

# 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?

Agree

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

Agree with most of them

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

Comments: Calon Cymru Network believes there is too much focus on cities and the largest towns, on the assumption that employment patterns are unlikely to change. We suggest that employment is likely to change, to become more dispersed, and more based on local renewable resources. We argue that the Welsh economy will become less dependent on large-scale inward investment by transnational organisations. We also suggest that 'sustainable growth' is an oxymoron because planetary resources are finite. Instead, we need more equitable distribution of resources, and of rewards from the use of resources, in the Welsh economy.

## 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...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)				X			
Rural areas (Policy 4)				X			

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

Comments: The focus on current main population centres ignores the likely repercussions of rapid climate change and resource constraints, requiring greater local resilience, with more population nodes capable of providing all aspects of the foundational economy. The spatial strategy is a step in the right direction, a green gloss on the status quo, but does not enable the more radical restructuring required.

The strategy does not mention the reinstatement of the Carmarthen to Aberystwyth railway. We suggest that this reinstatement is essential to improved connectivity in West Wales.

## 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?

Agree

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

Comments: Action needs to be taken to make compulsory purchase cheaper. Value uplift when land is acquired for development should be shared between the vendor and the purchasing public body, or land costs will continue to militate against the delivery of affordable homes. Community land trusts are not mentioned specifically, and we think this is an omission. Land trusts can provide homes that are affordable over their whole lifespan.

#### 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?

Disagree

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

Comments: The whole of Wales should be an 'action zone' for both mobile and broadband coverage. Contract negotiations should be tighter in future. In the last phase of broadband rollout initiated by the Welsh Government, there are many uncompleted projects that are not included in the new phase, indicating poor negotiation and wasted public money. Calon Cymru would like to see the introduction of a universal service obligation for mobile and broadband coverage, as there is for fixed-line telephones. In the meantime, the UK Government's new agreement, for mobile operators to collaborate to expand network coverage, is a useful step.

#### 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?

Neither agree nor disagree

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?

Comments: The strategy says "we expect business and industry to drive much of the rollout of charging infrastructure". Calon Cymru wonders how robust this assumption may be. The commercial sector could respond in areas of greatest demand, but would be unlikely to fund a charging network across rural Wales. Calon Cymru considers that electric vehicles should be regarded as part of a low-impact transport future, which also requires homes, jobs and services to be closely co-located.

#### 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?

Agree

## 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...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and solar developments		X					
District heat networks	X						

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?

Comments: Calon Cymru is not in favour of concentrating large-scale wind and solar developments in remote areas that are neither National Parks nor AOBs. We suggest that renewable energy infrastructure should have three strands:

1. Offshore/marine (including tidal), mainly for Wales' coastal settlements and for export
2. Onshore large schemes for export, which should be in those locations where power can be generated most efficiently (with the greatest return on energy invested), regardless of the landscape status.
3. Onshore small and domestic schemes (including hydro) for local consumption. We agree with the ambitions for local ownership.

We believe the Welsh Government should in time acquire power to mandate new grid connections. We agree that district heat networks should be considered for all developments of 100+ homes and for industrial and commercial developments of similar scale.

## 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.

Neither agree nor disagree

## 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 opinion

## 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?

Neither agree nor disagree

## 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 opinion

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.

There is also a linguistic and socio-economic logic in designating regions differently, with the whole of West Wales from Carmarthenshire to Ynys Môn in one region, but the focus on the Swansea Bay City Region, including Llanelli, works against this.

Calon Cymru Network works primarily in Carmarthenshire and Powys, in the proposed Mid and South West Wales region, and is not commenting on North Wales. Considering South East Wales, Calon Cymru is against any major expansion of Cardiff Airport because aviation is incompatible with efforts to limit the impacts of climate change, and also with the Welsh Government's commitment to reduce net emissions by at least 80% before 2050, compared with baselines in 1990/1995 (Environment (Wales) Act 2016).

In relation to Mid and South West Wales, Calon Cymru suggests that Carmarthenshire County Council's new proposals, in Moving Rural Carmarthenshire Forward, provide a framework for a sustainable way forward. The proposals include allowing villages and small towns to expand housing and work, including more, and more diverse, land-based activities and opportunities for new farm enterprise dwellings with off-farm income taken into account.

In the view of Calon Cymru, the Heart of Wales Line railway is a core transport route and should be designated as such in the NDF. The rural towns along this route, and not solely Llandrindod Wells, have potential to become exemplars of low-impact regeneration. A similar argument applies to the reinstatement of the Carmarthen to Aberystwyth line.

## 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.

Broadly agree, with the proviso that Objective 4, for sustainable economic growth, should be recast as the development of sustainable local economies.

## 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 comment

## 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 comment

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 comment

## 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?

In general, it is disappointing that 'Growth' remains the overall objective rather than resilience, and rural and urban areas are viewed as distinct entities. On page 29 there is a line that illustrates this fundamentally flawed approach:

'The Welsh Government wants rural areas to sustain themselves and meet the needs of those living there.'

This shows an ignorance of the fact that urban areas and their rural hinterlands have potentially mutually beneficial interactions. Rural areas have the potential to provide food, relaxation and spiritual sustenance and urban areas provide services and opportunities that arise from concentration of populations.

In fact the whole Spatial Strategy, summarised in simplistic and largely meaningless diagrams so beloved of policy planners, is open to question as, in spite of our and others' consultation response to the effect that the 'three region' approach leads to a rural region that makes no sense functionally or as a basis for a Strategic Development Planning, this approach has been retained. The flaw in this approach is almost admitted to on page 56 where it is suggested that, in the rural 'region', sub-regions may have to be focussed on. Yet again there is no mention of the importance of the Mid Wales line, just a meaningless and non-existent link drawn across the Brecon Beacons. Neither can we find any relationship between the NDF and the currently existing Technical Advice Notes which deal with National Planning and this is particularly marked when it comes to Renewable Energy Policy.

Policy 10 introduces the concept of Priority Areas for Onshore Wind which, I understand, the Powys Planners were dragged kicking and screaming into. There is a widespread view that TAN6 and its designation of Strategic Search Areas was ill conceived and poorly consulted on. The most glaring oversight in its approach was a failure to assess the robustness of the existing infrastructure and, in particular, the adequacy of the road network in rural areas and the grid network when it came to accommodating large scale generators. This resulted in widespread public opposition and the withdrawal of many development proposals. We now have a suggestion to have even more of the same and with no mention of whether TAN6 and its search areas are to be retained or replaced. The persistence of this 'big is beautiful' approach in yet another form is alarming. Where is the acknowledgment of the efficacy of micro generation utilising wind sun and water which can be just as effective without the harm to the environment and community cohesion?

And finally, where has One Planet Development gone!!?

## 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**

Pat Racher

**Organisation (if applicable)**

Calon Cymru Network CIC

**Preferred contact details (email/phone/post)**

[REDACTED]

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*