


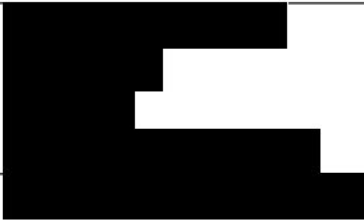
From: [REDACTED]
To: [NDE](#)
Subject: consultation on Draft national Development Framework
Date: 11 November 2019 17:14:03
Attachments: [draft-national-development-framework-response-form bec.doc](#)

Please find attached my response to the consultation on the Draft National Development Framework

Best regards,

[REDACTED]

Consultation Response Form

Your name	
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 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:

Some of the Outcomes are unrealistic and cannot be achieved by the proposals in this NDF. The "biodiverse... ecosystems" of No. 10 will not come about by covering the country in solar panels and wind turbines. This can only destroy the "vibrant rural places" of No. 2 and harm the "thriving Welsh Language" of No. 4 and the "prosperity, innovation and culture" of No.6. In fact, Outcome 9 as envisaged in the NDF is incompatible with all the other Outcomes.

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

We need to foster growth in Wales's huge rural hinterland, not continue with this urban-centric policy of funnelling all investment to the towns of South Wales. Huge areas of Powys, Ceredigion, Gwynedd and Carmarthenshire have no hospitals, public transport or public libraries.

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

Give local people a say in the siting of phone masts. This is too important to be left to telecoms companies who exist solely to make a profit, not consider the opinions of local users.

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?

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

Safeguarding biodiversity is essential. Safeguarding should be extended to protect our native species of plants and animals. We should plant more forests and eschew anything that increases rain runoff and hence flooding, kills birds and bats and destroys uplands i.e. on-shore wind turbines and solar panels.

The plan to develop tidal energy in Swansea Bay should be resurrected. We further need to investigate hydro-electric and off-shore wind schemes.

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

North Wales is a region. Mid and South Wales isn't. Why link Swansea and Llanelli with the vast open spaces of Powys or Pembrokeshire? They have nothing in common. We need a far fairer spread of investment, so that all the money isn't poured into the urban centres of South Wales. The Swansea Bay Metro is all well and good, but hundreds of villages in Powys have no buses at all!

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.

In pursuit of decarbonisation and renewable energy development it attaches insufficient weight to negative impacts on biodiversity, on the Welsh language, rural employment and culture. We need to consider alternative forms of renewable energy like tidal power, off shore wind and hydro-electricity.

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?

It seems to me that the HRA is inaccurate and far from complete. In the Rhiew Valley, part of the catchily named "Priority Area 5" where there would be a presumption in favour of windfarm development and an "acceptance of landscape change" lies Cwm y Wydden Nature Reserve, the only known Welsh site for the insect *Pseudopomyza atrimana*. Migrant birds like the Pied Flycatcher or Wood Warbler which frequent the site would be at risk from the blades, as would all the bats, Red Kites, Grey Heron, curlew etc. etc. This is just a snapshot of one tiny Welsh habitat. We need to protect biodiversity, not sacrifice it to ill-advised development based on inaccurate assessment. The natural world is too important to grant sweeping powers to an administration a hundred miles away in Cardiff while arrogantly discounting local knowledge.

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?

The proposals to cover a fifth of the country in wind and solar farms can only damage employment prospects, in tourism especially. Rural depopulation, which we spent the post-war years fighting, will accelerate. Welsh speakers and Welsh culture in the countryside will be disproportionately disadvantaged.

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.

Halt the drift to the urban areas by providing rural jobs and housing and recognising the significance of tourism to great swathes of Wales. Keep Welsh culture alive in our heartlands. Don't concrete over the countryside so that walkers, cyclists, campers, fishermen are repelled and take their money elsewhere.

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?

This Draft suggests a frightening assault on local democracy. Local input is absolutely essential if we are going to get it right. We cannot accept landscape change willy-nilly, nor give the green light to destroy all the jobs in tourism that are the lifeblood of rural areas: the guesthouses, campsites, pony trekking centres and village shops. There are great inaccuracies in the assessments presented in the

Draft. Just in Priority Area 5 alone, the blithe acceptance of significant landscape change would suggest siting wind turbines and solar panels down both sides of the Rhiew Valley. This seems to disregard their impact on landscape of historic and cultural significance. Tourism is key to our area both by virtue of its visual beauty and cultural worth. This is the parish where R.S.Thomas wrote his first three volumes of published poetry while Rector of Manafon and New Mills. The countryside around fed his verse. St. Michael's, is known as "The Church of the Poets" because of its links to Thomas, Walter Davies and William J. Morgan and attracts many visitors for this reason. Yet nowhere is this assessed as a landscape of historical or cultural significance. Indeed, If this Draft were implemented, it would potentially be possible to look through the church windows at a line of wind turbines.

I have no doubt that there are untold similar mistakes made in evaluating suitability for renewable energy siting all over Wales. We need proper local input and planning to counter these errors.

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	X <input type="checkbox"/>
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