


From: [Angela Feltham](#)
To: [NDE](#)
Subject: Completed Consultation Document.
Date: 31 October 2019 04:48:28
Attachments: [NDF-response-form_0 \(1\).doc](#)

Good Morning ,
Please find the attached.
An acknowledgement of receipt would be appreciated
Angela Feltham
Clerk to Kerry Community Council.



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Consultation Response Form

Your name	Angela Feltham
Your address	
Preferred contact details (email/phone/post)	clerkkcc@gmail.com
<u>Organisation (if applicable)</u>	Kerry Community 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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:

There has been a lot of hard work put into the wording of this report and the formation of questions restricting a comprehensive response. It is the general consensus of this Council that the use of a lot of nice words serves only to achieve an "Enid Blyton" effect with no supporting evidence on how the NDF proposes to achieve their fine objectives, which, of course we all aspire to.

Outcome 3 - The three-party model is not acceptable.

Powys has no commonality with Swansea and Llanelli; therefore effectively limiting the ability for Powys to state matters pertinent to their own development.

Is there a valid reason for the rejection of the four regions as proposed in the report provided by Cardiff University (Identification of Regional Areas for the National Development Framework) dated June 2017?

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>
<i>Urban areas (Policies 1, 2 & 3)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Rural areas (Policy 4)</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 have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

We largely agree with the proposals but question whether these aims are achievable.

There is no substance to these nice words detailing how NDF hope to achieve this objective.

The omission of a strategic plan for developing transport or health infrastructure or the Further / Higher Education sector to best serve **all** the communities of Wales. Powys, as a mainly rural area will once again suffer further erosion of the ability to have a say in meeting the real needs of the local communities.

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 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?

We acknowledge the need for affordable housing but this must be where there is a **proven need** for such properties and they must remain 'affordable' in perpetuity.

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 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 improve mobile phone coverage in the areas which currently have limited access?

This draft fails to supply a map detailing these action zones which effectively makes it impossible to give a comprehensive response.

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 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 enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

We concur with the proposals for low emission vehicles and suggest that all newly built homes must have electrical charging points. However, there is still much work to be done for such vehicles to be a viable option and it is not considered achievable by 2040.

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"/>

This policy largely conflicts with Outcome 5. Land is a finite resource. If it is to be used to accommodate more homes, jobs and investment ie factories, office blocks, shopping centres etc. where within urban areas will these much needed green spaces be situated?

Alongside the proposal to increase tree cover by 2,000 hectare annually this appears to be unrealistic.

Perhaps the inclusion of the NRW maps referred to on page 34 in the NDF 2020-2040 Consultation Draft document would have been of benefit in supporting this commendable proposal.

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 transport of energy is of equal concern, presenting a negative effect on the health and economy of a greater area.

To invest in underground transmission is we understand financially restrictive, nevertheless Council feel in sensitive areas i.e. areas of natural beauty and in the interest of tourism, this is of sufficient importance to the economy and detriment of the local area to warrant investment.

The perceived additional financial costs will be considerably reduced when viewed against the probable loss of income due to the industrialisation of tourists areas.

The continual erosion of public consultation for local people is deemed unacceptable and seriously undemocratic.

There is no policy for directly compensating those individuals and communities impacted by these proposals.

This is of major concern to local residents who feel powerless regarding the incessant erosion of their surrounding countryside and in some cases, actual loss of livelihood.

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

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.

The three-party model is not acceptable. Powys has no commonality with Swansea and Llanelli. There should be four regions as proposed in the report provided by Cardiff University (Identification of Regional Areas for the National Development Framework) dated June 2017. Powys should be a region in its own right designated as Central East Wales.
Once again this outcome was obtained without public consultation.

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

The South West and Mid Wales proposal is simply too large and diverse and demonstrates none of the required parameters of infrastructure links; travel to work lines or shared characteristics. Looking at the current economic indicators there is no correlation between the Swansea, Llanelli, Neath, Port Talbot areas and rural Mid Wales or our towns. There are even considerable differences between Pembrokeshire and Carmarthenshire and most of Powys. Powys has: statistically full employment, large numbers of self-employed, the best business start-up retention rate and highest skills levels in Wales, a strong and highly entrepreneurial SME sector and an economy where the greatest share of GDP comes from tourism, agriculture and forestry. This proposal leaves Powys largely unrepresented, the strategic plan for growing and sustaining Powys prosperity and wellbeing must be area specific.

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

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?

The continuous development of on shore wind turbine farms will add an additional threat to all forms of wild life and is in direct opposition to the HRA policy formed by the NDF.

The development of off shore wind turbines is perceived to be less intrusive and in the long term a more efficient alternative.

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?

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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.

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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?

We reiterate

The three-party model is not acceptable. Powys has no commonality with Swansea and Llanelli. There should be four regions as proposed in the report provided by Cardiff University (Identification of Regional Areas for the National Development Framework) dated June 2017. Powys should be a region in it's own right designated as Central East Wales.

Once again this outcome was obtained without public consultation.

The continuous underinvestment in Mid Wales, defined as Powys, is unaddressed in this draft and as such is a disappointment.

Once again a valuable opportunity is overlooked to invest and develop this major resource which, although sparsely populated, continues to play an integral part in the unique way of life in Wales.

Transport, education and health must take priority and the level of populace should not be seen as a valid reason for allowing the continued lack of investment.

16. 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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Kerry Community Council
Serving the villages of Kerry, Sarn and Dolfor.
Minutes of the Extraordinary Meeting of Wednesday 16th October 2019
in Kerry Village Hall

	Chair	Cllr. M.S.G. Morgan (Kerry)
	Cllrs.	Cllr. V. Wildish (Kerry) Cllr. S. Holloway (Kerry) Cllr. N. Hayward (Kerry) Cllr. C. Seal. (Kerry). Cllr. P.A.M. Dyer (Sarn) Cllr B. Pryce (Sarn) Cllr. I. Jones (Dolfor) Cllr. T. M. Powell (Dolfor).
	County Cllr.	County Cllr. Mrs K. Roberts-Jones
	Clerk.	Mrs A. Feltham.
	Members of the Public.	2

Item. 1. Apologies.

Cllr .L. Powell (Kerry) Cllr. D. Jones (Sarn) Vice-chair.

Item 2. Response to the National Development Framework Draft Consultation Document (attached).

Jill Kibble was invited to address Council and was able to give Council additional updated information. Council was supported by documentation provided by the Vale of Montgomery Cluster Group.

Item 3. Any Other Urgent Business

Council voted all in favour to the purchase of a screen and projector enabling related documents to be viewed throughout Council meetings. This was considered to be particularly beneficial during Planning Consultations making a vast saving on printing expenses.
Cllr. N. Hayward to purchase.

There being no other business the meeting closed at 9.15pm.

Next Scheduled Meeting.

Wednesday 31st October 2019 at 7-30pm in Kerry Village Hall.

Meetings are open to residents, who may only address the meeting with the Chairman's prior consent.

If you wish to address the Council in Welsh please make your intentions known at the time of your request, which should be made prior to the meeting date.

Copies of Minutes can be made available after approval on request or by visiting our web-site
kerrycommunitycouncil.gov.uk

* Although KCC works in conjunction with PCC as consultants, it has no authority to grant planning permission.

Clerk: Mrs. Angela Feltham,

email. clerkkcc@gmail.com

www.kerrycommunitycouncil.gov.uk