

## **Consultation Response Form**

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<u>Organisation (if applicable)</u>	<b><u>Elan Valley Trust</u></b>

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

We welcome many of the outcomes in the draft NDF. However, we believe the outcomes do not fully capture the potential for rural areas to deliver:

1. High quality landscapes, valued nature and resilient ecosystems that provide a range of services to society;
2. sustainably produced food and other products including energy;
3. health, wellbeing, learning and leisure opportunities for all in society;
4. affordable and sustainable places to live.

The ambition should be to deliver these while ensuring no net loss of people or livelihoods from Wales rural areas.

Notably:

1. The ambition to deliver 'biodiverse' ecosystems does not properly capture the need and challenges of restoring and protect Wales valued nature.
2. Meeting Wales' climate obligations (alongside those for nature and sustainably produced food) cannot be achieved without a clear-eyed focus on what rural areas currently do and can achieve.
3. The omission of landscape quality as an outcome is a gaping hole despite explicit acceptance of this in the rest of the document for eg in NPs and AONBs.
4. Wales rural areas already offer a lot and can offer more than they currently do to urban society as well as rural society as places to connect with nature, dark skies, sustainable food production, sources of health, learning and wellbeing and our shared cultural heritage. These opportunities need recognising at the

level of the NDF if they are to be met.

## 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 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 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:

Policy 4 needs to do more to recognise the inequality in digital provision that currently exists. As with the Post Office there should be an onus upon providers to deliver a universal service obligation for all forms of digital *including mobile* across rural areas.

It is not clear what the phrase 'the WG wants rural areas to sustain themselves' means. Rural areas offer a lot to wider society that is currently under-recognised and under-remunerated (although EU funding has in some ways plugged gaps in the past). These services include those associated with water provision, climate mitigation, nature, sustainable food, wellbeing etc. With a clear expression in the NDF that growth will be focused in urban areas it is critical that the NDF also recognises the need to ensure that a balanced approach that ensures a viable and sustainable rural economy is taken. The suggestion that WG wants rural areas to 'sustain themselves' therefore needs considerably greater clarity.

### 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 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?

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

As noted above, we believe that there should be a universal service obligation imposed upon mobile service providers to deliver across ALL of Wales. In the absence of strong measures past record shows that providers will do all they can to avoid equitable / universal provision.

## 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 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?

As with Mobile coverage we believe there is a strong likelihood that provision will be significantly poorer in rural areas. With rural residents and visitors being even more dependent on private vehicles it is critical that this is not allowed to happen. Keeping the situation 'under review' is an ambition in need of considerable strengthening.

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

### Comments:

A commitment to achieving net biodiversity gain should be written into the policy so that development must positively contribute to nature recovery. As written, the NDF policy is weaker than and inconsistent with PPW.

There should be explicit reference to Developments of National Significance (which are determined by Welsh Government) making a contribution to nature recovery.

Priority species should be explicitly covered by the policy not just habitats.

A strategic approach to developing a national ecological network that takes full account of species is needed.

Policy 9 around woodland needs considerable work. We welcome the ambition to have the right tree in the right place and agree that more trees could provide many benefits. However, we also recognise that previous afforestation efforts have left a mixed and often severely

detrimental legacy in many parts of Wales including the Cambrian Mountains. Nature, landscape quality, economy and a range of ecosystem services can suffer with poorly planned woodland expansion and it is important that the policy is a clear-eyed and strategic one with a focus on benefit rather than sentiment.



## 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<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 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 focus of solar technology should be on existing grey infrastructure. The impact of ground based solar arrays is significant for landscape but critically also for nature and other productive uses of the land. Because of the currently small areas with such arrays this impact is currently under-estimated, with limited cumulative impacts. A presumption in favour of development could dramatically change this and it is critical that we identify at the outset where the best places for solar actually are. It makes considerable sense therefore to focus solar capture on places where nature and productive land uses are already compromised. Grey infrastructure can and should be multi-functional! Planning permission for all new buildings including agricultural could, for example, assume that addition of PV is a requirement unless a good case is made otherwise.

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

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

While agreeing that a regional approach has value we do not understand the logic of including the urban areas along the South West coast in the Mid Wales region. We believe it would be considerably more logical to have the central region focused solely on the rural hinterland of Wales where a greater focus can then be applied to rural issues than is currently allowed for.

We believe that the landscape and needs of the Cambrian Mountains deserve and require a particular focus alongside those of the NPs and AONBs. The CMI is currently exploring a range of models of designation or different working structures that would suit our area and we urge WG to consider this work as part of the NDF process.

### 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?

[illegible]

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.

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## **11. 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.

## **12. 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?

### 13. 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?

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.

### 14. 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?

**15. 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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