

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?

Disagree

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

Agree with some of them

If you disagree with any of the 11 Outcomes, please tell us why:

As a resident of rural mid-Wales, my concerns are specifically with the impact of the NDF on the rural landscape. My first disagreement is that if a major aspect of the proposal is to cover vast swathes of rural Wales in industrial scale wind and solar farms, this environment will be a healthy place to live. Far from retaining the 'distinctiveness' of the rural regions/landscapes this will homogenize them. I do not see how industrializing the natural landscape on this scale is 'sustainably managing' natural resources, or, in the case of wind-farms, 'reducing pollution'. Noise is an increasingly recognised form of pollution, and having the misfortune of living 960 meters from a 17 turbine wind-farm, I have fourteen years experience of the stress-inducing noise emitted from an industrial scale wind-farm. I fail to see how industrialising the landscape on the proposed scale will do anything to create 'biodiverse, resilient, connected ecosystems'.

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...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)							X
Rural areas (Policy 4)		X					

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

I strongly agree that the future for rural areas should be planned and determined at the local and regional level.

This does not, however, appear to be what the NDF is proposing in its vision of 'large scale on-shore wind and solar energy development in these areas, and an acceptance of landscape change'. This is surely a top-down directive from the Welsh Government, the intent of which is to impose this industrialisation on the designated regions and areas without their consent.

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?

There should be strict limits to the extent that housing development can enlarge small villages and hamlets and expand into the countryside.

All new build developments should have to employ ecologically sound building methods and materials and be in harmony with their surroundings.

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?

Disagree

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

I am opposed to the obsession with spreading mobile phone coverage to every last mountain and valley in the country. There is a movement, particularly in emerging areas of the tourism sector, in favour of off-grid, dis-connected environments.

I also share a concern with many other people over the impact on our health of technological over-load and of mobile phone/phone mast technology in particular.

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?

Neither agree nor disagree

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?

'ultra-low emission vehicles' are still consuming electricity. Given this, the emphasis should be on increasing ultra-low emission public rather than private transport.

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?

Strongly agree

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?

For as long as governments focus on this absurd fantasy of 'economic growth', they will continue on the same old road to human and environmental destruction. We cannot keep 'growing', this is a finite planet. We have to stop this cancer of economic growth, abandon an economic system utterly reliant on consumption, 'green' or otherwise, and start down-scaling and appreciating the precious little we've left ourselves and other creatures of this ravaged earth.

As long as we pursue this insanity, when will more wind-farms and more solar farms ever be enough? Looking at the NDF's map of little less than the takeover of rural Wales, the future of this country looks bleak. This is Wales as a rural theme park; Snowdonia in the north, the Brecon Beacons to the south and the Pembrokeshire Coast National Park to the west. And the rest? One vast, homogenized wind/solar farm, fuelling the urban/consumer economy.

Take my region of Wales, that brown slab on the NDF map between Welshpool, Newtown and Llanidloes. The one and only asset this region has in abundance is its relatively un-spoiled countryside. Powys has in the past few years actively promoted a tourism initiative here. We ourselves are in the process of building a small, off-grid eco-holiday cabin on our ten acres, funded from our meagre savings. Tourists visit this part of Wales for the natural, peaceful, environment, and this proposal threatens to ride rough-shod over that. And please do not insult people's intelligence by claiming that wind-farms are tourist attractions.

You request alternative approaches to the NDF proposal. Short of re-imagining a truly alternative model to the profit driven growth model, how about beginning by installing solar panels on every roof-top in Wales. As for wind-power, the planning and decision making on this should be devolved to local councils working with local residents to the end of small developments powering the particular locality first and foremost. For urbanized areas, site them in locations already ruined by your favoured growth model; the edges of motorways, industrial parks, the perimeters of large cities. Just leave our precious, fast disappearing countryside alone.

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.

Strongly agree

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 opinion

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?

Strongly disagree

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?

Disagree

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.

I disagree with the proposal regarding the 'growth and development' of Cardiff airport; or any other airport.

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.

Point 2 of the ISA appraisal states the objective 'To contribute to an improvement in physical, mental and social health and well-being for all...'. .

I'm entirely in agreement with this statement, but the threat posed to the natural environment by large scale wind and solar energy farms (together with the expansion of cities and towns) goes against this objective. Human beings need access to environments free of man-made interference.

Note that a survey undertaken by the University of Leicester in recent years found that between 2006-2012, 22,000 hectares of green space was converted to 'artificial surfaces'.

With reference to wind-farms in particular, in view of my own experience of living for the last 14 years under 1 kilometer from a wind-farm, the effect the noise from this development has had on my mental well-being has been extremely detrimental. The World Health Organisation has just released a survey of the detrimental effects of noise pollution in the modern world (wind-farm noise was included in the survey). This kind of mechanical noise in an environment (such as ours once was) entirely free of man-made noise is extremely distressing and debilitating. The spread of thousands more of these noisy machine simply fills me with horror.

Point 15 of the ISA also states 'To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes'.

This simply will not happen if large swathes of rural Wales are viewed as locations on a map for wind turbines and solar panels.

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?

Given that human impact on the natural world is driving species after species of animal, bird and insect to extinction, and that according to the State of Nature Report from 2016, the UK is now one of the 'most nature-depleted countries in the world', these proposals should be subject to the most stringent legislation possible.

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 opinion.

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?

It is utterly unacceptable that major decisions concerning the natural landscape, and about the places we live and love and have strong ties and attachments to, should be made by Welsh Government ministers for whom these places appear little more than names on a map.

The loss on this scale of natural environment in the interests of 'business as usual' is utterly unacceptable.

If we are to limit some of the damage we are wreaking on the environment, for both humans and non-humans, the solutions have to be local, site specific, and non-market oriented . Big business and big landowners driven principally by profit rather than environmental concerns will not solve the problems they themselves have created.

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 Loraine Morley

Organisation (if applicable)

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Preferred contact details (email/phone/post)

[REDACTED]

Q26. 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