

**From:** [Gareth Jones](#)  
**To:** [NDE](#)  
**Subject:** Response to Consultation on the Draft NDF  
**Date:** 28 October 2019 16:05:19  
**Attachments:** [Aberedw Community Council Response to Draft NDF Consultation.odt](#)

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Good Afternoon,

Please find attached the response to the consultation on the Draft NDF on behalf of the Aberedw Community Council in Powys.

Thanks

Gareth Jones,  
Member and Acting Clerk to Aberedw Community Council



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

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

The 11 proposed outcomes are fairly generic in relation to the overall aims that the council would wish to see in Wales.

However in our opinion the framework and therefore the proposed outcomes focus very much on the M4 and A55 Corridors and do not address the significant issues that is faced by those of us living in Rural Wales. Some of the areas that are not addressed in any true manner within the framework and outcomes are :

1. Improved access to superfast broadband and other technology.
2. The road infrastructure both North - South within in Wales and East – West from England into areas such as Powys and Ceredigion
3. Access to Health Services – Large parts of our area requires a minimum of 75minutes travel to the closest DGH and the response time for emergency vehicles is not acceptable which again can be in excess of over an hour, even when in response to a 999 call.

## 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:

The framework appears to be very Urban Centric and in our reading the rural areas have been treated as a “add on”, for example a key issue in our rural area is access to services through both improved Transport and Superfast Broadband networks which are essential developments if the young people brought up in our rural areas are encouraged to stay in the area by having access to Cardiff and other large towns and cities within a hour.

## 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?

#### 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 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 improve mobile phone coverage in the areas which currently have limited access?

Although we strongly agree with this policy, there is next to no detail with the draft framework around this issue, nor indeed any detail around what if any Welsh Government Funding will be provided to support the required actions.

#### 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 rollout of charging infrastructure for ultra-low emission vehicles?

We agree with the above statement but the policy is very general and does not mention the specific issues faced in this area in rural communities.

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

## 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>
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Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<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 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?

Although as a Community Council we fully recognise the need to further develop renewable energy, it is our view that the approach taken to both Wind and Solar developments needs to be reconsidered and subject to a separate review and consultation and that key groups including landowners and Town and Community Councils should be fully involved in the development of the strategy and identification of possible development sites.

It is clear that Wales needs to find an agreed methodology to develop a green infrastructure but your current methodology of undertaking consultation on such a sensitive issue for many in our rural community leaves a lot to be desired.

The recent consultation on the NDF was taken over by objectors to the proposals in relation to Wind and Solar and particularly solar.

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

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

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.

Wales is a small country with the similar population to the county of Hampshire and while we agree that there should be a tiered approach to the development and implementation of the framework, we believe that by splitting into three regions and then largely ignoring the rural hinterland in the section on Mid and South West Wales, our area, Powys and the other rural areas of Wales will be forgotten about.

## 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, see additional comments below

### 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, see additional comments below

### 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?

A key issue for the growth of the Welsh language is maintain the young people who have been taught Welsh either as a first or second language in Wales through the development of appropriate employment opportunities within or close to Wales which are then supported by good road networks.

The majority of the young people in our community have left Powys to gain their Higher Education qualifications and then have stayed away as jobs suitable to their

qualification levels are not available within easy community distance of our community.

The provision of free Welsh Language courses for those wishing to learn the language, both local and people moving to Wales would be beneficial

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.

As 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?

We have been provided the following comments by local residents of our community which as a council we largely support in respect to the NDF :

### **Consultation inadequate**

- The dNDF webpages do not link to key ARUP evidence documents, which explain the priority areas (PAs).
- The dNDF is urban centric, and very general except for tightly prescriptive renewable energy (RE).
- ARUP evidence documents contain numerous errors, are poorly set out, demonstrate ignorance of Wales.

### **Lack of Democracy especially for rural communities**

- The NDF and regional strategic development plans will override Local Development Plans and remove local decision-making.
- The dNDF proposes large prescribed RE 'priority areas' (PAs) across 1/5 of Wales, together with a permissive RE policy – with WG making all decisions for >10MW.
- Rural Wales' needs ignored.
- RE policy is tailored to the needs of developers.

### **The dNDF sets 20-year policy without providing justification**

- There is no discussion of contextual evidence or quantification of cost or consequences.
- Other technologies, including off-shore, target capacity/power generation, reducing demand, are not discussed.

### **Devastating Landscape changes within and beyond Priority Areas & impacts on tourism and well-being**

- WG states that landscape change is accepted as inevitable within PAs.
- There is no evidence regarding cumulative impacts.
- There will be visual blight over most of Wales, including parts of National Parks.
- Impacts on tourism and rural amenity are ignored.
- Devastating impact on landscape and on the well-being and livelihoods of rural communities

### **Biodiversity will be severely hit**

- Reversing biodiversity decline is every bit as important as reducing greenhouse gas emissions.
- The dNDF will accelerate biodiversity loss.
- The proposed policy 8 is too general for any practical protection in face of unsuitable development.
- Some European protected sites and many Sites of Special Scientific Interest are within PAs.
- Connectivity and priority habitats/species at grave risk.
- We have no confidence in NRW's ability to protect either designated sites or locally important sites within PAs.

### **Priority Areas are chosen for maximum size, minimum environmental protection**

- Permissive methodology for the identification of PAs – poor justification for 'refined' PAs which are based on consideration of "fixed constraints" which exclude key environmental protections, relegated to a category "variable constraints", of less importance in defining PAs.
- Several criteria maps are inaccurate.

### **Unsound Policy clashes**

- The ARUP methodology ignores practical technological constraints (wind speed, grid availability, access, populations etc.) and key environmental constraints which inform the AECOM methodology incorporated in Planning Policy Wales and Local Development Plans.
- Areas of Wales are now covered by 3 conflicting RE policy designations: TAN 8 Strategic Search Areas, LDP Local Search Areas and now PAs.

Reckless Unfinished Policy which should have failed Habitats Regulation Assessment and Integrated Sustainability Assessment

- Key environmental issues are left for "design guidance".
- Eleven critical issues which are the subject of existing legislation (EIA, Environment Act, WBFGA etc.) including "protecting and enhancing ecosystems and biodiversity" and "cumulative impact" are not addressed.

### **No Confidence in Fair Implementation**

- The recent Hendy Windfarm decision, ignoring Welsh Government's own Planning Inspector's findings, demonstrates that WG does not consider it has an obligation to carefully weigh landscape, environmental and social impacts against RE policy. (Hendy Windfarm decision: [http://www.brecon-and-radnor-cprw.wales/?page\\_id=1265](http://www.brecon-and-radnor-cprw.wales/?page_id=1265))

## **16. Are you...?**



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

<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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**Response Prepared and Submitted by**

**Gareth E Jones, Member and Acting Clerk to Aberedw Community Council**

**On Behalf of Aberedw Community Council**