

# 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?

Neither agree nor disagree

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

Agree with some of them

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

The outcomes amount to a series of idealised aspirations but it is not clear that all of them are measurable or achievable.

## 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...

*No Response*

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

*No Response*

## 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?

*No Response*

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

*No Response*

## 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 Response*

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?

*No Response*

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?

*No Response*

## 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?

*No Response*

## 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...

*No Response*

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?

*No Response*

## 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.

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?

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?

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?

Agree

**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 some logic in identifying three distinct regions for the purpose of making plans for future development. That said, the difference between the situation of, eg Llyn and Deeside are so marked that grouping them together for administrative purposes seems excessively simplistic: it would make at least as much sense to group Gwynedd with the middle and south west of the country. And even if, as the draft says, many policies are best considered at the regional level, there are others that may not be, and there is no case made for why exactly the regional authorities should be given the powers and responsibilities that are being proposed. Another flaw in the proposed approach is that the emphasis appears to be on charting progress for these individual regions in isolation, as opposed to developing truly national objectives that will see the regions work together and achieve collective progress within a common vision. Transport links are a case in point. The draft makes it clear that the Government sees developing such links between the north Wales region and the north of England as the way forward for the region, and the document also speaks approvingly of co-ordinating economic development between south east Wales and the west of England. This emphasis on continuing the historic economic dependence of parts of Wales on neighbouring parts of England is at the expense of any commitment to developing a co-ordinated infrastructure for Wales. There is no suggestion, for example, of improving transport links within Wales with a view to encouraging economic development and communications within the country. This strategic focus on east-west connections at the expense of intra-Wales connections can only weaken the internal integrity of the Welsh economy and facilitate continued population flows from and to the three Welsh regions. Another, related weakness of the draft's concentration on three regions is that it does not enable a truly national strategy to be developed to protect and promote the Welsh language. The draft acknowledges that, in each of the three regions, Welsh is a minority language. This will inevitably result in the language being treated, in the strategic planning process, as a matter of minority concern and peripheral importance. The framework needs to incorporate a much more pro-active and genuine commitment to protecting and promoting the Welsh language: this can best be achieved by identifying, on the national level, areas where the Welsh language is spoken by different bands of local residents and ensuring that the plans and policies of local authorities, in every region, reflect in all practical ways a nationally-recognised need to ensure the sustainability of the linguistic environment. Without such a co-ordinated approach, whereby the special character of Welsh-speaking communities is respected, development plans that are framed on a region-wide basis can be expected only to weaken further the position of the language. Both transport and the Welsh language are matters that would be most effectively approached on a co-ordinated national basis, and, in the latter case especially, there needs to be provision for a much greater influence at the local level.

## 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?

Re Outcome 4, the Welsh language can only thrive, in any real and sustainable sense, if it is spoken preferentially by a critical mass of people within communities (as opposed to classrooms). Research shows that, in circumstances where two languages are spoken in a locality, especially where one language is as dominant as English, unless the indigenous language remains spoken by a sufficiently high percentage of people, the dominant language will invariably become the principal language of communication. This development will have implications, over time, for the frequency with which individuals speak the indigenous language, for their fluency in it, their willingness to speak it, and in due course the likelihood that they will pass the language on to the next generation – this, surely, is what we mean when we speak of the sustainability of a language. Successive census returns have reported a significant decline in the number of communities where a majority of the local population speak Welsh, caused partly by outward migration but also by substantial levels of inward migration. For this reason, I suggest that if the Government is committed to ensuring a thriving Welsh language, and achieving its 2050 target, it must identify areas of the country that are particularly important to the survival and prosperity of the Welsh language and ensure that the linguistic character of those communities is factored strongly into the planning process so that, to be approved, developments must be of a size and nature that do not pose a material threat to the sustainability of the language. Further, the Government should address the situation of the Welsh language specifically and in tangible ways in the NDF, bringing together not only factors relevant to housing supply but economic and other initiatives. Merely stating that it wants the language to thrive, without committing itself to taking the concrete steps that are needed to protect and promote Welsh as a living language, will not be sufficient.

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?

Re Outcome 1, I find it alarming that so little attention is paid, in the draft NDF and in accompanying documents relating to the housing planning process, to the crisis in health care in Wales and how this crisis impacts on the Government's plan of action. The health and social care systems are facing increasing strains, which may or may not be exacerbated post-Brexit, and the sustainability of the primary care system is a particular anxiety, with a high proportion of GPs approaching the end of their careers: it will be recalled that one local health authority in west Wales has advertised for a salaried GP for over a year and received not a single application. The thrust of the draft NDF, and accompanying documents, appears to be focused on increasing the pressure and level of compulsion on local authorities to build more houses, whether they see the need for them or not. This is resulting in massive new housing developments, in Cardiff and elsewhere, which will impose very significant, possibly impossible, pressures on existing primary and secondary care services. A genuinely sustainable strategic approach to achieving the statutory well-being goals would ensure co-ordination between housing plans and health care, so that every proposal for housing development would have to incorporate specific provision for how new residents would be able to access primary and secondary health care and social care services. To focus solely on setting and meeting building targets, without taking into account and making advance provision for the health needs of eventual residents, is not only irresponsible and symptomatic of fragmented government, it appears to me to be in clear conflict with the well-being goals.

Re Outcomes 1, 7 and 11, the current planning system is resulting in large housing developments, sometimes approximating to new towns, on green field sites that are far from workplaces and are not served by any form of rail transport, which can only result in new residents travelling about by means of motor transport, which will more often than not take the form of private cars. Such green field developments are hugely, obscenely, profitable for the developers concerned but are not consistent with any declared public policy goals. In particular, they make a mockery of the Government's commitment to the statutory aim of prioritising commuting to work by walking and cycling, and are clearly inconsistent with the Government's claim that its primary commitment is to decarbonising Wales. Unless the Government's approach to planning incorporates substantial investment in alternative forms of mass public transport (I am reminded of the £1 billion + that was earmarked for the M4 relief road), the green field developments that the Government seems to be determined to expand will inevitably result in increasing road congestion and pollution of the environment, as well as, of course, the further destruction of the irreplaceable natural environment which has always contributed so much to Welsh people's quality of life and sense of communal identity. Rather than continuing to focus on the urbanisation of the physical environment, perhaps some innovative thinking could be applied to the current commercial difficulties being experienced by the retail sector, with a view to considering whether more new housing could be channelled towards town and city centres instead of the natural environment.

## 16. Are you...?

Q24. Are you:

Providing your own personal response

## 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 JOHN DAVIES

Organisation (if applicable) Mr

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*