

# 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 all of them

## 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:

'Priority should be given to economic activities with strong links to rural areas, including food and drink processing, energy generation, tourism and leisure, the environmental economy and businesses ancillary to farming, forestry and other rural economic activities.'  
There is a false assumption that energy generation is strongly and necessarily linked to rural areas. Urban areas and landscapes are equally or more appropriate.  
Solar panels could be installed on all new housing and on all commercial buildings in urban areas which are the areas consuming the power.  
Rural areas could be preserved to focus on the areas to which they are exclusively suited. eg farming and tourism.

## 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?

No opinion

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 opinion

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?

*No Response*

#### **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 opinion

#### **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?

#### RENEWABLE ENERGY.

Our electricity is generated by a private wind turbine. I fully support the generation of renewable energy, but it does not need to be achieved at any price. Several issues arise from the NDF:

##### 1) Democracy and accountability.

There is very limited opportunity for local democracy and debate. The renewable energy policy will be implemented from the top down by central government which has acquired far reaching and undemocratic powers under the Planning (Wales) Act 2015.

In England, local councils can make decisions about wind farm proposals and need the support of the local community. Why does Wales lack this local democracy?

The decisions to designate priority areas and to accept landscape change are undemocratic, unacceptable, unjustified and a betrayal of public trust. This is not a price worth paying.

##### 2) Public debate

Is the population of Wales happy for the country's historic and stunning landscape to be sacrificed to the political ambitions of the current government?

Why were AM's not permitted time to scrutinise these proposals before the draft publication?

Why was a request for further public drop in sessions in Montgomeryshire rejected?

Are the views of smaller rural populations less worthy of attention than those of Government Policy makers?

Where does accountability lie?

In England, local councils can make decisions about wind farm proposals and need the support of the local community. Why does Wales not have such local democracy?

##### 3) Inconsistencies

Policy 26 states that: 'Mid and South West Wales has outstanding natural resources', ..... 'and a high quality landscape. Development plans should provide a framework for their management and enhancement, enabling them to be enjoyed by future generations and to provide economic benefits for the region's communities.'

How is this achieved when there is an admission that landscape change is acceptable?

##### 4) Information:

-The maps showing the wind and solar priority areas are very poor and unhelpful.

- There is no indication of what % of electricity is currently renewable or what renewables will be included in the 70% target.

##### 4) Tourism and recreation:

The landscape of Powys and mid Wales should be safeguarded for residents and for the local economy which relies increasingly on tourism. It is the role of Government to support and protect these remote and rural landscapes for the nation.

The policy of ring fencing national parks and removing the constraints on development in other rural areas, sends a strong message that the environment in which most of us live is not important and that only National Parks count.

Referring to the tourism industry 'It is important the region's distinctive heritage is preserved and enhanced by high quality development.'

6) Offshore Wind Turbines

Current thinking is that offshore wind is the favourable option. Why is this not mentioned?

7) Legislation could be introduced to require that solar panels be installed on all new and existing industrial and retail properties over a certain size as well as new homes (114,00 are needed across Wales according to the NDF) .

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Large scale developments classed as of 'National Significance' will be decided by the Welsh government. In fact, since the decisions involved here are of national significance involving extensive landscape change the nation should be consulted at all levels.

This is the government trampling over democracy and dressing it up as a green agenda.

We need the right renewables in the right place.

## 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.

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?

Strongly 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?

Strongly 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.

These regions are large and diverse. Decisions should in many cases be made with local participation. Swansea and rural mid Wales have different priorities and perspectives. A large windfarm or solar development in rural Powys will go unnoticed in Swansea (or Cardiff) -See below.

CARDIFF AIRPORT

Growth and development of Cardiff airport is in contradiction to the decarbonising and sustainable objectives outlined in this document.

Is the Welsh Government seeking economic growth at any price? i.e. the expansion of the airport is offset by solar and wind installations elsewhere in rural Wales.

## 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.

*No Response*

## 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.

*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?

NATIONAL FOREST

The document does not give detail on this scheme.

How will it be funded, the types of trees, criteria for planting, planning regulations,(in the light of the irreversible landscape change) environmental costs and benefits, the potential loss of biodiversity.....etc....

The issues are many and complex and are not mentioned.

## 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**

Catharine Wilson

**Organisation (if applicable)**

Mrs

**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*