

## Consultation Response Form

Your name	Professor Vincent Goodstadt
Your address	19 Orchard Close Eynsham Oxfordshire OX29 4EZ
Preferred contact details (email/phone/post)	UK2070commission@btinternet.com
Organisation (if applicable)	UK2070 Commission

## 1. NDF Outcomes (chapter 3)

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?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
		X			<input type="checkbox"/>	<input type="checkbox"/>

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

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
X				<input type="checkbox"/>	<input type="checkbox"/>

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

All these goals are highly desirable. The challenge is that they are expressed as outcomes but without specific metrics (except in a few cases) by which one will be confident that they have been achieved.

It is not clear whether the overall outcome desired would result in Wales still having the same relative position in the UK economy or make a greater contribution and help tackle the deep-rooted spatial imbalances in the UK which affect Wales as much as any part of the UK

## 2. Spatial Strategy (policies 1 - 4)

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	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)						<input type="checkbox"/>	X
Rural areas (Policy 4)						<input type="checkbox"/>	X

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

No opinion is given on the specific components of spatial strategy since this would be inappropriate given the UK2070 Commission's remit. Dependent on clarification of the extent to which the rebalancing of the UK economy that is needed (see the UK2070 Commission's two reports <http://uk2070.org.uk/> ) is accepted as part of the future for Wales, then the spatial strategy might need to anticipate a higher level of growth for Wales, than trend based assumptions would require.

The UK2070 Commission has had explicit regard to the pioneering approach of the Welsh Government to developing policies for promoting the foundational economy. It is not clear as the extent to which this has been built into the spatial strategy.

On an additional point, the draft NDF rightly highlights the need for it to have regard to the challenge of climate change. The emphasis in the document is mostly on addressing the threats that it poses for Wales. The UK2070 Commission, in its own thinking , has done likewise but has also stressed the point that the shift to a zero-carbon economy will also create new opportunities in the new economy that will be required to service Wales and the UK (e.g. not just in energy production but also the manufacturing based required to service it)

### 3. Affordable Housing (policy 5)

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?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

See above : it is however recognised that the issue of affordable housing is a key issue

### 4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

The UK2070 Commission has recognised that the roll out of mobile coverage is potentially compounding the patterns of inequality in the UK , especially in remoter and rural areas. In its second report it placed this as a priority for action. Therefore without commenting on the detail in the NDF, the principle behind it is supported

## 5. Low Emission Vehicles (policy 7)

- 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?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
X					<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

The UK2070 Commission accepts the critical need to address climate change (see earlier comment 2). The specific raft of policies to do so need to be tailored to local circumstances to ensure a just transition that helps to address inequalities and not reinforce them. The transition to electric vehicles needs to have regard to this and also to the need to put even greater emphasis on public transport (see second report of Uk2070 Commission)

## 6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
					<input type="checkbox"/>	X

The UK2070 Commission accepts the need to support ecosystem services but does not comment on the detail.  
It is however noted that the level of spatial analysis that has been applied to renewable energy (and the associated policy map) could also be applied to forestry (as was done in the past in the work in Scotland and by others on a indicative forestry and woodland framework),  
The Uk2070 Commission has also highlighted the value of integrate the rural and urban green infrastructure agenda (e.g. through the promotion of National Urban Parks

## 7. Renewable Energy and District Heat Networks (policies 10-15)

- 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	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments							X
District heat networks							X

- 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?

See above

## 8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
X					<input type="checkbox"/>	<input type="checkbox"/>



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.

The UK2070 Commission has highlighted the need for national Policy frameworks to be underpinned by clear sub-national strategic policies which allow local interpretation of more general national policy goals, deal with issues that are wider interdependencies that can be dealt with by individual and need a collaborative and agreed approach. The UK2070 Commission however does not wish to comment on the detailed specifics for the subregions. It therefore makes no comment below on the following questions

## 9. North Wales (policies 17-22)

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 agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
					<input type="checkbox"/>	X

## 10. Mid and South West Wales (policies 23-26)

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 agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
					<input type="checkbox"/>	X

## 11. South East Wales (policies 27-33)

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 agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

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.

## 12. Integrated Sustainability Appraisal

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 COMMENT ON THIS QUESTION**

## 13. Habitats Regulations Assessment

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 COMMENT ON THIS QUESTION**

#### **14. Welsh Language**

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 COMMENT ON THIS QUESTION**

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. 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

- II. 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 COMMENT ON THIS QUESTION**

### 15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

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### 16. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	X

<b>Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here</b>	<input type="checkbox"/>
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