


## **Consultation Response Form**

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<u>Organisation (if applicable)</u>	Wales Green Party

## 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 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:

The Green Party has major concerns about the way the Outcomes are framed. The NDF gives insufficient consideration to the connections between Outcomes in driving sustainable development. Outcome 6 suggests that the primary purpose of Development Plans is to enable economic development. Culture, heritage and environment are seen as being subservient rather than important in their own right as set out in the Wellbeing of Future Generations Act. The Green Party argues that economic growth, without considering issues of inequality and environmental and community impact (including climate change), is unsustainable.

It is true that the environment, biodiversity and the climate crisis are dealt with in Outcomes 9, 10 and 11. Further the North Wales Regional Overview gives priority to "Decarbonising society and responding to the threats of climate change....." This should be followed through here by making explicit the NDF's role in achieving balanced Outcomes to improve national well-being. The Outcomes are framed separately which does not resolve inherent conflicts between Outcomes. It is strongly recommended that the Outcomes are reframed in terms of achieving sustainable development as required under the terms of the Wellbeing of Future Generations Act and referred to elsewhere in the NDF. As well as referring to "Figure 1-2: Impact assessments to be integrated alongside SA/SEA" in the ISA, exploration of the circular economy concept referred to in Outcome 9 and the use of the Public Health Wales: Determinants of health and well-being in our neighbourhoods looking at factors like the built environment, the local economy, climate stability and community would assist this.

Outcome 7 appears to be primarily concerned with travel within urban areas. The Green Party wishes the NDF to include in this Outcome the provision of sustainable transport between towns and within rural areas and links to other countries in the UK and beyond.

## 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 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:

The Green Party strongly supports the principle of 'town centres first' and regrets the development of out-of-town business parks.

In terms of rural communities (Policy 4), the Green Party supports sustainable farming diversification and multiple use of agricultural land and buildings, for instance for appropriate renewable energy, tourism projects).

### 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 checked="" 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?

The Green Party recognises that the current system of housing delivery is failing to provide sufficient affordable homes, but this is due to a broken housing market an

overreliance on the private sector to deliver housing. The Green Party does however recognise that it is not the place of the NDF to allocate the required resources to public sector housing providers and reverse the decline shown in the graph of Housing completions 1974-2018: Wales.

The statement that “The reuse of publicly owned land will be important to the delivery of these homes” is supported. Not only this but local planning authorities should be encouraged to assemble and prepare sites for development. These could be provided on land purchased by the authority, or through partnership with landowners.

### 3. 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?

### 4. 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?

### 5. 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"/>

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

The Green Party considers that the NDF should be more proactive in creating and enhancing wildlife corridors. The wording of Policy 8 focuses on safeguarding areas of biodiversity rather than actually improving biodiversity and promoting links between areas. The Wild Pathways on Anglesey collaboration project between North Wales Wildlife Trust, Natural Resources Wales, Public Health team BCUHB, Gwynedd and Anglesey County Councils, Anglesey primary-care cluster, and others and facilitated by Bangor University is a current example of a proactive approach and should be used as the basis for rewording Policy 8. Further information is available at

[https://research.bangor.ac.uk/portal/files/24453858/Adroddiad\\_gweithdy\\_effaith\\_Impact\\_workshop\\_report\\_002\\_.pdf](https://research.bangor.ac.uk/portal/files/24453858/Adroddiad_gweithdy_effaith_Impact_workshop_report_002_.pdf)

Policy 9 for more woodland planting is supported in principle. It should specify the planting of native species for landscaping, ecological and flood prevention reasons. Woodland cover in Wales was 306,000 hectares (ha) in 2016 so the target of 2,000 hectares per annum represents an increase of less than 0.7% and should be increased.

The Green Party supports Priority Areas for Solar and Wind Energy set out under Policy 10. It considers that reference to social and economic benefit to local communities (including safeguarding the livelihoods of family farms – the bedrock of the distinctive Welsh culture and landscape) should be referred to as a material planning consideration in the Policy.

The Green Party wishes to question how the Priority Areas for District Heat Networks have been chosen. It would seem logical to include all the Regional Growth Areas designated in the Spatial Strategy. For instance, there is consent for a District Heating System on the former Anglesey Aluminium site at Holyhead as part of a planning permission for the sort of mixed use development envisaged under Policy 14.

## 7. 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.

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

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

## 10 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.

The Green Party supports Policy 18 in promoting the coastal arc from Caernarfon to Deeside as the focus for managed development, reflecting this area's important sub-regional role linking to the primary growth area of Wrexham and Deeside (see also comments about the Spatial Strategy above). It should go further and link across Anglesey to the Port of Holyhead strategic gateway and thus include the Menai Strait 'bridgehead settlements' and Llangefni as development areas within the Anglesey Energy Island Enterprise Zone. The NDF should also set out support for reopening the region's rail links such as that connecting Bangor to Caernarfon.

In addition to the above, the NDF should express support for reopening the rail link between Aberystwyth and Carmarthen. This proposal would have the potential to vastly improve north-south public transport links within Wales.

Cruise ships have significantly adverse impacts on air pollution, climate change and local water quality. Accordingly, the Green Party does not support increasing the port of Holyhead's capacity in order to accommodate cruise ships, as proposed in Policy 20. We consider that this proposal would not be consistent with the Welsh Government's declaration of a climate emergency.

In order to promote tourism, Policy 25 should explicitly state that the conservation of the visual amenity of the Pembrokeshire Coast National Park, which has been significantly compromised by the oil refineries and storage facilities around the

Haven Waterway, should be given priority over further visually intrusive industrial development. Given that renewable energy technologies are now becoming cheaper than fossil fuels, the Haven Waterway should be designated as a hub for renewable energy research and development, in order to ensure that it has a sustainable post-oil/LPG future.

The Green Party does not support the growth and development of Cardiff Airport, as this is not compatible with tackling the climate emergency which the Welsh Government recently declared. Such is the adverse impact of flying on the environment, airport expansion is also grossly incompatible with the Welsh wellbeing goals. We note that in the table showing the “relationship between the NDF’s policies and the ‘Outcomes’ it sets out to achieve”, Policy 32 for Cardiff Airport has less positive relationships than any other Policy in the NDF. The claim that Cardiff Airport is an essential part of Wales’ strategic transport infrastructure and a key driver within the Welsh economy is questionable; given the airport’s peripheral location within Wales as a whole, much of the Welsh population is better linked to airports in England.

## 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.

The Table at the end of the NDF – “The relationship between the NDF’s policies and the ‘Outcomes’ it sets out to achieve” should indicate whether the relationships are positive or negative.

The ISA Objective 4 “To create opportunities for sustainable economic growth, diversity and business” should include opportunities for greater economic equality.

## 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?

The Green Party considers that the NDF, in supporting diversification projects (e.g. related to energy production) on family farms, should recognise their important contribution to safeguarding the use of Welsh.

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?

The Green Party considers that the NDF should support an integrated national transport strategy to improve sustainable links within Regions and between the Regions and with other counties in the UK and beyond. References to transport in the NDF are not consistent with a well-connected approach. Transport links to North West England only is considered under a policy (Policy 22) in North Wales but there are no overarching transport policies in the other two Regions. Much more consideration should be given to reopening train links, especially those which would facilitate better north-south connectivity.

## 15 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**

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