

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?

Agree

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

Agree with most of them

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...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)				X			
Rural areas (Policy 4)		X					

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

Flexibility is required in policies 1, 2 and 3 to cover various types of appropriate development and these policies should not be limited to specified development of only residential, public services and major trip-generating development. Wales clearly recognising the need for sustainable development through its targets for recycling and low carbon energy development but these targets are unlikely to be delivered without the necessary flexibility in policy.

Waste Management infrastructure is a key type of development that is required to aid the delivery of sustainable development in all communities to enable both rural and urban areas to take more responsibility for the management of their own wastes and recycling where an appropriately located facility is proposed put forward for development.

Policy should also reflect that there will be an increased requirement for additional waste management structure as a result of separate collections of various waste streams through either the necessity to extend existing facilities or provide a greater number of additional facilities to manage the segregate waste streams and as such flexibility through criteria based assessment is necessary to facilitate the required waste management infrastructure.

Policy 4 supports economic development in the extensive rural areas of Wales with a priority for energy generation and the environmental economy and we therefore consider that this correlates to various types of waste management facilities such as composting and anaerobic digestion which can readily fit within a rural area. It should also be noted that there will be an on-going requirement for landfills to appropriately manage the waste streams which cannot be recovered or recycled and these facilities are often in a rural location as they tend to be sited at former quarries which the landfill operations suitably restore back into the surrounding landscape.

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 opinion

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 opinion

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?

Agree

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?

Government subsidy would be required particularly in rural areas to deliver the roll-out of charging infrastructure to encourage the move to ultra-low emission vehicles. As the waste management industry moves towards replacing diesel collection vehicles with ultra-low emission collection vehicles then it could lead to rural areas becoming disadvantaged as without appropriately located charging points in rural areas it will be difficult if not impossible to service rural areas with ultra-low emission collection vehicles. Rural areas in Wales are often in hilly locations and collection vehicles would require appropriately located charging points in order to effectively service such areas as there would be increased drain on the batteries of these heavy vehicles in reaching remote, hilly locations with reduced pick-ups of waste due to the small sizes of such settlements.

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 opinion

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...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and solar developments				X			
District heat networks		X					

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?

Policy 10

Restricting large scale wind and solar developments to defined geographic search areas would arbitrarily prevent sustainable wind and solar schemes that are not within those areas even though such schemes could be demonstrated to be suitably located. An alternative criteria based approach should therefore be included within the Policy so as not to arbitrarily rule out these sustainable developments in areas outside the search areas.

Landfill sites are often in rural locations and any number of closed landfills may be outside the defined geographic search areas. Landfill sites generally already have grid connections in association with landfill gas management compounds which utilise methane from the waste deposit to generate electricity which is supplied to the national grid. This means that emissions of methane (which is a potent greenhouse gas) to the atmosphere are greatly reduced. As landfill gas generation reduces over time the amount of electricity generated reduces and spare capacity in the grid connection becomes available. Closed landfill sites are eminently suitable for solar developments and can utilise the available grid connection therefore making use of otherwise redundant infrastructure which dictates that solar and wind developments more cost effective, more deliverable and more sustainable through a reduced requirement for new infrastructure.

Policy 13

An opportunity is being missed to include renewable energy and low carbon energy projects within Policy 13 to include a presumption in favour of these types of projects.

Policy 14

Energy from waste facilities should be specifically included as they can be co-located with other developments within industrial estates and Enterprise Parks collected combustible wastes from these developments and generating heat which can be supplied to the neighbouring developments with a high demand for heat. This would significantly facilitate the delivery of district heating schemes and this should be incorporated into the sustainability criteria for local plans.

Policy 15

Specified thresholds for should be included for energy masterplans that apply to large scale commercial and industrial developments due to their significant potential to utilise heat and that heat can be supplied by renewable energy generating stations.

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.

Agree

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?

Neither agree nor disagree

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?

Neither agree nor disagree

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?

Neither agree nor disagree

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.

It is regrettable that waste management is barely considered in the document as it is key to delivering a sustainable society and a circular economy. In order to deliver the required level of waste management infrastructure to meet the ambitious goals of Wales it is necessary to provide Plan Policies which encourage such developments and do not unduly restrict their delivery.

Flexibility in planning policies is key to enable the waste industry to significantly invest in the infrastructure required to provide the necessary strategic development. Economies of scale are provided through flexibility to transfer waste across administrative boundaries through the provision of a network of integrated waste management facilities across the UK. In the same way that it is not feasible to provide all types of all waste management facilities in every settlement it is not feasible to provide all types of all waste management facilities in a wider area. A geographical spread of facilities across Wales and England enables an economy of scale to meet the waste management needs of an area or region irrespective of any settlement boundary and development should not be unduly restricted to an administrative area to satisfy a planning policy requirement.

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 Comments.

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 Comments.

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 Comments.

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?

Clarification on the role of TAN 21 and Planning Policy Wales is necessary and how the NDF sits in relation to them.

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	Mike Harty
Organisation (if applicable)	Biffa Waste Services Limited
Preferred contact details (email/phone/post)	<div></div>

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

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

No Response