

# 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?

Neither agree nor 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:**

It seems to me that there will be gainers and losers and inevitably those with the lowest stake will lose the most. Big business stands to make the most and as such they will promote the most profitable options which might make sense on paper but which will not necessarily have the best balanced payoff in the long term.

## 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:

*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?

Agree

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?

Disagree

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

The best way to encourage mobile coverage is to require that all providers allow intercompany roaming meaning that duplication and triplication of coverage is eliminated. Wales is an area of hills and valleys and mobile signal travels in relatively straight lines so cover will always be difficult but by mandating sharing of cover the economic impact (and visual impact) should be MUCH lower. Welsh Government should lead in breaking up the ridiculous competition for coverage.

#### 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?

Electric vehicles are excellent for urban areas where pollution is most concentrated, They are much less appropriate and less necessary in rural areas, where efficient diesel or petrol is a better solution and will be for some time yet. Rural areas tend to be at a major disadvantage in access to public transport and so forcing expensive electric vehicles on this part of the population is a bad move for the rural economy unless it is carefully supported.

#### 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?

The report draws attention to 3 major areas of population and as such it should concentrate on generating power in relative proximity to these areas. Unfortunately it is not possible to continue to offer blanket protection to National Parks and AONBs with a clear conscience.

It is widely accepted that major industrial plants have a significant impact on the local populations. sometimes helpful in providing employment, sometimes deleterious in areas such as local pollution. Wind farms in particular offer a minute level of employment and a very significant and far reaching visual pollution impact.

The idea of encouraging local engagement/ownership should be pursued rigorously as should the opportunities for reusing brownfield sites and mandating solar or wind generation/storage in all new domestic and industrial builds.

The concept of virtual PPAs should be mandated for all major power developments enforcing a sliding scale of discount pricing dependant of proximity to the source. This would make developments more palatable and would help to offset the downsides.

I have a particular interest in areas 5 and 6 of the renewable development plan as Central Powys is a poor relation in the Welsh family. It has poor transport communications and a low population which makes it an easy target for developers. It also has very poor and already fully loaded grid connections.and has recently rejected a major grid connection as having too big a visual impact.

## 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 disagree

## 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?

Agree

## 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?

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?

Neither agree nor 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.

To lump mid wales with South-west Wales is preposterous. Swansea, Llanelli should be part of south Wales and Mid Wales should be properly recognised for what it is. A largely rural and Agricultural area that needs special consideration for its requirements that are UTTERLY unlike those of densely populated areas in the North and South.  
It does however provide a vital and relaxing recreational opportunity which will bring much needed income to the area and as such should be considered with great care where energy developments are concerned, particularly wind turbines.

## 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.

I feel that including the Welsh Language as a target is wrong. Simply the cost of supporting a bilingual economy is something that is not acceptable to tax payers any longer. It also severely limits the opportunities for organisations, particularly Public sector to recruit sufficient staff to operate efficiently. There is no mention of reducing consumption as part of the greener future, only that of generating more energy. A KEY step towards sustainability is reduction of demand.  
The only mention of population is the growth of the older sector and growing major population sectors. Wales should have a population growth policy. The world's problems today are largely those of overpopulation.

### 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?

Conservation of habitat is important. The establishment of a national Forest is a good move and maybe that would be more appropriate for Mid Wales than yet more wind power.

### 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?

The cost of supporting a bilingual state is a significant burden to business and taxpayer alike. It should be a personal choice and not a state policy

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.

Already Welsh language schools get a higher per head allowance for pupils than English language pupils. This is unacceptable in a country that should be promoting equal opportunity for all. Like all subsidies the sustainability of the cost should be VERY clearly communicated and the population should be allowed to vote. We are seeing the result of hiding the true cost of Brexit across Wales and the rest of the UK and one day the cost of the Welsh language support will come in for similar scrutiny and disruption. Why not use the money spent here on more important tasks?

### 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?

The energy generation section makes no provision for sea current or wave power. It offers little guidance on off-shore wind power despite indication the the wind opportunity on land in the far south-west is very high.

It dismisses nuclear power in a sentence. The issues with Nuclear power are largely those of hugely expensive one-off designs. There are factories building smaller scale Nuclear units repeatably and this would seem a much better option and well worth consideration, particularly for a country with a relatively small and dispersed population. I say this because the push to use more electric vehicles will increase demand for electricity and already most eco power has to be backed up by conventional power and that is by our common definition not clean and not ecofriendly. Talk to Rolls Royce and others about this opportunity.

Lastly the ARUP report on power highlights amongst other points these for consideration when developing renewable sites.

- Landscape and visual assessment
- Centres of population
- Vehicular access

Identified areas 5 and 6 have a great landscape value that is enormously appreciated by its visitors turbines with a 24

km radius of view do not improve the landscape. The area has a very low population density so does not need a lot more power generation. The road infrastructure is poor which means that any development has an unreasonable effect on the local residents.

## 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** Tim Ware

**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*