

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?

Strongly disagree

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

Agree with some of them

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?

Neither agree nor disagree

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?

Agree

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?

Agree

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...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and solar developments					X		
District heat networks			X				

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?

1. Prioritise off-shore wind farms which are now acknowledged as the best alternative for the future and review possibilities for off-shore wind farms before committing to designating so many onshore locations
2. Do not designate so many areas at once but take a more considered and consultative approach - one area at a time
3. Do not over-ride the local planning process - once a landscape is ruined by building windfarms it is very rarely reversed because of the vested interests of those who invest in them
4. Give greater priority to reviewing and designating and protecting areas of landscape beauty before relaxing planning and accepting change of landuse/landscape.
5. In particular protect the Severn Valley landscape corridor - which in the current proposal has an area designated for wind and solar between Llanidloes and Newtown. The inclusion of such a sensitive area throws into question to reliability and rigour behind the choice of the areas designated for wind and solar development.
- . Take into account just how damaging to the landscape the wind farms are and for what a wide area of visibility they can be seen
7. Take into account the potential for tourism that a beautiful landscape has and the way in which this is lost through wind farm development. Wales has some of the most unspoilt landscape in the United Kingdom. In particular protect the River Severn Valley.
8. Protect upland areas which might be most profitable financially as locations for windfarms but which are also the most special and important landscapes and which define the character and culture of Wales and its appeal for local communities and tourism.
9. High altitude locations for windfarms are also the most visible from the National Parks which must be considered in the wider landscape context as most people are attracted to these for the unspoilt and expansive views of the surrounding landscape.

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.

No Response

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?

No Response

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?

No Response

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?

No Response

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.

No Response

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?

Yes, the report has concerns about the designation of wind and solar farm designated areas - and recommends a thorough process to review and assess any proposals. The report recommends that safeguarding processes are put in place to respond to these concerns. The implication is that there are not sufficient safeguards in place and that there are shortcomings in final proposals. It is essential that local consultation and necessary checks are put in place and that the designation of areas for windfarms and solar farms is not in any way a means by which any of existing checks or policies can be overridden or ignored.

P. 22 of the Habitat Regulations Assessment states:

However, it also clarified that this does not mean that all potential impacts have necessarily been avoided, since the buffer zones (shown on Figure 2 of the report) clearly illustrate that a significant proportion of the area prioritised for renewables development does still lie sufficiently close to Natura 2000/ Ramsar sites that impacts could occur. These buffer zones will be important for informing the scope of subsequent local plan-/ project-level HRA for future wind and solar farm proposals. The HRA Report finally concluded that, assuming that the Priority Areas map is first of all used to prioritise where future wind and solar development is focused, and that a further safety net would be provided by the local plan-/project-level HRA process (for all proposal sites located within the buffer zone of one or more Natura 2000/ Ramsar sites), this strategic approach to renewables development across Wales (as established by the NDF) would be compliant with the Habitats Regulations.

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?

No Response

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?

No Response

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 Peter Blee

Organisation (if applicable) -

Preferred contact details (email/phone/post)

[REDACTED]

☐ 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