

Consultation Response Form

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<u>Organisation (if applicable)</u>	<u>Planning Aid Wales</u>

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>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<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>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

It is difficult to disagree with the outcomes, but they would benefit from being clearer, more spatial and more specific so that progress towards them can be measured. There may be difficulties with some outcomes conflicting or pulling in different directions, particularly in the context of limited resources. The number of outcomes would benefit from being reduced or at least being expressed in priority order.

A greater understanding of the steps required to achieve the outcomes is essential; a framework explaining how, where and when they will be delivered is needed (e.g. (national forest, rapid charging points network, mobile action zones). More detail on how, when and where national level infrastructure will be delivered is particularly important.

In several areas the NDF would benefit from greater geographic specificity. Hatched areas indicating green belts and arrows indicating connectivity would at the least benefit from labels to provide clarity to the communities potentially affected by them. The vision would benefit from being more distinctive and recognise the need to provide

an inclusive framework that considers the needs of local communities and all groups within Welsh Society. This should encourage more meaningful participation by community groups in the next iteration.

More definitive statements on how Wales intends to address the climate emergency would be beneficial.

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"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Concentrating larger scale development within areas more able to accommodate them is sensible, but more details and locations are needed. Communities are increasingly concerned that infrastructure (roads, drainage, water supply) is not delivered in pace with development. The NDF should set a framework to address infrastructure before or at the time larger scale developments come forward.

Water resource planning should be referenced in the NDF to ensure water management can keep pace with development.

Many objectives will need cooperation and investment; support to reduce private travel will need investment in public transport and provision of universal, safe active travel options. It should be recognised that remote rural areas with little or no public transport would deem car usage essential; such a transport policy could lead to further development restrictions for rural areas and conflict with other objectives. Very little detail is provided on the need to reduce congestion, particularly on the M4.

Development needs and constraints need to be met in rural areas; more positive statements about small scale development, farm diversification and appropriate mixes of development would be beneficial. Modern and flexible approaches to rural diversification for a range of uses (agri-food, events, retail & catering,

accommodation etc.) should be supported, particularly given the unknown impact to farming and the rural communities for other matters such as Brexit.

Finally, and of great importance is for any framework to recognise the importance of proper and meaningful engagement with communities, urban and rural.

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 checked="" type="checkbox"/>	<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 approach the delivery of affordable housing?

The delivery of genuinely affordable housing is seen as critical by local communities in many areas. Any proposals deliver more affordable housing is to be welcomed. It is noted that the detail of this delivery will be dependent upon local authorities and housing associations. Such provision should be based on clear evidence of particular local needs. Greater encouragement and resourcing to deliver would be welcome.

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>
<input type="checkbox"/>	<input checked="" 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?

Good and easily accessible networks are vital for communities' personal and business needs. Communications access across the whole of Wales should be improved but more specific geographic areas for improvement should be identified. Any provision should ensure proper regard is given to public health, residential amenity and impact on heritage.

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>
<input type="checkbox"/>	<input checked="" 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 enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

The provision of charging equipment to encourage use of low emission vehicles should be welcomed, but more detail as to the locations, or at least priority corridors for a proposed network should be provided. It is recognised that this alone will not address this issue and encouraging uptake and change in vehicle use will be dependent on matters outside the planning system such as fiscal matters.

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

More detail / maps on specific priority areas for green infrastructure should be provided.

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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 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?

Wind developments can be an emotive issue in communities; therefore, it is important that appropriate mechanisms are in place to ensure engagement in order to ensure the impacts of noise etc. is publicly considered. There is a strong focus on onshore wind energy production within the NDF; perhaps offshore wind energy production should be further referenced. More specificity on preferred models for District Heat Networks may be beneficial; this policy might sit better in PPW.

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>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<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.

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"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

Local communities must be able to recognise these areas and fully engage with SDP preparation. The Mid and South West zone covers an enormous geographic area that does not benefit from strong connectivity and has distinctive communities that might not recognise or have a sense of ownership over the area. Communities need to understand the purpose and scope of SDPs and be engaged as early as possible. Overlaps in timing / weight of SDPs and LDPs needs to be clarified.

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.

At 350 pages, Planning Aid Wales would question the accessibility of this document for members of the public, albeit, the provision of the provision of a non-technical summary is welcomed.

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?

None.

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?

Welsh language is referenced lightly and with no clear methodology as to how planning can facilitate its growth or prevent its decline; land values and the lack of affordable homes in rural areas, the rise of second homes and AirBnBs are significant challenges faced by some Welsh communities which could be better addressed. As a defined outcome more action should be identified within the document to protect and enhance this vital element of Welsh culture.

There is only reference to the number of Welsh speakers on the North Wales map (p.48); such references should be included in the maps for all three regions (p.55&61).

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.

See above.

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?

1.It would be helpful if the final NDF could include some more detail on boundaries/locations of nationally significant infrastructure and, if possible, how WG intends to secure:

- (a) infrastructure of all types in advance of development,
- (b) delivery of more affordable homes of all tenures,

- (c) family farms with mixed arable, dairying and stock
- (d) reduced pressure on greenfield land to improve food security and increase the amount of brownfield land reclaimed, and
- (e) reduced pressure on conservation areas, SSSIs and habitats for protected species.

2. Welshpool Mid Wales Airport and Anglesey Airport are not shown on the spatial strategy map.

3. The NDF could provide more detail on the role and benefit of Place Plans which would allow people to shape their communities and engage within the planning system. This would have benefits in delivering the vision and 11 objectives of the NDF.

4. Planning Aid Wales questions whether utilising drop-in sessions with scheduled appointments as a primary opportunity for community engagement in the NDF is appropriate. It is possible that members of the public wishing to learn more and discuss the NDF may have been put off by having to arrange a sit down meeting with Welsh Government officers. A broader range of engagement approaches (e.g. public meetings, display boards and social media campaigns) may have yielded more involvement and response, particularly from harder to reach groups. A young person's version of the document is welcomed and it will be of interest to see if any young people will respond to the draft; dedicated youth engagement events might further opportunities to raise awareness and elicit responses in future.

5. Several of the questions posed on this form are restrictive (e.g. 'If you disagree' is used as a precursor to the comments boxes; this might be off-putting for those in agreement but wish to comment). Opportunity to comment more generally on sections of the NDF would be beneficial for communities.

6. It is recognised on page 9 that the 11 Outcomes combine to form the vision; it would be beneficial if page 18 made more explicit reference to this or had a title of 'NDF Vision & Outcomes'.

Are you...?

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

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	<input type="checkbox"/>
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