

Consultation Response Form

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Your address	[REDACTED]
Preferred contact details (email/phone/post)	[REDACTED]
<u>Organisation (if applicable)</u>	<u>North Wales Area of the Ramblers Association/ Y</u> <u>Cerddwyr Ramblers Cymru</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?

[illegible]

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

[illegible]

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

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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 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 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:

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

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

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 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?

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?

[illegible]

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

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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?

[illegible]

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...

[illegible]

- 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?

We agree with these strategies but not the planning regulation behind it if it means there will not be consultation on proposed sites in the priority areas. See answer 15 We would also support tidal and some offshore wind development.

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?

[illegible]

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?

[illegible]

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.

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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.

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?

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?

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.

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?

North Wales Ramblers welcomes the National Development Framework as a positive approach to dealing with important issues on a national scale. In particular we welcome the aims of creating accessible healthy communities and protecting our environment including from climate change.

We would particularly like to emphasis our support for three of the 'Outcomes' on Page 20. Outcome 1 where it says 'Our cities, towns and villages will be physically and digitally well connected, offering good quality of life to their residents' ...with... accessible green and open spaces...'. Outcome 2 which shows a recognition that a balance is needed 'between development and

preserving the character of rural Wales, ensuring our small towns and villages have bright futures as attractive places to live and work.'

Also we particularly welcome the promotion of 'Active' travel as part of outcome 7. This theme is mentioned again on page 22 which states 'urban growth focus enables more people to walk and cycle for everyday journeys and, with good urban design, can create positive impacts on public health, air quality and well-being'.

We strongly believe there should be a greater recognition in the NDF of the role of our Public Rights of Way(PRoW) network which supports so many of the objectives (including mental and physical wellbeing, heritage, tourism and leisure).

North Wales Ramblers are concerned that to achieve 'accessible healthy communities' requires adequate funding for things such as maintaining, as well as improving, non-motorised travel infrastructure including our PRoW and in line with Welsh Governments Active Travel Act. This does not currently seem to be the situation. Here in North Wales we have had cuts in budgets and the loss of posts in a number of our local authority rights of way departments. We would seek reassurance that there will be funding to achieve and maintain the positive aims in this document.

Many housing and other developments can impact locally on footpaths and access needs but these would usually be local issues. We support using developments as an opportunity to improve walking infrastructure and access to the countryside.

You state that 'Growth and new development must be in the right place, undertaken in the right way and make efficient use of our resources to achieve the NDF Outcomes.' The siting of housing, energy and economic development must take account of the needs of the wider area and should not have a significant impact on the beauty of the countryside. Tourism is, as recognised in the document, a major source of work and income especially in parts of North Wales. Any potential impact from developments affects not only the quality of life for local residents but also could threaten jobs in the tourism industry.

In particular we have concerns that about the idea of 'Priority Areas' where there will be a 'presumption in favour of large scale onshore wind and solar energy development' (Page 36, 38) (It is not clear what a 'presumption in favour' means as it does not seem to fit the description of the process on page 38 which seems to suggest each site would still be evaluated and decided on individually). Decisions on siting new infrastructure such as large wind turbine arrays should not be made at a national level on the basis of a blanket designation of a large area. There should be consideration of individual sites taking account of local opinion and of the impact on the local countryside including the visibility of the development from National Parks and AONB. Priority Areas 3 and 15 (Page 42) cover a huge, very rural area close to National Parks and AONB. Some of the sites identified for potential development such as Hiraethog are outside the National Parks and AONBs but are important carbon sink areas. There should be careful consideration of the damage construction of Wind Turbines can do to such areas. The cost of dismantling turbines at the end of their life should also be included in any evaluations with money set aside for this.

16. Are you...?

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

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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