

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?

No Response

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

No Response

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?

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 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...

No Response

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?

No Response

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.

No Response

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?

No Response

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.

No Response

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?

NDF Consultation – Response from the Future Generations Commissioner for Wales, Sophie Howe

My response to this consultation constitutes advice issued under my section 19(1)(a) power.

I would like to thank the Welsh Government's planning team for having sought the advice of my office from the start of the preparation of the first draft National Development Framework for Wales.

I am pleased that the team have, in particular, followed our advice on involvement and have engaged more widely and differently from what they would have done prior to the coming into force of the Well-being of Future Generations Act.

You will be aware that I have already advised that you need to consider future trends and scenarios in the development of this plan. As well as the issues around carbon emissions and biodiversity I have raised below, this is also clearly crucial in terms of how the NDF will support the delivery of the infrastructure required particularly in terms of connectivity and the changes in how we will live and work as a result of the fourth industrial revolution. I would like to understand how this has been considered in the framework.

Turning to the substance of the framework:

Consideration of the well-being of communities

Subject to my main concern explained in the next paragraphs, I generally welcome the contents of the document and its references to communities well-being which follows my advice and I can recognise a real intent to embed the Well-being of Future Generations Act throughout the framework. Clearly the Government will need to demonstrate how these intentions are being implemented on the ground when the NDF is finalised as I am increasingly concerned that the aspirations set by Government are not being fully realised due to a lack of focus on supporting the change in culture needed and monitoring implementation

Climate emergency, biodiversity and carbon targets

The work on the NDF started prior to the declaration of Climate Emergency and I would like to understand precisely how the NDF contents are to be amended to reflect this very important development.

In the same line, I would also like the Government to explain how the proposed NDF and maps have been assessed in line with the delivery of the national carbon reduction targets. I would like to see a robust analysis of how the NDF can help deliver the national carbon targets and how the framework seeks to carefully avoid increasing carbon emissions. While I was pleased that, following on my advice, there are commitments to 'low emission' transportation, 'low carbon' heat and energy generation throughout the document I fear this won't compensate for the proposed increase of high carbon emission projects (ports, airport, etc.) encouraged by the framework.

This is particularly based on the fact that while some parts of the document encourage the right behaviours (renewables, cycling path, green belts, mixed use developments, mixed tenures, low carbon energy, low emission transport etc.), these can be totally undone by other parts of the framework such as the push towards airport and port development.

The same point applies also in relation to the enhancement of biodiversity required in Wales by the Environment (Wales) Act. I would also like to see more clearly how the need for nature and biodiversity recovery has been taken into account and is delivered through the NDF, as well as how the Sustainable Management of Natural Resources principles have been applied (in addition to the sustainable development principle and ways of working in the well-being legislation) to the design of the NDF and in particular for design of the maps. I would therefore like to see another clear assessment of how the proposed NDF will help reverse the current biodiversity decline and I am not sure that the current propositions will be sufficient.

The proposed draft of the NDF does not yet reflect the Climate and Ecological Emergency Declaration which must be taken seriously and be implemented in this framework (as well as in all other government policies) and I would expect to see visible amendments to this framework following a review in the light of the declaration. Latest evidence suggests that the UK's share of the global carbon budget between 2010 and 2050 would need to be around 7,600 MtCO₂e in order to have an 80% change of avoiding an above 2 degrees global average temperature rise. The State of Nature Report 2019 reveals that of the 3902 species assessed in Wales 73 have been lost from Wales already with a further 666 species being threatened with extinction. The NDF must demonstrate clearly how the it will support the reverse of this decline.

Disconnect between the ambitions and objectives of the framework and the priority area maps

I would like to understand how the current maps would enable the delivery of the objectives of the NDF. For example, it is not clear that renewable onshore wind development on the size and scale consistent with the stated ambitions of Ministers will be possible because it is suggested that a significant part of the priority areas might not practically be suitable for sustainable wind farms. It has been brought to my attention, as another example, that the area around Newport has restrictions such as infrastructure and flooding zones which would render impossible the delivery of the development suggested in the proposed NDF.

It is clearly crucial that the NDF supports the shift to a low carbon society in terms of the 'words' of the

document but critically in terms of what flows in terms of 'action'. We must see a clear and detailed assessment of whether this framework will deliver decarbonisation targets in terms of the shift to renewable energy – the Zero Carbon Britain Report is due to publish models the actions that will need to be taken to achieve zero carbon and considers that a zero carbon Britain will need to onshore and offshore wind will need to meet around 50% of energy needs (accounting for action taken to reduce demand).

What assessment has been made as to how the framework will support practically both the long term environmental and economic benefits of off shore wind and solar energy required to meet decarbonisation targets in the Environment Act and beyond given more recent Ministerial commitments?

I would therefore like to see further and detailed analysis of the practical and more granular potential for each of the areas highlighted in the NDF to ensure that the overall ambitions of the Government as well as the proposed NDF objectives can be delivered by this NDF (integration) and to identify the areas which might need adjusting to ensure implementation in the short and longer term.

Updating of the TANs and Investment plan

The setting out of the first NDF is part of the general recast of the land use planning in Wales and I would like to know what the government's plan is for updating the Technical Advice Notes and the Investment Plan referred to at the beginning of the document in light of the new planning and climate change policies. These will also impact the good implementation of the NDF.

Transitional Period and Reliance on SDPs

A final point concerns the references in the proposed NDF to the Strategic Development Plans which will provide a lot of the details of the implementation of the NDF objectives and policies. I understand that only one SDP is currently in preparation and it might only be ready in 2025. This is of significant concern given the timescales for decarbonisation. This development framework is just the initial phase of the policy change process that would be required to meet targets and without comprehensive adoption and implementation at speed. I would therefore like to know what the transitional arrangements are for the 5 to 10 years ahead until we have SDPs in place but also what would be the provisions if no such plans were adopted in some places.

Conclusion

I am grateful for the opportunity the Welsh Government has given to my office to work with this them on this draft. They have taken in account most of my advice to date, but having seen the full proposed document, I am concerned that the proposed NDF won't sufficiently moving us towards a resilient and low carbon society at the pace and scale required to meet our duties around decarbonisation and the enhancement of our ecosystems which are needed to fight climate change and to meet the needs of future generations. I would like to see, to reassure me and to improve the framework, detailed analysis demonstrating that the NDF and in particular the design of the different areas will enable Wales to meet practically its sustainability ambitions and well-being goals.

16. Are you...?

Q24. Are you:

Submitting a response on behalf of an organisation

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	Sophie Howe
Organisation (if applicable)	Future Generations Commissioner for Wales
Preferred contact details (email/phone/post)	contactus@futuregenerations.wales

Q26. If you want to receive a receipt of your response, please provide an email address.
Email address

No Response

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response