

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:

I disagree strongly with your proposals for on shore wind energy, particularly as it is offered with absolutely no analysis of any alternative options. This draft plan is seriously lacking in any serious analytical effort. I would be embarrassed to produce a report with so little argument and analytical data.

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 cannot find anything entitled 'spatial strategy'. I think this consultation document is designed to be difficult to follow. However I have read the parts dealing with proposals for on shore wind energy in rural areas and I disagree with them strongly. They lack so much context, evidence and statistical analysis. Where are the alternative options? There is absolutely no consideration given to the impact on the communities which will be subjected to large scale windfarms and the associated pylons necessary to carry electricity. The proposals make a mockery of the plans attempts to argue that it wants to protect habitat diversity. It almost seems as if each section has been written by a different specialist but no joined up thinking has been applied when pulling the whole together.

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?

Neither agree nor disagree

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?

I would love to comment on this but the Transport Policy part of the plan was all in Welsh with no obvious English version.

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?

Neither agree nor disagree

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?

Tehre was no oppoportuntiy to comment on the previous question. I strongly beleive in habitat diversity. I jut don't think this plan will deliveyr it.

Wales has already built a significant number of off shore wind farms. Everything I read tells me that off shore wind farms are more cost efficient than on shore wind farms. So rather than blight Wales' beautiful countryside with extrememly ugly and intrusive windfarms, why not expand the off shore capacity? The views out to sea along most of the Welsh cosast have already been ruined, so they cannot be ruined more by yet more windfarms. However the countryside in Wales would be severely impacated by the proposed scale on on shore windfarm develevopment. It would cause habitat descruction; it would devesate landscapes and have a hauge impact on the tourist industry of many areas. Farmers have been encouraged to diversity into tourism and the Welsh government now seem determined to waste the opportunity that they have created. There is also another very effective alternative which could be promoted for local community use. Wales has a lot of water. Hydro electricity should be used much more. Please have a look at this link: <https://youtu.be/XiefORPam>. It provides a methodolgy for local hydro electricity linked to rivers or canals.

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.

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?

Neither agree nor disagree

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?

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.

I do agree with a lot of what is in your regional plans. However I fail to see the logic of linking the Swansea area with the rest of mid and West Wales. Swansea surely is more logically linked with Cardiff and Newport?? The M4 provides an artery linking them. I also, as I have said before, strongly disagree with your approach to on shore windfarms.

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.

Your consultation has been inadequate. The rural proposals, aside from the wind and solar, are so general that they are almost not worth the mention. What is clear from your proposals that local people will have no say. Local democracy is being taken away by the plan as it removes local decision making. The Welsh Government is giving itself the sole right to blight communities and landscapes, without taking any account of how its plans will impact local people, businesses and wildlife. Where are your comparison considerations? You don't even mention off shore wind as a possible option. How can a consultation be valid if it fails to consider viable options but rather simply pushes a predetermined proposal? This consultation should have involved a full analysis of all options with costs and impacts clearly quantified.

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?

I was unable to find the Habitat Regulations Assessment Report. Your whole plan is far more likely to put species at risk because of habitat destruction in rural areas. The world already has substantial biodiversity decline. Your plans offer nothing to reverse Welsh biodiversity decline. Vague commitments to do things which are not quantifiable are not worth the paper they are written on.

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?

Please produce an evidence based plan, not simply a wish list written by people in Cardiff.
Please pull together an effective analysis of Welsh requirements for renewable energy and relate this to volumetrics about all potential sources of energy - ie off shore wind, hydro, tidal etc.
Use someone other than ARUP to provide the supporting information as they seem mainly aimed at supporting a pre-determined decision with minimal effort, given the poverty and inaccuracy of their data.
Please reinstate local decision making in relation to all aspects of the plan which impact local communities.

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 Jeanne Spinks

Organisation (if applicable) -

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