

**From:** [Maggie](#)  
**To:** [NDE](#)  
**Subject:** NDF response form  
**Date:** 14 November 2019 09:57:11  
**Attachments:** [Official response form - MF.doc](#)

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Sirs

I attach my completed response form for the National Development Framework consultation.

Would you please acknowledge receipt of my response.

Many thanks.


Miss M L Flanders

[REDACTED]

[REDACTED]

[REDACTED]

## **Consultation Response Form**

|   |  |
|---|--|
| Your name                                       | Ms Margaret Flanders   |
| Your address                                    |  |
| Preferred contact details<br>(email/phone/post) | Post   |
| <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 type="checkbox"/> | <input checked="" 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:

|  |
|--|
|  |
|--|

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

More detail should be given on how such policies will relate to residents living in fully rural areas, not just those in areas around rural towns and villages, and how these policies will be achieved for those rural residents.

### 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 checked="" 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 checked="" 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?

The aspiration of the policy is fine, but I don't see how the private mobile phone companies can be persuaded to provide better coverage in the rural areas where it is not cost-effective for them to invest in better equipment etc. Will the Welsh Government be giving the mobile phone providers financial incentives to improve the coverage, and if so, how will that be funded? The policy seems unrealistic to me, as I don't see how it could be achieved.

## 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?

No mention is made of what help, if any, the policy will be to people living in fully rural areas.

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



## 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                   | Don't know               | No opinion               |
|---|--------------------------|-------------------------------------|----------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|
| Large scale wind and solar developments | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>   | <input type="checkbox"/> | <input checked="" 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?

- No information is given as to how the wind and solar energy Priority Areas relate to the TAN 8 areas – will the new Priority Areas mean that the TAN 8 areas will be cancelled once the NDF is in place?
- It is dreadful, and totally unacceptable to local residents, that the majority of uplands Powys is to be designated Priority Areas for large-scale wind and solar developments. This will completely destroy our beautiful countryside and will have considerable adverse effects on nearby residents. These Areas should be greatly reduced in size.
- Policy 12 states that large-scale wind and solar energy developments may also be appropriate outside the Priority Areas. Those areas take up enough of the countryside as it is and stating that there may also be developments outside those areas is totally unacceptable.
- It is totally unrealistic to designate these Priority Areas without also including consideration of how the required grid connections will be made and the adverse effect such connections will have on local residents.



5. Large developments, with all the additional developments for the required access, will have a huge detrimental effect on the physical and mental health and well-being of nearby residents and will greatly increase the inequality of those people as compared to residents in urban areas. **The Welsh Government should insist that any planning permissions given include a proviso that the developers have a legal obligation to provide financial compensation to those residents who are adversely effected**, along the lines that national UK developments such as major roads, railways etc, financially compensate affected residents. It is **totally unacceptable** that residents such as myself should have to put up with the reduction in value of their homes that arises from construction of such large energy developments, in some cases making their homes virtually unsaleable, with no financial compensation whatsoever.
6. In cases where the Planning Inspectorate recommends refusal of planning permission for such developments, Welsh Ministers **must not** be permitted to overrule the Inspector's recommendations, as happened with the Garreg Lwyd Hill windfarm development in Powys. Wales **must** remain a democracy, and **MUST NOT BE TURNED INTO A DICTATORSHIP.**

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

I consider that separate policies should be brought in for the very rural areas such as uplands Powys, which are totally different to the development centres in the south, round Swansea etc, and which therefore require a totally different approach.

## **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.

## **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?



## 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?

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.

## 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?

Policy 6 refers to the need to increase mobile phone coverage, but no mention is made anywhere of the need to improve Internet broadband coverage and provide reliable and affordable coverage in the rural areas which is on a par with the provision available within urban areas.

**16. Are you...?**

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