find attached the formal response on behalf of Powys County Council.

The Council would be happy to further discuss the issues raised in the response, and to work with you and your officers to facilitate an ambitious and fit for purpose National Development Framework.

The Council would appreciate it if you could confirm receipt of this email and the Council's response by responding to [ldp@powys.gov.uk](mailto:ldp@powys.gov.uk)

We look forward to hearing from you in the near future.

Yours faithfully

**Dr Adrian Humpage**  
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Cyngor Sir Powys County Council  
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Ffon /

Ebost / Email:



Cysylltwch â ni yn Gymraeg neu yn Saesneg. Ni fydd cysylltu yn Gymraeg yn arwain at oedi.

Contact us in Welsh or in English. Contacting in Welsh won't lead to a delay.

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Mae'r e bost hwn ac unrhyw atodiad iddo yn gyfrinachol ac fe'i bwriedir ar gyfer y sawl a enwir arno yn unig. Gall gynnwys gwybodaeth freintiedig. Os yw wedi eich cyrraedd trwy gamgymeriad ni ellwch ei gopio, ei ddosbar hu na'i ddangos i unrhyw un arall a dylech gysylltu gyda Cyngor Sir Powys ar unwaith. Mae unrhyw gynnwys nad yw'n ymwneud gyda busnes swyddogol Cyngor Sir Powys yn bersonol i'r awdur ac nid yw'n awdurdodedig gan y Cyngor.

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<u>Organisation (if applicable)</u>	<b>Powys County Council</b>

**National Development Framework**

**Consultation Response Form**

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

The outcomes are confused. Some read as laudable aspiration, others as a desired outcome whilst some are presented as statements of fact and are not forward-looking. Contrary to the stated intention of preparing a strategy for a development plan, the outcomes are not well-linked to land-use planning objectives so there is a disconnect with what the NDF should be setting out to do.

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

These appear to be a mix of policy (and legislative?) ambitions for the Welsh Government but they are broadly worded and hence do not all have a place in a statutory development planning document. The Outcomes do not have a strong spatial focus meaning they fail to make appropriate links to the accompanying NDF Policies.

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

The wording of the outcomes can be difficult to decipher in terms of exact relationships to subsequent NDF Policies.

**Outcome 1:** No specific mention of the focus on increasing affordable homes (hence neglects link to Policy 5) or meeting the housing needs of ageing population. Unrealistic to say that cities, towns AND VILLAGES will be physically and digitally well connected – villages especially may not be well-served or well connected. Outcome 1 should relate more definitively to the nationally significant (and regionally significant?) places that the NDF goes on to identify otherwise it is too broad in scope especially as it fails to mention the impact of lower level development plans.

**Outcome 2:** Mention of small towns and villages is welcomed, although the outcome suggests growth is acceptable in ALL small towns and villages. This is not appropriate as the outcome neglects to highlight the **sustainable** settlement hierarchy approach that lower tier plans will undoubtedly adopt.

Support for the agricultural sector and diversification is too specific and fails to mention support of the wider rural economy. As a result, this outcome does not properly reflect Policy

4). If the support is related to specific farming initiatives stemming beyond land-use planning, it is confusing to add this into the NDF context. Similarly, Outcome 6 strays away from land-use planning after the first sentence.

**Outcome 3:** It is of concern to the Council that the defined regions do not align with other regional initiatives, such as Growth Deals. The Council objects to this and considers that a four-region approach is necessary, reflecting the Mid Wales Growth Deal region. It is also noted that references to towns and villages as highlighted in Outcome 1 are not further developed in the regional sections of the document, thus creating a disparity with policies. It is disappointing that the linkages of tiers of plans and settlement hierarchies in the regions is poorly developed.

**Outcome 4:** This outcome should be supported by an NDF policy on Welsh Language. At present there is no policy to implement the management of development in areas of Wales where Welsh is the everyday language. If this policy can be left to the regional and local levels of the development plan through following PPW and TAN advice, then it probably should not feature as an NDF outcome. The NDF should reference the importance of these accompanying documents and how they influence lower tier policy. It is also confusing to talk about a target date of 2050 when the NDF is set to span 20 years to 2040. At present the outcome is focussed on wider Welsh Government aims rather than on how land-use planning contributes to addressing the issue.

**Outcome 5** might be presumed to relate to national growth areas but if so, it does not make a clear link. If it relates to ALL cities and large towns, the relationship of the NDF to lower tier plans (which will control development here) should be made more transparent. It is unclear if Outcome 5 is supposed to apply to both urban and rural situations. The Council also disagrees that cities and large towns are always magnets for growth and investment – depends on scale, location and economic prosperity of the city/large town. Outcome 5 promises investment in new homes, jobs and services in areas *outside the urban centres* – statement lacks clarity not helped by a confusion of terminology – are “*urban centres*” distinct from cities and large towns? Again, this statement does not acknowledge how the spatial strategies of lower tier plans will influence development.

**Outcome 6:** The Council in principle is supportive of the ambition of this outcome, but as worded it fails to recognise the inevitable contradictions between positively enabling growth whilst safeguarding the culture, heritage and environment of Wales (attractiveness to tourists, trusted by businesses). Particularly so when there is a presumption for landscape change in renewable energy priority areas.

**Outcome 7** says too much beyond land use planning. It could start and finish with “sustainable transport infrastructure will be embedded .....

**Outcome 8** seems at odds with other outcomes as it has no accompanying policy. PPW/TAN would be better placed to set the positive planning framework for digital infrastructure which lower tier plans can then reflect. Outcome 8 also focuses on broadband technology whereas NDF Policy 6 relates to the different technology of Mobile Phone communications.

**Outcome 9:** Not worded with clear links to planning/development – very broad focus. It could be worded to start “Development Plans will .....

Outcomes should be accompanied by a Monitoring Framework to capture the

implementation of the policies to enable effective reviewing of the NDF.



## 2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 Council agrees in principle with the approach of the NDF's spatial strategy but not all the finer details or the emergent policy framework.
- It is not clear if Policy 1 is supposed to apply to all towns and cities. If so, the Policy lacks a spatial focus on the nationally significant places that the spatial strategy aims to promote.
- Settlement Capacity Studies should underpin the strategy. Otherwise delivery is at risk.
- It is noted that the presumption against new towns set out in Chapter 4 conflicts with PPW advice which says that these are an SDP matter (3.49 PPW Edn 10).
- The Outcomes section is poorly related to the chapter text justifying the spatial strategy. (For example, co-location is not mentioned as an ambition nor the importance of safeguarding against greenfield sprawl and preventing the squandering of key assets (productive countryside and natural resources). There is a lack of clarity to where and how the policies apply and the relationship to the outcomes, which may result in unintended consequences. For example, applying the policies in more rural towns to ensure access to sustainable transport may result in inappropriate ribbon development along a highway which provides the only public transport link.

- The key principles are not well-related to the later regional chapters.
- “Urban Centres” needs a definition. It is unclear if urban in this context is a population of 10,000 plus or if it is an alternative definition. Otherwise there is conflict between Policy 1 and Policy 4 – and in distinguishing a rural town from an urban town – for example:

Towns in Powys generally meet the definition on page 28 of a rural area (settlements less than 10,000 people) meaning the Council would presume that they are considered to be within Policy 4 which supports rural towns and villages. Rural settlements can grow where “it is appropriate, proportionate to the needs of the settlement and the wider rural areas they serve and where it has been planned”. The identification of two Powys towns as important regional centres/regional growth areas therefore does not accord with Policy 4 which states that the future for rural towns is best planned at the regional and local (i.e. not national) level. Implementing regional growth areas in Powys (Newtown and Llandrindod Wells) through the NDF needs further justification.

- Terms should be explained in a glossary.
- Policy 2 has a strange title – the title does not reflect the purpose of the policy.
- Policies 1 and 2 could perhaps be better addressed by one robust policy for sustainable urban growth in Cities and Large Towns, whether public or private.
- Policy 3 is confusing. In land-use planning terms there is not a distinction between public and private investment, the proposal has to be the right development in the right place. It is unclear how “developments of significant scale” such as the examples referred to in the supporting text be located in town or city centres.
- Policy 3 starts with a general statement which does not act as policy for decision-making. The second statement is potentially better placed in PPW for lower-tier plan making purposes. The sustainable place making outcomes in PPW would be used in site selection and in assessing choices. It is currently unclear how Policy 3 should be used in practice.
- If retained, Policy 3 should not just be for public investment etc. – land-use planning should provide for either private or public schemes of significant scale.
- Policy 3, if retained, should be re-worded to say “Strategic and/or Local Development Plans.....” At present, it presumes all regional areas will be part of a regional plan implying total SDP coverage. This is at odds with other references in the NDF which acknowledge a flexible approach or that Joint LDPs may be more appropriate than an SDP (e.g. page 56).

#### Rural Areas Policy 4:

- Managing sustainable and appropriate proportionate growth in rural areas is welcomed – the NDF is positive and appears to encourage more growth. “Development in towns and villages in rural areas will support local aspirations and need” and this is supported in principle. However, a clearer steer on what is meant by rural areas and how they are “to sustain themselves” should be provided, particularly taking account of sustainable settlement hierarchies identified in LDPs. The Council questions the fit with national sustainable place-

making outcomes as local aspirations/needs may well be at odds with them.

- The NDF should reference the importance of spatial strategies in Strategic and Local Development plans to reduce confusion as to where growth may be acceptable.
- It is of major concern to the Council that only the agricultural sector is referred to in policy to the exclusion of any other component of the rural economy. For example, tourism is an important sector, particularly in rural areas, and is neglected throughout the NDF document, despite it being a WG priority growth sector.



### 3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

- Agree with the approach towards increasing affordable housing and a greater role for RSLs and Local Authorities in this. The Council also supports the principle that there are no affordable housing numbers/targets in Policy as those numbers will change over time.
- The Council considers that it is important that the NDF ensures alignment with the approach taken with respect to affordable housing provision in the LDP manual.
- Policy makes it transparent what the hierarchy of Strategic and Local Development plans are expected to include. However, the policy states that development plan targets will be based on regional estimates and it is unclear how those targets will be determined if an area is not within a Strategic Development Plan area.
- The figure in the MSWW regional section of 44% of additional homes to be affordable homes, could be mis-interpreted as a site level target. It should be clarified that, as detailed in Policy 5, LDPs will set locally relevant targets for development sites (influenced by both local need and viability).
- Agree in principle with the need to identify sites for affordable housing-led developments at a local level.
- Of concern to the Council, in the absence of publicly owned land, it will be difficult to incentivise private landowners or secure the best sites for these schemes, as viability concerns and the market may preclude delivery. It is not clear how the policy may support private sectors.
- The NDF definition of housing need used in the estimate of housing needs is not based on the planning (TAN2) definition. The reason for changing the definitions used is unclear and may have implications for monitoring.
- We understand the figures for the (overall) need for additional homes included in the NDF to be a Welsh Government housing figure not a planning figure. As this is not intended to be a planning target this should be made clear in the document or it may be better, to avoid confusion, if the document did not include numbers at all.

- PPW emphasises the need for Planning Authorities to plan for a mix of housing, including for older people and people with disabilities. NDF fails to address the challenges of specialist housing types, but the Council considers this issue is of such national importance that it needs policy support from the NDF.

#### 4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input 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?

- LDPs are required to provide a spatial expression to any policy with a spatial link. The NDF should not be treated differently in this respect. Therefore, as these zones are yet to be identified, it is considered that this policy advice would be better expressed through PPW.
- There is disconnect with the linkages to the Outcomes - How does this policy on mobile phone communications relate to Outcome 8 on broadband?

## 5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?

- Policy 7 – this is an action point not a Policy. PPW and the sustainable transport hierarchy already covers low emission vehicles so PPW/relevant TANs could be used to further encourage them and to ensure that lower tier development plans address the issue.
- The policy title “Ultra Low Emission vehicles” must be clarified – as worded it implies it is limited to electric vehicles. The Policy should not be restrictive and should not just emphasise charging infrastructure for electric vehicles, which may be inappropriate in rural areas. The policy should be more enabling and provide the policy framework for other forms of low emissions technology, such as hydrogen fuel infrastructure.



## 6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- The Council agrees in principle with the approach; however, it is noted that there is a change in approach in particular towards seeking enhancements.
- It may be difficult to gauge what is reasonable in terms of enhancement (impact on viability/practicalities of delivering) and so question whether the NDF can provide the necessary policy framework and guidance. This goes beyond mitigation and may be interpreted differently by Planning Inspectors.
- Can it be confirmed that evidence will be provided through Welsh Government and its key partners to enable planning authorities to "...include these sites in development plans"? At present, it is unclear if this evidence will be provided within the Green Infrastructure Assessments and/or Area Statements.
- The Council is unclear how the first bulleted criteria in Policy 8 will be applied as there is no spatial expression. For example, it may result in land-use conflict with renewable energy priority areas.
- It is not clear what is meant by "....cumulative action...."
- Policy 9 seems to be an aspirational action point/statement rather than a strategic land use policy. Without the land identified it is not clear how the national forest will be delivered and safeguarded.
- It would seem appropriate that once areas have been identified for or established as National Forest, they are then mapped as nationally important Strategic Green Infrastructure in order to protect their multi-functional role? It is accepted that recognition must be given to both the ecological value and the productive/commercial role of any such forest.

## 7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree 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 Council welcomes the opportunity to review TAN 8. However, Powys County Council is concerned over the way that the Priority Areas have been identified.
- There are serious concerns as to whether the NDF could deliver the large-scale wind and solar energy developments anticipated by Welsh Government in the identified priority areas, which raises major doubts about the robustness of the underpinning evidence base. The Council has noted that some of the priority areas contain constraints such as internationally designated Special Areas of Conservation (SACs) which the evidence base states were excluded.
- ARUPs have not refined the priority areas sufficiently to be meaningful – e.g. failing to take account of renewable energy industry guidance regarding proximity of large scale wind and solar developments to settlements and residential properties to account for noise etc. As a consequence, Priority Area 6 is simply too large and improperly constrained to be meaningful. The Council considers much greater clarification and further assessment of the priority areas is necessary to ensure appropriate policies can be developed.
- Deliverability of any large-scale renewable energy development in some priority areas is questioned. Lack of consideration of other nationally important strategic land-uses such as dedicated military training areas (e.g. Sennybridge Training Area which takes up much of priority area 8) undermines the evidence base as it implies these and other nationally-important strategic land uses have been ignored and that the evidence is not therefore appropriate.
- The Council questions how solar and wind developments have shared priority areas



particularly in mid-Wales, when these technologies, according to the evidence base, have different constraining factors. If the evidence base were robust, the Council would expect the maps to more widely identify areas of wind only, solar only as well as wind and solar priority areas.

- Priority Area 8 should be removed as it predominantly within Sennybridge training area and its approach flight paths. The Army makes a significant economic contribution to the area, and as SENTA and its low flying approaches takes up much of Priority Area 8 renewable energy development would not be appropriate in this area as it would compromise military requirements and potential loss of the facility. Have landowners such as the MOD been consulted appropriately?
- No recognition in policy of community ownership of renewable energy schemes to ensure that the aspiration of 1GW in local ownership is delivered.
- Policy 16 refers to the spatial areas for renewable energy as being a matter for Strategic Development Plans, i.e. regional planning, yet priority areas are being identified by the NDF. Does this mean that strategic development plans should refine, remove or add to the Priority Areas further? It is unclear how areas without SDPs can meet the policy requirements.
- The policy should be reworded to acknowledge there may be no SDP for an area (e.g. it may be a joint LDP area). This would enable flexibility in the plan hierarchy.
- Traffic light Red – these should be shown spatially as these are the areas protected/safeguarded from large scale wind and solar renewable energy projects. Helps to assess where Green priority areas may sit directly alongside Red areas (a potential source of conflict). The maps need to be presented in terms of red/amber/green for each technology – it will also be necessary to indicate areas where there is no potential due to lack of resource.
- Maps presented at 1:250,000 scale due to high level study at a national level and not designed to present site-level accuracy. However more detailed maps will be required to refer to at the planning application stage in order to identify whether a site lies within or outside of the Priority Area, which will be fundamental to decision-making. How will decision makers and potential developers know whether a development proposal is inside or outside a priority area?
- National policies proposed in the NDF are in conflict with and contradict the policies set out at the local level in the Powys LDP, so divorcing DNS from the Local Development Plan policy framework. The NDF and its evidence should have regard to the Powys LDP's evidence base and the criteria used - as defined by WG's Renewable Energy Assessment Toolkit - to assess the potential for renewable energy. The policy should reference lower tier plans.
- How will decision makers be able to reconcile new national policy with the existing adopted local plan policy where the detailed evidence base indicated that wind power would be unacceptable due to constraining factors?
- No recognition of the Landscape Sensitivity. It is apparent that no Landscape Sensitivity Assessment has been prepared to underpin the priority areas, as undertaken to inform Powys Renewable Energy policy. Thus there is a high potential to undermine other NDF policies such as safeguarded ecological areas (NDF Policy 8) and adversely affect other economic sectors such as tourism. It is also of concern that no account seems to have been taken with regards to the settings of protected

landscapes.

- There is a conflict between some of the Priority Areas and the Local Search Areas for solar identified within the Powys LDP where solar energy development is to be prioritised.
- Concerns about the robustness of the underpinning evidence base. For example, Stage 2 table relating to the rationale for refined priority areas makes reference to Priority Area 5 as: “The boundary of this area has been pulled back to avoid Llandrindod Wells”. This is incorrect as Priority Area 5 is not in the same area as Llandrindod Wells. Llandrindod Wells is to the south of Priority Area 6.
- The Council welcomes recognition of cumulative impacts within policies 10 and 11 – further guidance on assessing and addressing cumulative impacts so that communities and protected landscapes do not become “surrounded” by RE developments should be issued and consulted upon well in advance of the NDF start date.
- The development of large-scale wind development outside the Priority Areas, particularly in close proximity to their boundaries, could potentially prejudice the development of large-scale wind within the Priority Areas, due to cumulative impacts. Buffers around the Priority Areas would help to minimise potential for cumulative effects.
- The GIS computer generated priority areas which take into account a number of variables in locating suitable renewable development, do not look at industry or other important economic sectors which could be impacted by the development of wind or solar farms, e.g. tourism businesses and tourism assets such as National Trails / rights of way which play an important role in the rural economy. This needs to be given consideration to and factored into planning guidance for decision makers.
- Priority areas have not taken into account any other known unsuitable areas i.e. large areas of peat which should be safeguarded as important carbon sinks.
- A policy should be included to ensure proposals for grid improvements and connection are considered with the application for the renewable energy scheme itself. Any additional Infrastructure associated with DNS renewable energy developments should also be dealt with by appropriate NDF policy.
- There is a lack of consideration in the NDF for Grid Connection and ancillary infrastructure and how that will impact the landscape and other economic sectors. Planning policy guidance for decision makers should regard the landscape impact of grid connection as a material consideration. Applications which allow development to connect to existing DNO grid connections (and therefore would be more sympathetic to the landscape) should be given more favourable weight than applications which will require large scale pylons.
- Grid capacity has not been considered in refining the Priority Areas, however this matter will impact on the deliverability of renewable energy development in these areas.
- The impact of all RE developments and all associated infrastructure on the **landscape and communities** should be considered through the NDF as this seriously affects delivery and impacts local communities. When a DNS application is

submitted it must allow for community engagement / consultation, there must be a clear process and communities must be given ample notice of the application to assess wider implications and impact on the community. The Council also consider that community consultation should not be limited to the community / ward most directly impacted. Consultation and engagement should extend to all those surrounding communities that also may be impacted by congestion during the construction phase of any developments and also the visual impact due to the largescale nature of the developments. For example, It is unclear how issues such as vehicular access to the Priority Areas will be addressed, as this may affect the delivery of renewable energy within the areas through unacceptable impact on wider road networks and communities. A statement should be included which refers to LDP policies.

- Wording of the policies should be clear and consistent to establish the meaning of “identified protected assets” (they may be protected at different levels in the planning hierarchy or be statutory/non-statutory designations).
- The policies should have “strategic green infrastructure” added (when identified) to list of safeguarded features, to be in alignment with NDF policies 8 and 9.
- Policy 13 for determining other RE DNS proposals refers to the criteria in Policy 11. However, the criteria for Policy 11 have been written solely with wind and solar energy in mind. Other types of renewable energy which may be Developments of National Significance (e.g. energy from waste schemes) are not covered sufficiently by the policy and may have different impacts that need to be addressed (e.g. amenity, air pollution, transport implications). The Council would want to ensure linkages to LDP policies which provide a more robust and comprehensive decision-making framework. The list of criteria in the NDF is inadequate.
- The Council notes that the regional maps do not include reference to the priority areas for renewables – they will impact at regional scale.
- Policy 14: District Heat Networks: It is not clear how the Priority Areas and identified settlements have been arrived at. No alignment has been made with national and regional growth areas where robust policy drivers could enable large, viable schemes to be brought forward. Potentially the advice on large scale, mixed use developments would be better placed in PPW/TAN advice.

## 8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- The Council disagrees with the principle of three regions. It considers that there should be a fourth region aligned with the Growing Mid Wales Growth Deal.
- It is noted that the NDF acknowledges that the large M&SWW Region is considerably varied in character and that two broad spatial sub-regions should be recognised – described in the NDF as a) the built up areas around Swansea, Neath Port Talbot, southern Carmarthenshire and the Haven Towns and b) the wider rural hinterland of north Pembrokeshire, Ceredigion, Powys and northern Carmarthenshire. The Council disagrees with this definition and considers that a separate Mid Wales Region would be more appropriate.
- Whilst the Council recognises the principle of enabling SDPs at the regional level, the Council does not agree that requiring the full coverage of them is necessary. The Draft NDF is written as if Strategic Development Plans are a given for “each region” of Wales – inferring that they will cover the whole region and that every LPA will be expected to have an SDP framework structuring its LDP. This is not in accordance with the supporting text for the Mid and South west Wales region which indicates flexibility of approach.
- The Council consider that the decision on whether to pursue a SDP should be dependent on the nature and scale of the issues that are being faced by a region/sub-region/constituent LPAs, how much interrelationship there is/how much scope there is to address the identified issues through regional working and the cost implications.
- The complexities of different time frames (differing Plan lengths across the three tiers of development plan, with current adopted LDPs at varying stages) and the impact this has on evidence gathering should be recognised.
- Some LPA areas/sub-regions may not need more than LDP or Joint LDP coverage to control growth and development – depends on the issues that a Plan has to address.



- There is a practical difficulty in terms of differing end dates of current Local Development Plans and how soon an SDP/LDP Lite framework could realistically be put in place. There will be a drive towards continuing with replacement Local Development Plans because of the complexity of changing the system whilst LPAs cope with resourcing issues. The threat of an LDP drop dead date, creating a policy vacuum, can mean LPAs are left with little choice but to pursue review/replacement of traditional LDPs (i.e. not await LDP Lites) to ensure continued development plan coverage.
- The flexibility offered towards regional planning on p.56 (A collaborative and holistic approach) is welcome. However, this text appears to conflict with other parts of the NDF document, including Policy 16, which seem to refer to the Strategic Development Plans as having full coverage. The Council considers it essential that the NDF offers choice as to whether to progress/join an SDP.
- It is accepted that in the absence of an SDP, the LDP (potentially a Joint LDP?) would need to ensure Policy 16 requirements are adequately addressed.
- The Council question how realistic the delivery of implied full SDP coverage would be , given the differing Plan timetables (and hence different priorities) for constituent LPAs, together with anticipated costs and staff resources where SDP preparation may have to progress alongside a replacement LDP.

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales

## 9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



## 10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- There should be four regions and there should not be a requirement for Strategic Development Plans across the entire region or constituent sub-regions. Challenges faced in a rural area may not suit this approach. The Council considers that a policy proposal for full SDPs coverage is not realistic, appropriate or achievable within funding constraints.
- Advice on regional planning is not clear or consistent across the document. The two centres of regional growth identified for Powys (M&SWW area) are not supported by Powys County Council to the exclusion of other areas and the basis for identifying Newtown and Llandrindod Wells as regional centres is unclear (what of important centres such as Welshpool and the rest of Powys' Market Towns?) and has no robust justification - what factors were used to identify these as regional centres in Powys?
- There is no consistency of approach – multiple towns are recognised as regional centres in Pembrokeshire - the “Haven towns” – but a similar approach is not used elsewhere e.g. “Severn Valley market towns”.
- Policy 24 implies the need for SDPs for the regional centres (such as Llandrindod and Newtown). The Council cannot support this approach.
- Other main settlements have similar existing roles. The NDF should have had more regard to the stringency applied to SDP preparation set out in the Draft LDP Manual:
 

“All settlements across a region are not equal in terms of their role and function. Not every LPA within a region should have a settlement, or settlements, identified within the SDP. An SDP should only identify those places key to delivering the plan, not formulate a list of locations with at least one in each constituent LPA as a default position. There should be a clear evidence base for identifying places linked directly to their role and function, both within and beyond the region”.
- To ensure deliverability, settlement capacity studies are required to provide evidence otherwise the identified growth settlements cannot be relied upon.



- There is potential for conflicting demands in terms of the resources of the region, particularly with regard to landscape and renewable energy, and also the diversity of the region, particularly tourism and the rural economy. How are the assets that contribute to visitor appeal to be protected? The size of the Renewable Energy Priority Areas, particularly in Mid Wales, means that significant landscape change will be accepted on a large scale, which could adversely impact on the attractiveness of the area.

## 11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input 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 Council objects to the identification of only three regions. Given the importance of the emerging Growth Deal for Mid Wales and strategic importance the Council attaches to it, the Council considers that Mid Wales should be identified as a Region in its own right.
- The Council does however welcome the flexibility of approach that enables definition of and focus on sub-regions, rather than a full region, where it is demonstrated this is appropriate, as this provides opportunities for other regional groupings.
- The suite of regional policies is not consistent or well aligned. For example, MSWW has a specific policy on Regional Centres but the equivalent policies are called something else in the other two regions. This leads to a confusing document.
- Retain scope for LPAs to work jointly or individually to produce Joint or Single LDPs that cover the area issues, without bringing in the complexity of a Strategic Development Plan. If moving definitively towards SDP and LDP Lites across all of Wales, realistic timeframes for such work should be identified so that LPAs are working to a common goal across each NDF Region/NDF Potential Sub-Region and are not left without adopted lower tier plans.
- The perceived regional linkages on the national and regional maps do not reflect the reality of important economic linkages. For example, the eastwards mid-Wales links are into the rural Welsh Marches rather than demonstrating robust links to the motorway network at Shrewsbury and centres such as Hereford. This gives a false impression of rurality. Furthermore, the arrows give the impression of domination by the road network, and opportunities for improvements for public transport are neglected e.g. continued rail improvements or station improvement / reopening opportunities.
- Information provided on the national map are omitted from the regional maps, most noticeably protected landscape (National Parks and AONBs). The regional maps should include not only the information on the national map but provide additional regional context. Additional detail is necessary to accurately reflect the extent of regional growth centres, which may be best represented by inset maps.
- The NDF is silent on important regional issues such as waste management (e.g. void space), minerals and national transport infrastructure. The Council consider that an opportunity has been missed to provide that national policy framework to sustainably manage such resources.

## **12. 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.

## **13. 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?

## 14. 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 NDF refers in its outcomes to the need to manage development in areas where Welsh is the everyday language of the community and emphasises the role of education in other areas. However, the NDF does not include a spatial policy to implement this. If the intention is for these areas to be identified and policies formulated in lower tier plans, this should be made clear.
- The Welsh Language is referred to in respect of each of the regions, however this only highlights that development plans should consider the relationship between strategic housing, transport and economic growth and the Welsh language. It is understood from the figures provided that the Welsh Language is relatively important across all of the regions, but more so in North Wales and in heartlands elsewhere. The approach towards the Welsh language in the NDF should provide policies to support the outcomes.

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.

## 15. 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?

Powys County Council welcomes the publication of the draft NDF and the opportunity to contribute to its improvement. However, given the time taken for its preparation and the contributions the Authority has made during the calls for evidence, the outcome is disappointing as it is not clear what the NDF document is seeking to address. Furthermore, there seems to be little attempt to have policies coherently underpinned by robust evidence such as housing viability or aligned with active existing regional agenda such as Growth Deals, which raises concerns that the NDF can be effectively delivered.

- The Draft NDF document appears to be trying to include aspirations, include wider WG policy than planning as well as act as the highest tier of development plan for policy purposes and decision making. It therefore loses its spatial planning focus and is not likely to set the well-evidenced, robust and reliable higher tier framework for spatial planning that it sets out to do. It is doubtful if nationally significant development proposals could be determined against any of the policies proposed in the NDF. A clear distinction should be drawn between aspirations/aims etc. and spatial planning policies which could be a separate land use planning section.
- There is an inconsistent audit trail between the background evidence and the decisions made in the Plan.
- There is a mix of terminology across the Plan (e.g. growth centres, urban centres, urban clusters, cities, towns, large towns, rural towns, villages/rural communities) and different sections address approaches to the national settlement hierarchy in various ways which leads to a confusing document. Map legends do not always correlate to written text. The lack of consistency extends to the regional names (Map – Mid and West Wales; Text - Mid and South West Wales. This is disappointing to see in an important national document.
- As a higher tier plan, it is often weak/inconsistent in setting out, particularly in the Policies section, how exactly lower tier plans should respond and relate to the NDF. For example, the lack of clarity of the relationship with sustainable settlement hierarchies in lower tier plans. This will fail to add certainty or reduce complexity of the planning system in Wales.
- The NDF should be more specific about the role, relationship with, and coverage of the full suite of development plans, and as such properly make reference to which tier and type of plan is being referred to, i.e. SDPs, LDPs, LDP Lites as appropriate.
- The Council is concerned about the implicit need for SDP coverage across the regions or sub-regionally due to the costs involved.
- Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole (the three tier framework).



Whilst this is well explained in the introduction (Chapter 1) as is the fit with PPW and Technical Advice Notes, later chapters (including Renewable Energy and the regional sections) fail to recognise the synergy of the three tier system and also how the NDF relates to the existing national policy framework in PPW/TANs. Further cross-references with PPW and TANs would be welcome to firmly establish the policy framework.

- To increase understanding of how the NDF intends to influence lower tier plans, it would be better if the Welsh Government could identify the national issues in this document that lower tier plans are best placed to address, especially where evidence is still awaited. Sometimes the NDF is trying to do too much in one document and failing to make appropriate links to the complementary coverage that PPW and TANs already include on national issues. In other places (e.g. Policy 5 and Policy 8) the approach is far clearer.
- Decision makers need to know when the NDF carries weight. Will it be only on final publication or in emerging stages?

## 16. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

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