

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?

Agree

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

Agree with most of them

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

11. in places which are decarbonised. is too vague to be a guide to policies

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?

No Response

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?

No Response

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?

No Response

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?

This policy is no substitute for improving public transport. That appears to have been overlooked.

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?

Grants to improve house insulation. Higher insulation standards for new builds. Grants for more efficient home heating. Better low carbon public transport. Stop wasting money on Cardiff Airport.

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?

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?

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?

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.

You have just drawn lines on the map for your administrative convenience. Mid-Wales has no geographical, cultural or economic commonalities with other parts of the so-called region. We are many hours away from Swansea, the Haven, Pembrokeshire by road, and public transport links are virtually non-existent. In short it makes no sense for Mid-Wales and the borders to be lumped together in this so-called region.

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.

This document is 350 pages of waffle. I can't be expected to plough through it. Wishing well-being on the citizen while starving communities of sufficient money for library buildings, decent community facilities, salt on the roads etc. etc. is a joke. We want practical help, not waffle.

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?

No Response

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.

The voluntary sector relies on retired and semi-retired people. These people should not be disincentivised from volunteering by onerous requirements for parallel use of Welsh language where not a necessity. By all means offer free courses to people of all ages to learn Welsh, but don't make lack of Welsh a barrier to participating in society and culture in Wales.

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?

Consultation not genuinely engaged by government

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The government has made it very difficult for anyone, even a full-time expert to navigate all the documents. The documents themselves have not been proofread. The consultants were paid to produce accurate documents. They failed. The government has a responsibility to get value for money by checking what was delivered was of the required standard. They failed. They were alerted to the shoddy state of the documents back in September and promised to update them. They failed. I have alerted the media to this incompetence.

The mapping data has been hidden behind Arup proprietary tools. When the contract was issued it should have been stipulated that all maps be freely available to download in open data exchange formats. This would enable proper scrutiny by Universities, interest groups, and members of the public. Meaningful scrutiny of the data requires it to be overlaid with other relevant data, such as SSSI boundaries, European protected habitats, rare ecosystems, migratory bird resting points, rights-of-way, historic sites and so on. Arup have not even managed to overlay it correctly with the location of my home town of Llanidloes. To hide the data behind the consultants' tools ties the government into paying over yet more to Arup in the future and prevents proper scrutiny.

Welsh Government definition of Mid and South West Wales region is unhelpful

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How can data aggregated across such a diverse areas assist decision making? Powys is one of the least densely populated areas in the UK, Swansea one of the most urban. How can any planning official appointed to work in the area hope to get to know it when it would take around five hours to traverse end to end on the very poor road network.

Lack of respect for local democracy

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The policy that any generating plant > 10MW capacity would be outside of local planning scrutiny is outrageous. It contrasts with what happens over the border in England. Devolution should bring decision making closer to the people not further away. This obsession with central planning is reminiscent of the old communist regimes in Eastern Europe.

Lack of respect for landscape

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Elsewhere in the development plan lip service is paid to landscape. However in the renewable energy plan this is turned on its head. Any land not designated as National Park or AONB is regarded as fair game. To add insult to injury, some parts of Powys have been spared purely because they are visible from the Shropshire Hill AONB over the border. The Welsh Assembly since devolution has had the power to designate AONBs but they have sat on their hands and added no protection for the Cambrian Mountains or any other part of mid-Wales. The legacy of Wynford Thomas is in danger of being forgotten and lost.

No Confidence in Fair Implementation

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The government has already shown contempt for the consultation by not correcting the faulty documents, and by accepting the shoddy and lazy methodologies followed by Arup. They have failed to follow their own policies and national and European laws in the designation of priority areas. They are already failing to enforce planning decisions, caving in to the Hendy Wind Farm developers at every turn.

Conclusion

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Citizens of rural Wales can have no confidence in the government's current actions or future plans with regard to renewable energy. The consultation should be halted as it is not fit for purpose. By continuing with it, they will invite judicial review.

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 Adrian Thoms

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