

## **Consultation Response Form**

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<u>Organisation (if applicable)</u>	Individual

## 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 NDF is the development plan that is top of the hierarchy of plans in Wales and as such is intended to set the planning context for all plans that fall below it. The draft NDF as proposed does not set an adequate context for its intended purpose and leaves the reader unsettled as to how effective and perhaps problematic the NDF will be in allowing the SDPs and LDPs to perform in the manner they are expected to do.

The NDF is not open to scrutiny and that is a weakness. The document is not evidenced in the way all other matters in planning must be. All other development plans and all planning applications need to be justified, evidenced, examined and through dialogue and negotiation decisions are then made. The NDF at times reads more like a political document than a planning document which is a real shame. It is not a spatial document that guides development; again a shame.

A concern that has been expressed by both the public and private sector planning professionals is how the NDF may present unworkable situations for the SDP and LDPs. One example is that the NDF requires a Green belt in SE Wales but what if at SDP / LDP stage such a proposal cannot be justified? There would be an impossible tension between the competing matters. If aspects of the NDF are not deliverable (and much is not evidenced) then how can the SDP / LDPs prove deliverability?

The NDF does not appear to aspire to much in terms of growth and development. It would seem that the NDF could limit the ambitions of the City Deal.

The eleven outcomes stated in the NDF have varying relevance to or being influenced by planning and could be conflicting. There are matters that are not addressed that the NDF may have been expected to such as

- private sector housing appears to be discouraged rather than encouraged
- what happens now that the M4 relief road has been scrapped

## 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<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 on the spatial strategy or key principles for development in urban and rural areas, please tell us:

The text on page 22 of the draft NDF is written as though it is trying to persuade (not even explain to) readers that the spatial strategy meets the outcomes. References to social justice in relation to developing urban areas compared to greenfield development is a curious choice of words. Having a strategy that is so bluntly brownfield good and greenfield bad will result in poor planning choices through reduced choice and opportunity and will without doubt result in a reduction in land supply and thus delivery.

Sustainable growth, sustainable development, increasing biodiversity through green infrastructure and many other matters listed on page 22 are already set out in PPW and thus do not need to be repeated. The text on Page 22 should be deleted.

Page 24 in my view is too dictatorial over the SDPs and LDPs rather than letting those planning bodies determine what is the best solution for their regions / areas. The NDF should be setting out spatial solutions for matters of national scale only and not interfering with matters that should be determined at more regional and local scales.

Policy 1: It would be helpful if the NDF set out where any significant growth areas

would be, otherwise the policy does not add anything not already in PPW or should be in SDP/LDPs. Transit orientated development could be defined. Policy 1 should also allow new significant developments where new transport and social infrastructure would be delivered as part of a sustainable development. Such development could include large urban extensions and new settlements.

Policy 2 and 3: the NDF should be dealing with land use not land ownership. The aspirations of Policy 2 may have some grounding in the NDF in terms of locations of public services but Policy 3 should be deleted.

The Spatial Strategy should be outlining the spatial vision for Wales. Where are the strategic transport investments, energy proposals, employment areas of national significance and any new environmental / landscape proposals on a national scale? These and other land uses of national significance should be set out on the Spatial strategy plan and explained in the accompanying text. Repeating policy already in PPW is not appropriate nor is taking spatial decisions better done at regional or local levels.



### 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 text on page 30 proposes getting housing delivery up to 8,300 units per year. This is a significant increase on the current rate of delivery. To achieve this will require much more land for housing that is desirable and developable and viable to come forward. However the NDF does nothing to encourage the release of land for housing purposes. Reliance on public sector land is not enough to make such a change and in any case landownership is not a planning matter. Indeed the NDF sets pretty serious constraints to identifying land for housing uses. This lack of support in the NDF along with the other serious matter of the potential abolition of TAN1 and the maintenance of a 5 year land supply are more likely to lead to a decrease in house building than an increase.

The housing numbers presented should be accompanied by a statement that they may be adjusted by SDPs / LDPs as appropriate supported by the necessary justification. If not then the housing numbers used in the NDF need to be fully justified with appropriate evidence.

Page 31 infers that the 'delivery gap' has arisen from the private sector failure when the private sector and even RSLs have been asking for the planning system to be improved to allow housing delivery to improve. I do agree that there is scope to significantly increase the building activity of the RSL sector and direct council building without compromising the activity of the market sector. Indeed if the market sector was allowed to expand then much of the affordable need would be delivered alongside the market homes.

Policy 5 should be rewritten to be relevant to delivering all sectors of housing. The NDF should identify areas of significant housing growth including opportunities for urban extensions and new settlements. Limiting the supporting text to matters of public land ownership is inappropriate in a planning document and will result in land allocation choices being limited and the potential selection of housing sites that are not in the best locations. Landownership is not a planning matter.

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 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 improve mobile phone coverage in the areas which currently have limited access?

In my view the Policy and the supporting text should be in PPW and not the NDF.

## 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 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 enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

In my view the Policy and the supporting text should be in PPW and not the NDF.

## 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	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 need for improved biodiversity and new and improved GI in both new and existing developments is supported. I do not however agree that this is a matter for the NDF in the way it is currently presented. It is better contained in PPW and developed into site specific matters and detailed policies in SDP and LDPs.

The NDF could have looked instead at the areas of national significance (National Parks, AONB, Wales Coastal Path) and sought to establish how these may be used / developed. Perhaps a transport strategy for such facilities where getting people to them in a manner other than the private car. Are there opportunities to create more facilities on a national scale that could have been identified?

The Policy for a National Forest is interesting and one that I personally support. The NDF does not however set out anything spatially that I would expect to see for a nationally significant asset.

District heat networks at a scale of 100 units will be difficult to achieve. There are few examples at present that have been successful. Caution is advised until such matters can be proven to be deliverable.

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

My comments are limited to the South East region only.

Policy 27: Cardiff is indeed growing and has catered already for such growth with their bold allocations in the adopted plan. Cardiff does however have capacity for further development in and adjacent to its boundaries without undue environmental consequences. Cardiff is a successful city and it seems to me that the Council are controlling the developments in a sensible and efficient manner. It should be for Cardiff to determine (along with the SDP partners) how much more the city expands or not. Relating new development opportunities to the Metro is sensible however the capacity of the Metro needs to be seen in the context of two way travel movements and not just commuting in and out each day at peak hours. The NDF does not acknowledge the potential for private sector to create new opportunities for Metro. New developments of scale could be useful for funding already identified but not committed Metro ambitions and / or assist in identifying new opportunities.

Policy 28: Newport: Enhancing Newport's status is commendable. However, the amount of brownfield development left in the city is limited. Newport has been extremely successful in bringing forward brownfield land for development, especially housing development. The consequence is that there is very little substantial brownfield resource left. To become a bigger regional player, the city will need to consider greenfield land releases. Policy 28 does not acknowledge the significant matter of the abandonment of the M4 relief road and what happens next. The motorway congestion is of such significance that it affects the whole regional economy of south east Wales. Alternatives to the M4 relief road are being discussed but the outcome of the working party are yet to be determined. One solution could



be a significant new development (new settlement) to the east of the city of Newport. Monmouthshire Council have been examining such a proposal and had been considering it a viable option for the LDP. Such a solution should not be ruled out by the NDF but should be made available to the region / Council for their further consideration while preparing the SDP / LDP respectively.

Policy 29: Heads of the Valleys: My personal view is that this area should be made into one single Local Authority Area or even a Development Corporation Area so that the significant and unique problems of the valleys can be addressed in an more informed and targeted manner.

Policy 30: Green Belt: this policy is the most shocking part of the NDF. This significant planning issue has been included in the NDF without prior discussion even with the LPAs. The NDF requires a green belt despite the NDF providing no evidence to support the proposal. Delegating the designation to SDP does not get around this. If the SDP is unable to provide sufficient justification in the environment when that plan is subject to scrutiny then there will be a situation where the two plans cannot be in conformity. Green belts are long term policies that need to be carefully thought through and properly justified. Along with the green belt designation needs to be full consideration of the long term effect on development and growth. This long term effect will need to be catered for while designating any greenbelt. My view is that the green belt is not needed. If however it is to stay in the NDF then the text needs to state explicitly that it would be subject to due scrutiny and evidence as part of the SDP preparation and only then designated if it passes the necessary tests. The NDF in such circumstances should also make clear that if the green belt is to be designated then how the offset growth is to be accommodated needs to be set out and explained. The accommodation of growth response needs to be for the same timeframe as the green belt is proposed.

Policy 31: The policy should be widened so that if proposals come forward where new Metro facilities can be created as a result of a new development (public or private sector led) it will be supported.

## **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?

I reiterate that the NDF needs to limit itself to matters of spatial planning at a national level. It should not be political. It should not include matters that should be included in PPW. It should not be imposing matters on SDPs or LDPs that will later be subject to scrutiny and evidence and the need to demonstrate deliverability. It should not be dealing with matters that are local spatial matters which should be determined as part of the SDP or LDP preparation.

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

Providing your own personal response	<input 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"/>
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