

From: [Sarah Bond](#)
To: [NDE](#)
Subject: consultation response
Date: 15 November 2019 17:44:50
Attachments: [draft-national-development-framework-response-form_0.doc](#)





Dear NDF Team,

Please find attached my response to the draft NDF.

Sarah Bond

Consultation Response Form

Your name	SARAH BOND
Your address	
Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	

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 checked="" 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:

The NDF policies as written will not achieve the desired outcomes.

See responses below.

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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input 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:

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?

Clearly, builders and housing associations are not able to deliver affordable housing. Outside of planning policy WG could encourage land trusts. Local residents could then self-build cheap eco homes via kits. This could be supported through the planning system and would increase social cohesion.

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 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?

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 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?

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

Why is biodiversity and RE lumped together for responses yet all other policy areas have their own response box?

Policy 8:

In April WG declared a climate emergency. In response the Future Generations Commissioner said :

- Wildlife populations globally have already declined by 58% since 1970 and this is likely to reach 67% by 2020. Here in Wales there are specific threats to soils, freshwater resources, marine ecosystems, wildlife and habitats, and **we are now among the most nature-depleted countries in the world**, with 1 in 14 wildlife species facing extinction. **Without healthy functioning ecosystems, we cannot resist, recover from or adapt to the changes facing our planet.**
- Around 11% of Wales' building stock is located in river or coastal floodplains, with 53,000 of those properties in places facing significant chance of river or coastal flooding.
- 84% of Wales' land is agricultural. The productivity of farming may be dramatically altered under different climatic conditions, particularly considering that some 80% of this land is already designated as 'less favourable', i.e. experiencing poor land, cultivation and climatic conditions. Climate change could also damage ancient

woodlands, hedgerows and other natural assets

Since the publication of the NDF consultation the State of Nature 2019 has been published which paints an equally bleak picture.

What Policy 8 offers is lip service to resilient biodiversity on which we all depend. WG celebrates its global responsibility by such as “The Size of Wales”, (which I think a highly commendable project), but is fiddling whilst Wales burns.

The opening paragraph reads. *“In collaboration with our partners, including Natural Resources Wales and local authorities, **we will take strategic action** to secure biodiversity enhancements, to safeguard ecological networks, and to maximise the use of green infrastructure and nature based solutions. Effective action is generally best undertaken at a regional or local level reflecting individual opportunities.”* **We will take strategic action – but when?** Climate change is happening now and we need to protect our ecosystems urgently.

Paradoxically, irresponsibly and completely inconsistent with safeguarding ecological networks and using nature based solutions WG has designated 20% rural Wales to their demi gods wind and solar electricity. These two technologies are the most devastating for environmental and climate adaptation purposes.

Why would any sane person wish to cover 10ha minimum with solar panels for a DNS project. This is not the hunky dory double use of the same space – sloping man made structures alter micro climate and hydrology and tie land up for 25yrs or more. If all solar farms were required to become nature reserves then it may be some mitigation and at least biodiversity would have some stepping stones amongst the increasing urbanisation and industrialisation.

Wind farms come with ground works and highway works that alter topography and hydrology, not to mention risk to flying fauna. What makes this government think it is sustainable to fill land, that is effectively a sponge, with concrete therefore displacing that same volume of water. Water needs virtually no gradient to move and it WILL GO SOMEWHERE ELSE IF ITS PATH IS BLOCKED. Assessments reveal how our fresh water systems are at risk both for quantity and quality. For the sake of Welsh residents and those in England who depend on our water we should be doing everything to protect it not risk it with projects chasing targets. Man is adaptable – we can survive without electricity, we cannot live without water. To paraphrase from policy 8 “the right RE in the right place”

Neither does policy 8 get a grip on reality; our biodiversity is dying from intensive agricultural pollution. The proposed farm subsidy scheme is no guarantee it will improve pollution such as ammonia, as entry is voluntary and so intensive agriculture could well choose to opt out. Agricultural pollution is an area that it is entirely possible to regulate and use of the planning system could help. I note the October 2019 CPO letter about biodiversity

but it does not address this pollution crisis. Besides, here in Powys where intensive poultry units are at the greatest density in Europe and show little sign of abating, planning officers consider a few trees labelled “enhancement” as fulfilling their EAW s6 duties.

I fully endorse the use of ecosystem services in urban/semi urban areas but feel that again the planning system could beef up this ambition. Where, for example, is the use of green roofs in buildings. If WG truly believes there is a climate emergency it will have to step up. A green roof may cost more at the outset but is insulating, good for invertebrates and helps with SUDS by retaining water.

Outside the planning system, but a necessary consideration, is maintenance of green infrastructure. As councils become more cash strapped we see less maintenance of parks, roads and paths. For instance, gutters filled with leaves have then blocked drain covers, leading to localised flooding.

The picture needs looking at in the round.

Policy 9:

I welcome the ambition of a National Forest but it is unclear what the NDF considers “woodland” or how they will link it with active travel routes, which may require landowner consent or change of status of PROW or Open Access.

Policies 10, 11, 13.

The RE policies and their spatial mapping emphasise the dangers of no overall strategy, (except for 70% of electricity consumption), and policy being developed in silos.

- There is no consideration of how the marine plan can cross cut to deliver targets despite the now adopted plan stating at 338: *Coherence across land-sea planning and consenting and with wider electricity cable considerations are important to ensure sufficient capacity to enable grid connection of new technologies.*
- There is no consideration of storage despite the preferred option stating: *PE1 Nationally important energy generation, **storage** and distribution infrastructure will be identified. Locations for new national scale renewable and low-carbon energy generation, **storage** and distribution infrastructure will be identified.*
- There is no consideration of the proposed replacement farm subsidy with its emphasis on ecosystem services and the need for participants to tie land to multiple year contracts.

Policy 10: This policy is not fit for purpose being evidenced with such poor research and error strewn documents that it cannot be considered sound and is therefore premature.

Below is a list of some of the problems with the evidence, or lack thereof.

- No mapped baseline of all RE, operational/in construction
- No baseline of renewable electricity capacity
- Failure to refer to the Marine Plan

Assessment of onshore wind and solar energy potential in Wales

Stage 1 - Development of Priority Areas for Wind and Solar Energy

- Map of existing wind/solar but not set against PAs for refinement
- No map of best solar aspect

Stage 2 - Refinement of Priority Areas for Wind and Solar Energy

- No cumulative landscape and visual impact assessment either with existing wind/solar or with targets used in Table E3
- Table 5 states *"Stage 1 Priority Area for Wind and Solar Energy 3 was split into two areas during the refinement, the southern-most part of the area became refined Priority Area for Wind and Solar Energy 15 with all other areas retaining their Stage 1 numbering."* It then fails to explain anything further about PA15.
- Table 5 states for PA8 *"It should be noted that Epynt Military Training Area is contained within this Priority Area for Wind and Solar Energy and that input from the Ministry of Defence is required to advise on the feasibility of renewable development in this area"*. Had Arup or WG bothered to look properly on the Powys CC website they would have found the SOCG between PCC and the MOD which amongst other things reads: *It was agreed to apply a 10km buffer around the boundary of SENTA with regards to wind turbine technologies based on the turbine parameters applied in the Welsh Govt Toolkit. Furthermore, Army representatives highlighted concerns with regards glare and reflection from solar PV installations in and around Sennybridge Training Area and the significant potential for adverse impacts upon military training. The discussions identified the need for an additional constraint to be applied with respect to solar PV technologies. As a consequence, it was agreed to apply a 3.5km buffer (the standard used on other protected landscapes) around the boundary of SENTA with regards to solar PV technologies.*
- C3 Summary of Sensitivity Assessments refers to superseded Powys REA and therefore fails to acknowledge the landscape sensitivity assessment for solar.
- Ignores LPA landscape assessments despite that being a requirement of REAs.
- Appx D centres of population legend gone completely awry with listed towns missing or moved and Swansea not included.
- Appx D map titled Open Access Land. Legend then refers to public land. Map is a

random mix of NRW estate, Open Access common land and statutory land, National Trust Land and Welsh Water Estate, etc. It is meaningless for its purpose as in the text at 4.2.3.

- Omits PA 15 from table at 4.2.3
- No explanation of targets or how MWh arrived at.

Regional and rural studies maps 07 Renewable Energy

It is unclear how or if these maps fed into the PARE because they use a completely different set of data, nevertheless they are also inaccurate.

These maps take their data from the REPD 1.4.2018 but are dated 20.2.2019. REPD is notoriously unreliable and it is perhaps predictable that it suits to underestimate the amount of existing RE.

- The maps incorrectly list Cefn Croes wind farm in south Wales.
- The maps omit the real site of Cefn Croes
- The maps omit Brechfa West commissioned June 2018
- The maps consider wind farms Brenig, (commissioned Jan 2019), Mynydd y Gwair (Feb 2019), Bryn Blaen (Feb 2018) and Clocaenog (under construction) as potential.
- Correctly show Powys Local Search Areas for solar yet in the PARE refer to the superseded REA.

Please also see HRA comments

Policy wording:

Policies 10, 11 and 13 are not only spatial but contain development management criteria. Policy wording has to stand up to testing in a court of law.

Firstly, I wonder if DNS projects that will fall under Sch 2 of EIA Regulations, and possibly HRA Regulations, can legally be given a presumption in favour of development. "Minimising" effects on designated sites may not equate to "no significant effects".

Secondly, the NDF states that it must be read alongside PPW. PPW 10 states at 5.9.17, "*In circumstances where protected landscape, biodiversity and historical designations and buildings are considered in the decision making process, **only the direct irreversible impacts** on statutorily protected sites and buildings and their settings (where appropriate) should be considered.*" This is unlawful policy as EIA and HRA Regs require likely significant effects of the direct effects **and any indirect, secondary, cumulative,** transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of

the development. It is also contrary to CADW's planning guidance.

Policy 11 and 13 negate the purpose of Policy 10 because they allow DNS anywhere within Wales which have *"no unacceptable adverse effects"*. This is allowing development, some the same as in PAs, a lesser hurdle with no justification within the evidence. What is "unacceptable"? A Planning Inspector has already tried to tackle this nebulous concept when making his report for Hendy Wind Farm. "Unacceptable" is extremely poor policy wording and should be worded "no significant". "Significant" has established parameters within EIA/HRA Regs and has been tested in the courts.

One can have no confidence in WG making unbiased judgements. Wales has already experienced Ministers overriding Planning Inspectors' well-argued RE decisions.

Local Democracy:

DNS projects have removed local decision making; now the NDF states that there will be a presumption in favour of DNS wind and solar within Priority Areas, a double whammy for everyone and everything effected. Policy 10 is the most shocking removal of local democracy. All the more ironic from a devolved government and shameful when compared to our English neighbours who are allowed to make **LOCAL** decisions about RE up to 50MW. Taking into account the Wellbeing of Future Generations Act what arrogance and folly of WG to deny Welsh residents their own decision-making powers.

Inconsistency:

It is unacceptable that Welsh Government and its advisors seem not to understand the difference in the terms "energy" and "electricity" or how the UK National Grid works. It is difficult to know whether this is lazy ignorance or wilful obfuscation to suit an end purpose. Whether deliberate or not, the Minister for Energy sends out mixed messages because of the way these words are interchanged. This is serious because it affects targets set by herself, with all the repercussions that entails.

The Senedd record shows that in 2017 Lesley Griffiths stated:

"Secondly, I am setting a target for 1 GW of renewable *electricity capacity* in Wales to be locally owned by 2030. In 2014, 330 MW of renewable *electricity capacity* in Wales was locally owned."

In accordance with that statement Energy Generation in Wales 2017, published December 2018, reads on page 7:

*"The Welsh Government has set a target for 1 GW of renewable *electricity capacity* to be locally owned by 2030."*

*"There is now 529 MW of locally owned renewable *electricity*,"*

*“There is also now 221 MW of renewable **heat capacity** that is locally owned,”*

*[Total = 750MW **energy capacity**]*

However, in the foreword to that edition the Minister states:

“We now have 750MW of renewable **energy capacity in local ownership, against our target of 1 GW by 2030.”**

Energy Generation in Wales 2018, published October 2019 the Minister again cites:

“We now have 778 MW of renewable **energy capacity in local ownership, against our target of 1 GW by 2030.”** However now the document itself, on page 12, refers to energy capacity: *“The Welsh Government has set a target that at least 1 GW of renewable **energy capacity** should be locally owned by 2030.”*

The NDF documents “Assessment of onshore wind and solar energy potential in Wales”, the Marine Plan and PPW 10, (5.7.16), use the original statement made in 2017: “one gigawatt of renewable **electricity capacity** in Wales to be locally owned by 2030;” **whereas** the NDF (page 36) reads, “one gigawatt of renewable **energy capacity** to be locally owned by 2030.”

I am sure the Welsh public would like Welsh Government to get a grip and provide clarity on what the locally owned target is, electricity or energy capacity.

This is just one example of the inconsistency within the documents that are used as evidence to support a policy that is little less than taking a wrecking ball to 20% of Wales critical natural resources that need to be protected for climate change adaptation.

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

Strategic Development Plans

The legislation, instead of simplifying the planning system, has made it ludicrously complex. I am struggling to understand the need for an NDF when there is already PPW which translates government policy into development management criteria. However, someone decided that regional planning would also be a good idea.

LPAs are already struggling with overloaded in trays, now they will be expected to defer to the NDF, PPW, Strategic Development Plans, Wellbeing Plans and Area Statements all singing to different tunes. This is overly complex and unsustainable.

LDPs must already consider neighbouring LPA plans, why do they need SDPs?

Mid and SW Wales

Mid and SW Wales is a huge area. It is hard to understand what makes WG believe that this area will work strategically, especially as their report commissioned in 2017 stated that Powys should be its own region. Mid Wales has no affinity with Swansea or the Pembrokeshire towns. Perhaps the wording "rural hinterland" was chosen deliberately? Hinterland meaning: *an area lying beyond what is visible or known*.

Mapping used in Stakeholder workshops do not show the layers in the consultation

documents, eg ALC mapping.

Some mapping is inaccurate, eg, environmental designations fails to show conservation areas in Powys.

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?

The HRA appx B is written to support the PARE. The mapping of buffer, is so cluttered it appears that it is designed to obfuscate. The final HRA needs much clearer and simplified plans. This chaotic mapping has led to the draughtsperson losing the plot. Elenydd Mallaen SPA has a 5km buffer when correctly it should have 20km. This error is highly likely to result in PA6 needing to be reconsidered.

I also question whether the HRA, albeit at a high level, can lawfully come to the opinion that there will be no significant effects on designated sites by relying on mitigation from individual planning applications.

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?

Don't treat the rural areas of Wales as a hinterland. They are distinctive areas within their own right and the urban centric policy making in the NDF does nothing for rural residents.

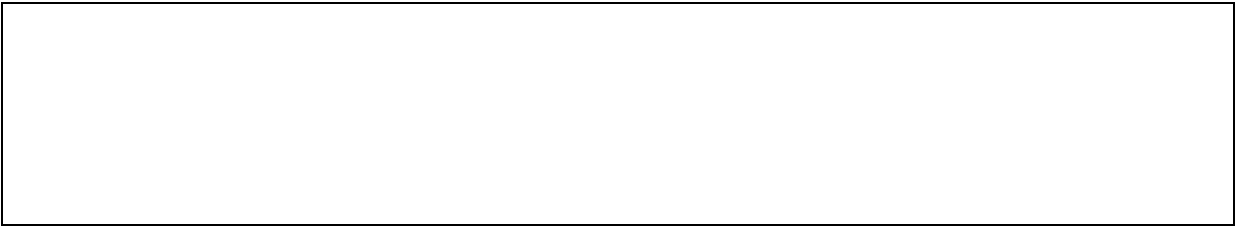
Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- 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?

In a video of a meeting between WG and Renewable UK discussing the NDF a member of the NDF team states that the draft NDF was signed off by the entire Welsh Cabinet. This is a shocking revelation. Our Ministers signed off a policy document without having proof read it themselves or had someone else do so? Arup's GIS evidence is of such poor quality that the dNDF is rendered premature because the true evidence base is missing. This has been a wicked waste of the public purse.



16. Are you...?

Providing your own personal response	<input 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"/>
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