

# 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?

*No Response*

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

*No Response*

## 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...

*No Response*

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 Response*

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 Response*

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 Response*

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?

*No Response*

## 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...

*No Response*

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 Response*

## 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?

*No Response*

## 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?

*No Response*

## 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?

*No Response*

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.

*No Response*

## 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?**

Whilst this is the first attempt at a NDF and we are supportive of the principal it is fair to say that there has been a mixed reaction to the document. The key areas of concern are:

- Further context and evidence are needed on certain topics to enable better infrastructure decisions and long-term investment. The involvement of wider sectors and stakeholders could also help form a stronger evidence base. This lack of evidence means that much of the plan seems simplistic and are not overtly based on evidence as LDP's are.
- The thinking for three regions rather than four is problematic and does not reflect reality and local diversity/needs.
- There needs to be recognition of the greatly reduced resources within planning that make delivery of SDP's and LDP's difficult within current time frames. The 'drop dead' date for LDP's should be revisited as this makes SDP delivery impossible in many areas. The relationship between different tiers of planning and other decision making processes need to be made more explicit.
- The outcomes are mostly laudable aims but there is a real issue on deliverability, particularly when they are in part contradictory. For example, Outcomes 2, 3, 5, 6, and 8 would support growth whilst Outcomes 9, 10 and 11 seek to protect and enhance natural resources and the environment. A conflicting set of objectives cannot deliver sustainable development. However, it would be left for Local Planning Authorities to try and reconcile this through their LDP's which would be difficult.
- There needs to be greater ambition for 'rural' areas with a recognition that there are real differences between mid and west Wales. There also needs to be a greater understanding of the impact on language issues and how the plan will help deliver the ambition of additional Welsh speakers. The framework runs the danger that it is seen as just for urban areas (and the emphasis on brownfield sites there is also problematic).
- The draft needs to be more ambitious and think longer term in how it addresses climate change and push for behaviour change across the industry. Within the NDF the issue of decarbonisation is too narrow and the issues of flood risk and coastal erosion are not fully tackled.
- Does the NDF look forward enough even for the next 20 years, as the map on page 25 indicates that the focus is on what primarily exists and there are no concrete proposals on improving transport links via North and South Wales. There is also concern that certain issues may not be tackled with the small-scale interventions proposed, for example with M4 congestion, or even reflect current discussions that LA's are having on transport with WG.
- There is a lack of detail on certain topics. The outcomes have no clear detail on actions and directions. And on certain topics (e.g. Mobile Action Zones, biodiversity enhancement, national forests etc.) it only stipulates that areas and sites are to be identified, but does not clarify the how and when. And on topics where there is a lot of detail, it only highlights the inconsistencies in other places.
- Clearer links need to be made with DNS, WIC and the Wales Infrastructure Investment Plan, as currently there is no mention of DNS and WIC in the draft. Links also need to be clearly made between PPW, SDPs LDPS and the LDP Manuel. A table setting out the links and relationships between the relevant plans would provide clarity. Links also need to be made with how wider UK policy affects Wales, as planning issues just across the border can have a long-term impact on Wales.
- There is a lack of recognition of the substantial work that has occurred on a regional basis such as the North Wales Ambition Board and other regional arrangements. This runs the risk of a serious dislocation between on the ground reality and the Framework. Critically it may prevent some of those plans being able to progress if they are not supported by the NDF.
- The relationship with the Corporate Joint Committees envisaged in the Local Government Bill needs clarification as does the relationship with the National Parks Authorities and their strategic planning role.
- The housing figures within the plan are based on new methods that are subject to debate. The danger of putting housing 'need' figures on the face of the NDF are that they become 'targets' that LDP's will be tested against. Given that the figures are widely considered low and suggest unviable levels of social housing this is problematic.

## 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	craig mitchell
Organisation (if applicable)	WLGA
Preferred contact details (email/phone/post)	email

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