

From: [John Osmond](#)
To: [NDE](#)
Subject: Plaid response to NDF
Date: 19 November 2019 15:28:29
Attachments: [Plaid Cymru response to the NDF Consultation document.pdf](#)

Hullo

Please find attached Plaid Cymru's response to the NDF consultation. I appreciate this is a few days late, but trust it can be taken into account nonetheless

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Consultation Response Form

Your name	
Your address	
Preferred contact details (email/phone/post)	
Organisation (if applicable)	PLAID CYMRU

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

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

With the exception of Outcome 4 (1 million Welsh Speakers by 2050) the Outcomes are not 'SMART' i.e. Measurable; Even 4 does not give a target for the NDF end date of 2040. The Outcomes are so vague that measuring progress of the NDF will be impossible. Outcomes 5, 9 and 10 are mere assertions of the current situation. More specific targets need to be attached to each income, referenced to a more analytical introduction than the largely descriptive 'Overview' section.

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 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 urban policies are sound in a British context but do not address the special needs of Wales, where the topography mitigates against 'compact cities' in much of the country. In some areas linier development may be more appropriate as long as it is focussed on public transport corridors. The stress on Transport Oriented Development is strongly supported.

The rural policy is weak and does not address the special needs of rural Wales. SDPs should be required to identify 'domains' or 'clusters' of rural towns and villages that together could provide a critical mass capable of supporting viable facilities and services. In the supporting text 'improved provision of broadband' is critical and deserves more than one sentence in this policy.

We understand that the Spatial Strategy diagram must be largely diagrammatic but it appears to be descriptive rather than a guide to strategy. For example it shows 'regional connectivity'

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

This policy is a vast improvement on the Wales Spatial Plan in that indicates a new approach and contains actual numbers (so why not have 114,000 additional homes by 2040 as an outcome?).

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

Again - a good policy showing a new approach that could have been cross-referenced in the 'rural communities' policy 4. It is not clear how the MAZs will be identified and referenced though; will there be a specific Technical Advice Note or will they be identified piecemeal? Will they have specific boundaries, like the energy action zones or be identified symbolically on an all-Wales plan?

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?

A policy that we strongly agree with in principle but as this is a *spatial* plan deficiencies in, e.g. the electric vehicle charging infrastructure could have been identified in broad terms on the strategic or regional diagrams or delegated to Strategic Development Plans. This is another initiative that could have been cross-referenced in the 'rural communities' policy 4.

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

Policy 8 is a sound policy that is clear at what point in the system (LDPs) such networks will be identified and safeguarded.

By contrast the National Forest policy 9 is vague and gives no indication of where the National Forest will be located - one huge area, several large areas or dispersed throughout Wales? The target of increasing woodland cover by 2,000 hectares per annum is another target that could have been included as a specific 'outcome'.

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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?

While we strongly support the aims of the alternative energy strategy we question whether the reliance on *large scale* wind and solar developments is appropriate all over Wales, where the topography and settlement pattern in many areas point toward smaller scale community oriented provision. We also question whether it is appropriate to identify Energy Priority Areas in precise detail on the map on page 42. Identifying the principle areas by symbols on the strategic diagram (as is done on this map with the district heat networks) would be more appropriate for the NDF with the actual area boundaries being identified in SDP or LDP maps, taking local factors into consideration.

The District Heating policy is strongly supported.

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

Wales has suffered from the lack of Strategic Planning at a regional level since County Structure Plans ceased to be produced 20 years ago. Swansea Bay and Wrexham-Deeside perhaps deserve their own SDPs however and the NDF itself seems to acknowledge this.

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

Development should be concentrated on public Transport **Development Corridors** including but not confined to, the named large towns.

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"/>

Development should be concentrated on public Transport **Development Corridors** including but not confined to, the named large towns. For example the Heart of Wales Line should be a development corridor

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 checked="" 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.

Development should be concentrated on public Transport **Development Corridors** including but not confined to, the large towns and cities identified in the regional sections.. There should be 5 regions not 3. Just having one tick box for up to 7 different policies is not likely to elicit a balanced response. There should be at least one specific transport policy supporting the metro proposals and TOD.

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?

Support for areas where Welsh is widely spoken is crucial to maintaining Welsh as a living language. As most of these areas are rural, a policy requiring SDPs to identify rural domains or clusters of small towns and villages where a basic level of facilities and job opportunities will be supported is essential to prevent selective depopulation and economic decline, and thus decline of the Welsh language as well.

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?

Policies 17 to 33 are accompanied by three regional strategic diagrams. These each need to have a reference number so they can be referred to in SDPs and other relevant policy documents. Their status and relationship with the overall Wales Strategic Diagram needs to be clarified. The elements referred to in general policies 5,6,7,9,10 and 14 could be indicated symbolically on these plans.

As with the overall diagram, the elements shown should not be merely descriptive but indicate *policy*, such as where regional and indeed international connectivity is to be improved. THE LACK OF ANY SPECIFIC TRANSPORT POLICY AND STRATEGY IS A MASSIVE OMISSION FROM THIS DOCUMENT. Where do the various metro proposals fit in? The overall development strategy for Wales must be in large part be based on transport strategy. Development **corridors** along public transport routes are more appropriate in Wales than a simplistic settlement hierarchy.

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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