

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?

Strongly 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:

Agree generally. I think it would be better to focus on other measurables other than growth that we know are beneficial for our communities. Growth is a really poor measure of progress as it can be achieved in ways that ultimately harm society. Examples of better measures could include. Greater equality, better health, improved wellbeing, better access to jobs and local services, healthy more biodiverse ecosystems, more resilient local economies etc.

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				
			X				

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

Public land and buildings should be made available through asset transfer or long term leases to support communities to have a more direct stake in their community and help to deliver sustainable, vibrant communities. Community Energy is an example of where communities have often tried to do this, but it could include community land projects, cooperative housing and community services such as pubs, shops etc. Community Rights should be introduced to enable communities to highlight local assets and have the opportunity to develop those assets in a way that meets their local communities needs and delivers the 11 outcomes and WFG Act goals.

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?

We would also encourage social enterprise and housing co-operatives. It will be important that all new homes achieve zero carbon ratings otherwise we are creating a problem for the future inhabitants of those homes and of the planet.

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?

No opinion

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

No Response

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?

Agree

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?

This should particularly support areas with a significant proportion of off street parking where it is difficult for residents to switch to electric vehicles due to poor charging infrastructure. It should also be important for all planning authorities to highlight where strategic rapid charging can be installed to ensure there are no gaps on the network. However, particularly in large towns and cities we should be trying to move away from car travel as it is a very poor way of moving around urban environments and slows down other better forms of transport such as buses, cycling etc as individually owned cars take up a disproportionate amount of space on the roads.

<https://www.theguardian.com/cities/2015/apr/28/end-of-the-car-age-how-cities-outgrew-the-automobile>

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?

We welcome the recommendation that local social, economic and environmental benefits should be taken into account when making decisions outside of priority areas and that social, economic and environmental benefits will be maximised in the priority areas. However, we are unsure about the method that this will happen and how these benefits will be weighted in planning decisions. We are also unsure as to how Welsh Government will ensure that all energy projects have an element of local ownership to maximise the benefit to Welsh communities. Will it be a condition of any planning application to demonstrate.

There is also no mention in this about the consideration of enabling turbines with a greater tip height. The larger the turbine the more efficient they are and larger turbines may make better use of wind resources in a particular area.

We also believe that visual impact is subjective and very difficult to determine, therefore great care needs to be taken when using visual impact as a key determining factor. Some people like the look of wind turbines for example. A poll conducted by ICM suggested that 49% of people would support a wind turbine being erected within two miles of their home, with 22% against. Support rose to 68% if the project were community owned (Guardian, 23 October 2012).

https://www.climateexchange.org.uk/media/1734/shaping_our_energy_future_-_how_the_public_feels_about_renewable_energy.pdf It is worth recognising that people are more supportive of community owned wind turbines and therefore this could be something which is favoured in planning decisions.

Wales has declared a climate emergency and is aiming to be carbon neutral by 2050, there is likely to be increasing pressure to do this even faster than by 2050 and many political parties and campaigning organisations are asking for this to be done by 2025 or 2030 and clearly Renewable Energy is crucial to this becoming a reality. There is a risk that by splitting areas into priority areas and areas outside the priority areas that developments outside of priority areas could be looked upon less favourably when they may be good projects.

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?

Neither agree nor disagree

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?

Strongly disagree

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.

Given the climate emergency there is greater need for localism and certainly any transport links should be sustainable forms of transport wherever possible. The growth of Cardiff City airport is completely at odds with a climate emergency and should not be included in any strategy.

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.

No Response

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 Response

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 Response

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 Response

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?

No Response

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

[REDACTED]

Organisation (if applicable)

Community Energy Wales

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.

Keep my response anonymous