

From: [REDACTED]
To: [NDE](#)
Subject: NDF Consultation
Date: 01 November 2019 16:38:02
Attachments: [draft-national-development-framework-response-form_\(1\).pdf](#)

Dear NDF Team

Please find attached a response to the above Consultation. Should you have any queries relating to this response please let us know?

Regards

Joan & John Filce

Consultation Response Form

Your name	Joan & John Filce
Your address	[REDACTED]
Preferred contact details (email/phone/post)	Email :- [REDACTED]
<u>Organisation (if applicable)</u>	N/A

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:

4) It is unrealistic to expect to create a million Welsh speakers by 2050. Welsh is not a commercial language and will not have a real edge in a global economy where a majority of developing countries speak English.

6) The current policy of down grading English in correspondence and on signage tends to discourage rather than encourage tourism. This runs counter to the Welsh Language (Wales) Measures 2011 but is an impact that has not been adequately addressed. The examples set in India, China, the Far East and the Americas use English as a prime language and the aspirations of 1 million Welsh Speakers in the next 30 years is too ambitious, especially as the language spoken in the north is different from the west or south. Modern Welsh is a contrived language and we risk 3 different versions of Welsh in this country. Efforts should be made to unify the language as a 1st Stage

7) Methods of travel need to be made more economic if the reliance on private motor vehicles is to be reduced, in addition the trend to reduce bus services to rural communities must be curtailed and services somewhat increased.

9) Not sufficient emphasis is placed on the protection of the rural countryside and its important farming resource BMV land. If we are to produce more food then more care is needed to ring fence BMV land for future generations.

10) More care is needed in the planning system to protect flora and fauna across Wales. With climate change there will be dramatic changes in the endemic flora & fauna but wholesale damage to ecosystems cannot be rectified by mitigation measures that take years to become established under planning.

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 checked="" 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 checked="" 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:

In rural communities and hamlets, the development of small new housing initiatives should not be frustrated by heavy handed policies that prevent sensible rural development to sustain the viability of village and hamlets. Present policies often preclude such development in favour of larger urban locations and suffocate smaller sites that could enhance and contribute to the survival of rural villages & hamlets.

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?

Local Authorities should be encouraged to grant fund affordable homes in those areas where sites are not financially viable but where the need is greatest. There should be no policy that requires financial contributions from viable areas into other locations as all this does is to force up the average cost of the other properties on that development site to the detriment in the long term of all purchasers.

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?

No comments to add.

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 checked="" 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?

The roll out of electric vehicles underestimates the ability of the infrastructure to generate sufficient energy by green methods to effectively charge the anticipated number of electric vehicles. With homes being taken off gas and oil heating in the mid-2020s there will times in the future when demand will outstrip supply. Charging capacities of 43kw have not been taken into account in setting this policy. Concentration on fossil fuel efficiency improvements to produce very low emission vehicles will be an essential element to make this policy work.

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"/>

To make this policy work there needs to be a fundamental retraining of Town Planning staff to make any inroads into this policy. Experience has shown that some LPA staff regard these biodiversity and ecological issues as an opportunity to develop in areas they should be protecting. A fundamental shift in training and monitoring Planning activities needed if this policy is to be made to work. The younger generation of planning graduates may be alert and could support the policy; most of the older generation are often too set in their ways to make any in-roads with the policy. As part of the green infra structure a green belt is absolutely essential to stop the encroachment of England across the border in North Wales. Developers locally are intent on building right up to the border on both sides of the divide. In N Wales, England is less than 70m away along the A483/B5445 and the gap is being further threatened by inappropriate development in the countryside. The limits of the Green Belt should be detailed by WG as the 2 key LPAs already allow development in Green Barriers & on BMV land and this needs to be curbed to prevent inappropriate development where no need exists.

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

The policies should recognise that the energy required to create these systems may be greater than the economic returns of the scheme. Experience has shown that very careful design of these systems is needed to ensure that they can be maintained and serviced and that system losses do not exceed the losses that would be encountered on a dispersed system. The load factors need special attention to make plant viable.

District heat networks are a good idea but not always practical or economic. Practical experience has shown that the life expectancy of most pieces of plant have a life expectancy of no more than 10 to 12 years then obsolescence must be taken into account as system replacement parts are invariably not available and a fresh start is required. At this point a zero or negative energy balance may be the appropriate final replacement position with a net carbon deficit rather than a positive impact.

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"/>

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 checked="" 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	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"/>

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 checked="" 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 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 introduction of 3 Regions is a good recommendation. For development to take place on a regional scale is most rational as it requires policies to benefit 0.5 million+ population satisfactorily rather than the piecemeal parochial considerations to many overarching issues. The splits recognise the true nature of the way the country has developed and should build on the strengths of each region and especially its transport and infrastructure links. The opportunity must be taken to build north/south transport links to avoid leaving Wales to travel through England to speed journey times.

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.

The ISA seems to be very comprehensive and covers the diverse issues well. The problem with the monitoring indicators is that there are so many and the criteria against which monitoring is to take place have not been developed or agreed. It is pointless introducing many more monitoring items if the initial dataset has not been determined. Much more Control and monitoring of agricultural land (especially BMV) is needed to ensure that there actually is a good future and natural resources for generations yet to come. Compliance with PPW10 Para 3.62 needs to be reinforced as the ineptitude of at least 1 LPA in preparing an LDP in taking 15years, since the 2004 Planning & Compulsory Purchase Act, was introduced will frustrate this requirement for many years to come. The NDF therefore can/should be prescriptive in this context if the LPAs involved actually get an LDP approved as the forerunner to an SDP.

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?

No comments to add.

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?

The promotion of the Welsh Language should be allowed to develop naturally; undue pressure will result in resentment by the younger generation. The Older Generation will not readily change their ways. Encouragement is required rather than compulsion together with the development of opportunities to use Welsh in a commercial way. The waste of resources by creating everything in 2 languages should be carefully reviewed and those individuals that require communication in Welsh should be properly targeted rather than the scatter gun approach of targeting everyone in a wasteful manner.

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.

I) A policy that focuses attention on the very young /pre-school is the way forward as infants need to be steeped in the Welsh Language at an early age. Unless an all Welsh speaking environment is retained throughout life, the ability to converse fluently is gradually lost. Welsh should not be seen as a competitor to English but as a bonus language. At present there is no incentive to learn Welsh as this has no place in the commercial world outside Wales. As part of Welsh culture, the learning of Welsh should be encouraged but it should be accepted that there will be a large fallout rate as children progress to adulthood. Our discussions with Welsh friends & colleagues confirm this dilemma that they all have faced leaving a full time Welsh speaking family environment to gain experience in the wider world.

II) At present there seems to be adverse effects on the non-Welsh speakers as there is now positive discrimination in some parts of Wales if Welsh is not spoken. This will ultimately affect employment and the recruitment of the best skills from the market place and may well jeopardise the Welsh economy in the long-term contrary to the aims of the NDF.

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?

i)	Overall the NDF draft is seen as a very good document, however much more control and monitoring of agricultural land (especially BMV) is needed to ensure that there actually is a good future for generations yet to come. In addition, the overriding compulsion in the use of the Welsh Language in the future need to be somewhat tempered to ensure that language divisiveness is not fostered in society.
ii)	The changes to the Integrated Sustainability Appraisal Report have been followed through but in places are extremely difficult to logically find or locate. In such circumstances it would be better if the annotation requirements of ISO 9000 were used i.e. strike through and paragraph/words inserts marked in the margins. Version control needs to be improved. Page numbering needs to be improved as the random introduction of tables with no continuity needs to be addressed, otherwise a certain element of confusion exists. All pages need to be consecutively numbered and footers need to have a date and version added. The Draft NDF Document does not suffer from these problems and was very readable and easy to follow but a date of issue in the footer would be an improvement.

16. Are you...?

Providing your own personal response	<input checked="checked" type="checkbox"/>
Submitting a response on behalf of an organisation	<input 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"/>
--	--------------------------