

From: [Sue Dalton](#)
To: [NDE](#)
Subject: Response to the Draft National Development Framework
Date: 15 November 2019 14:06:15
Attachments: [draft-national-development-framework-response-form_Dalton and Thomas.doc](#)

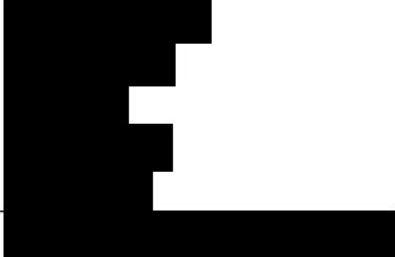
Dear Sir, Madam,

I enclose our response to the Draft National Development Framework,

Yours sincerely,

Susan J.Dalton and Ian D.Thomas

Consultation Response Form

Your name	Susan Dalton and Ian Thomas
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 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:

We do not think there should be any more onshore wind power in Wales. Wales is blessed with a 400 mile perimeter of coast and off-shore wind farms can be built on a larger scale, impact fewer people and have an added benefit of providing artificial 'reefs' for marine wildlife to colonise. Onshore wind impacts on local people and tourism and disturbs the peat layer which is a carbon sink. A better option is the restoration of natural woodland which would act as a carbon sink and ameliorate flooding risks in the lowlands as well as benefitting biodiversity and tourism.

In addition, Wales is a very beautiful country. The new plan is to encourage tourism in the Valleys with a Valleys Park, which is to be greatly welcomed, but for wind-farms to built in the mid-Wales Cambrian Mountains is counter-productive. If the Valleys are beautiful, surely the Cambrian Mountains are too and this area always should have been a National Park. It would have been, but for the short-sightedness of landowners at the time when National Parks were first designated.

If the Welsh government were to create a new Cambrian Mountains National Park, it would be a tremendous boost to mid-Wales and relieve some of the pressure on Snowdonia. To have four National Parks and with the Valleys park, five National Parks and the Clwydian Hills AONB stretching the entire length and breadth of Wales would be a tremendous vision for our country. It would be unique in the world and demonstrate that almost all of Wales is beautiful. If we Welsh don't believe that, how can we expect visitors to come and see for themselves.

The English government have extended the Yorkshire Dales and Lake District National Parks and at a stroke have improved the lives of the people who live in

those new areas. We see the new optimism and start up of businesses as a result. As keen hill walkers who trek all over the UK and abroad, we are frequently surprised how many of our fellow Brits know only northern England and Scotland as they think our only mountain is 'Snowdon'.

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 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 checked="" 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 checked="" 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?

The ultra low emission vehicle is the bicycle. The use of electric bikes is growing at a tremendous rate as it enfranchises groups who would never before have considered cycling. This makes providing safe cycling infrastructure a priority. We would have liked to have cycled to work for forty years, but considered the routeX to be too dangerous.

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 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 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?

We do not think there should be any more onshore wind power in Wales. Wales is blessed with a 400 mile perimeter of coast and off-shore wind farms can be built on a larger scale, impact fewer people and have an added benefit of providing artificial 'reefs' for marine wildlife to colonise. Onshore wind impacts on local people and tourism and disturbs the peat layer which is a carbon sink. A better option is the restoration of natural woodland which would act as a carbon sink and ameliorate flooding risks in the lowlands as well as benefitting biodiversity and tourism.

In addition, Wales is a very beautiful country. The new plan is to encourage tourism in the Valleys with a Valleys Park, which is to be greatly welcomed, but for wind-farms to built in the mid-Wales Cambrian Mountains is counter-productive. If the Valleys are beautiful, surely the Cambrian Mountains are too and this area always should have been a National Park. It would have been, but for the short-sightedness of landowners at the time when National Parks were first designated.

If the Welsh government were to create a new Cambrian Mountains National Park, it would be a tremendous boost to mid-Wales and relieve some of the pressure on Snowdonia. To have four National Parks and with the Valleys park, five National Parks and the Clwydian Hills AONB stretching the entire length and breadth of Wales would be a tremendous vision for our country. It would be unique in the world and demonstrate that almost all of Wales is beautiful. If we Welsh don't believe that, how can we expect visitors to come and see for themselves.

The English government have extended the Yorkshire Dales and Lake District National Parks and at a stroke have improved the lives of the people who live in those new areas. We see the new optimism and start up of businesses as a result. As keen hill walkers who trek all over the UK and abroad, we are frequently surprised how many of our fellow Brits know only northern England and Scotland as they think our only mountain is 'Snowdon'.

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 checked="" 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	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
----------------	-------	-------------------	----------	-------------------	-------------------	-------------------

[illegible]

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?

[illegible]

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?

[illegible]

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.

--	--

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?

Onshore wind farms have a detrimental impact on wild-life as a 'wild' area is industrialised.

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?

Living in Y Borth, (a coastal village in Mid Wales), we have seen first-hand the positive impact of the Wales Coast Path and we think that anything that encourages further walking and cycling can only have beneficial effects on tourism and health.

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"/>
--	--------------------------