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Planning Policy Branch
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Submitted by email only: ndf@gov.wales

14th November 2019

Re: National Development Framework 2020-2040: Consultation Draft

Dear Sir / Madam,

Introduction

Gladman welcome the opportunity to comment on the National Development Framework 2020-2040 Consultation Draft (NDF). This letter provides Gladman's response to the consultation document.

Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure. Whilst Gladman's business activities have primarily been focussed in England and Scotland, we do now have a number of land interests in Wales which are being promoted through the Development Plan process and (where appropriate) through the development management system.

In addition to this current consultation, Gladman note that the Welsh Government are also holding a public consultation on 'Delivery of Housing Through the Planning System' – revisions to Planning Policy Wales and associated advice and guidance. Gladman will be submitting a separate response to this consultation, but note that the two consultations provide useful context for one another. Gladman are significantly concerned regarding the approach set out in the 'Delivery of Housing Through the Planning System' consultation seeking to revoke TAN1 in its entirety and will be setting out our objections to this in due course. This proposed change in national planning policy, if implemented, will have a significant negative impact on housing growth across Wales.

General Comments on the NDF

With regards the Draft NDF Gladman raise significant concerns over the fact that it will not be subject to formal examination. The level of scrutiny will be at the discretion of the Welsh Assembly. Gladman take the opportunity to emphasise the importance of an appropriate degree of scrutiny for this document as it will provide the overall planning framework for Wales and will set the tone for the subsequent SDPs and LDPs.

A further general concern Gladman wish to raise is with regards to how the NDF will relate to the subsequent SDPs and LDPs. Our specific concern relates to the evidence base that will be prepared for these lower tier plans and situations which may occur whereby this evidence does not support or further contradicts the proposals within the NDF. This matter is discussed further below in relation to the Green Belt proposals (to which Gladman raise significant objections).

Gladman note that the Draft NDF is heavily focussed on affordable housing and makes limited references to the delivery of market housing and on the occasions market housing is referred to, this is often in a negative context. This is concerning given that housing supply and delivery has suffered generally. The draft NDF fails to acknowledge the key role of the private sector in the delivery of much needed housing. The response should therefore be more of a holistic one in relation to both market and affordable housing. Focussing so heavily on affordable housing will not solve the overall housing supply problems and housing crisis.

Gladman also note the reference within the Draft NDF in Section 4, which states *“Choosing to develop new towns and enabling sprawling greenfield development would be to ignore the untapped potential of places which already have town centres, universities and colleges, public transport infrastructure and a good range of public services.”* It is considered that this paints a misleading picture that all greenfield development is bad, without considering the significant benefits that a degree of greenfield development on the edge of existing sustainable settlements could bring in terms of the delivery of much needed housing and associated community benefits. Gladman consider these types of comments to be unhelpful and only add to the already negative perceptions of the housebuilding industry across Wales. This comment within the Draft NDF would also appear to remove the ability to consider new settlements as an option for the delivery of housing, Gladman consider this to be a short-sighted approach which could act to stifle growth opportunities.

Gladman note the absence within the consultation document to any reference of the lack of land supply currently faced in Wales. Given that the shortage of a five year housing land supply is a common issue across nearly all the local planning authorities in Wales we would consider that this warrants reference in the NDF. Whilst we recognise the current proposal to revoke TAN 1 would take away the requirement to show a five year land supply, this is the current context and helps demonstrate the extent of the housing crisis facing Wales.

NDF Outcomes

The Draft NDF outlines 11 outcomes that are collectively where the Government want Wales to be in 20 years' time. Gladman are supportive of the Draft NDF identifying the key outcomes it seeks to achieve, it is important that these follow through into the SDPs and LDPs and that policies and allocations enable these objectives to become a reality.

Gladman suggest that greater emphasis should be placed on the delivery of both market and affordable housing within the outcomes as this is a fundamental issue which the NDF should be seeking to tackle at the national level.

Chapter 4 Strategic and Spatial Choices: the NDF Spatial Strategy:

The proposed overall spatial strategy seeks to co-locate homes, jobs and services and consequently focuses growth on cities and large towns. The consultation document outlines that the focus on growing the urban areas will result in a critical mass of people to sustain good public transport services and a range of economic activities. The document confirms that in all parts of Wales, the strategy supports sustainable growth.

The document makes reference to three existing main urban clusters of cities and towns:

- Cardiff, Newport and the Valleys;
- Swansea Bay and Llanelli; and
- Wrexham and Deeside.

The draft NDF proposes that new large scale employment opportunities and housing growth should occur predominantly, though not exclusively, in these areas. The consultation document highlights that development in towns and villages in rural areas will support local aspirations and need and that this will complement rather than compete with efforts to grow the towns and cities.

In principle, Gladman support the Welsh Government in directing a significant amount of growth to these existing main urban cities and towns, however believe that capacity work is required to support this approach. Whilst Gladman are supportive of the approach to focus growth in these key locations which offer sustainable development opportunities, it is also important that the role and functions of the smaller towns and villages across Wales are properly considered through the relevant LDPs. These settlements play an important role in the provision of services and facilities and their ability to accommodate future housing and economic growth which should be recognised. It is essential that the needs of sustainable rural settlements across Wales are assessed and meaningful growth apportioned to them to ensure their ongoing vitality and viability.

The Draft NDF contains a plan which highlights the national and regional growth areas, Gladman are supportive of this top tier plan providing the overall strategic directions for growth and showing this in a visual manner. This provides a high level framework for the regions and local planning authorities to seek to deliver.

Policy 1 – Sustainable Urban Growth

Policy 1 relates to the support of sustainable urban growth stating that *“urban growth should support towns and cities that are compact and orientated around urban centres and integrated public transport and active travel networks. Higher density and mixed use development on sites with good access to urban centres and public transport hubs, including new and improved Metro stations, will be promoted and supported.”* Gladman are supportive of the principles provided for through this policy and the logic behind compact, high density developments around transport corridors and hubs, however it needs to be recognised that development of this type, i.e. high density and mixed use, may not always be appropriate and consideration will need to be given to site specifics and also the particular location of a proposed development.

Given the other policies within the Draft NDF, it is apparent that this type of development is the key focus for the next 20 years across Wales. Gladman query whether the necessary assessment of capacity have been undertaken to support such an approach and whether placing such a reliance on sustainable urban growth may actually limit the delivery of new homes.

Policy 4 – Supporting Rural Communities

Policy 4 outlines that the Welsh Government supports sustainable rural communities and appropriate proportional growth in rural towns and villages. The policy moves on to outline that the future for rural areas are best planned for at the regional and local level and that SDPs and LDPs should plan positively to meet the needs of rural communities.

Gladman welcome the inclusion of a policy within the Draft NDF recognising the importance of suitable, sustainable growth to rural communities. This provides an overall framework for policies and allocations at the regional and local level to provide for growth in these rural communities. Gladman would agree that the regional and local level is more appropriate for providing the detailed policies and allocations for the rural areas.

Policy 5 – Delivering Affordable Housing

The Draft NDF acknowledges that providing housing in Wales at a level which meets needs is a priority, with specific reference made to the provision of affordable housing. The consultation document then refers to a range of estimates of housing needs based on different demographic scenarios and provides details of the central estimate as follows:

- 114,000 homes across Wales up to 2038
- During initial 5 years (2018/19 – 2022/23) – 8,300 additional homes annually with the following split across the three regions:
 - South East Wales 57%
 - Mid and South West Wales 24%
 - North Wales 19%

These estimates also indicate that the provision of affordable homes should be a key focus of housing delivery and estimate that on average 47% of additional homes should be affordable for the 2018/19- 2022/23 period, equating to an average of approximately 3,900 affordable homes per year.

Following attendance at round table event discussing the Draft NDF, where the Chief Planner at the Welsh Government was present, Gladman understand that the housing figures referenced in the Draft NDF are not intended to be targets. Gladman recommend that the NDF should clarify that these are not housing supply targets. This is a critical point given that the NDF is the lead policy document which the SDPs and LDPs have to be in compliance with, this clarification within the NDF would ensure that the subsequent lower tier plans do not misinterpret this and that housing needs are adequately provided for.

Having provided the context in terms of the scale of affordable need, Policy P5 goes on to outline that SDPs and LDPs should develop strong evidence based policy framework to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In addition to setting development plan targets, they should identify sites for affordable housing led development and explore all opportunities to increase the supply of affordable housing.

The consultation document highlights that the ‘delivery gap’ has widened due to greater reliance being placed on the private sector to deliver the affordable housing. The NDF recognises that to combat this, a more balanced approach to delivery is required with local authorities and RSLs building more affordable homes and that the use of public land will be important for the delivery of this.

It is important that the Welsh Government have properly considered the viability considerations and implications of their affordable housing proposals, for example whether an average requirement of 47% affordable housing is viable and deliverable.

Gladman agree that the provision of affordable housing across Wales is a key priority and that the SDPs and LDPs should be setting delivery targets and allocations in order to ensure the delivery of these homes. The consultation document recognises that affordable housing is not uniform across Wales and that different responses will be needed in different parts of the country to meet the needs of local communities. Gladman support this recognition and believe that the local authorities will need to tailor their policies and allocations to ensure they respond to and address the specific local needs.

As noted above the consultation document focuses heavily on affordable housing solutions, rather than an approach seeking to boost the delivery of both market and affordable housing. Gladman believe that the Welsh Government need to take a more proactive approach to boosting the delivery of housing in general and that the strong focus on affordable housing may detract from overall housing delivery.

Whilst Gladman support the inclusion of Policy 5 and recognise the importance of delivering affordable housing, we object to this being the sole housing policy within the Draft NDF. Gladman recommend that the NDF should include an additional policy referring to the provision of all new homes not just affordable housing. Gladman will be providing further comments regarding housing delivery in Wales in response to the current consultation on PPW and the proposals to revoke TAN1 in its entirety.

Chapter 5 - The Regions:

The Draft NDF identifies three regions within Wales and as well as looking at the national scale, outlines ambitions and policies for nationally important growth and development in the three regions. Gladman are supportive of the NDF providing differing approaches and policies to the three regions as this recognises and responds to the varied nature and character of areas across Wales.

Policy 16 – Strategic Policies for Regional Planning

Policy 16 outlines the role of SDPs and outlines the overarching principles that these plans (and where required constituent LDPs) should be identifying, amongst other things a spatial strategy, housing provision and requirement and the spatial areas for growth. The policy concludes by stating that the Welsh Government requires SDPs to come forward in each of the three regions to deliver the requirements of this policy. Gladman are supportive of this regional scale of planning and believe that there are certain strategic issues that will be best addressed at the regional level. Gladman query what mechanism is in place to ensure the delivery of these SDPs and the timescales that these are likely to come forward over. Further clarity is needed with regards to how and when these SDPs will be adopted. Gladman are concerned there may be a 'policy vacuum', in which strategic issues are not dealt with due to limited guidance provided in the NDF and delays in the preparation and adoption of SDPs. Gladman are concerned that this could have negative implications for the delivery of housing across Wales.

North Wales:

Policy 17 – Wrexham and Deeside

Policy 17 identifies Wrexham and Deeside as the primary focus for growth in the region and directs SDPs and LDPs across the region to recognise these areas as the focus for housing and economic

growth. Gladman support Wrexham and Deeside being identified as a primary focus for regional growth and investment. This however, should not be at the expense of other sustainable locations which will also need a degree of growth to meet needs and maintain their long term vitality and viability.

Policy 18 – North Wales Coastal Settlements

Policy 18 supports the built up coastal arc from Caernarfon to Deeside as the focus for managed growth, and that this area has an important sub regional role supporting the primary growth area of Wrexham and Deeside. The policy states that SDPs and LDPs should recognise the role of this corridor as a focus for housing, employment and key services.

Gladman support the Draft NDF recognising the importance of growth in the settlements in this corridor to support the primary growth in Wrexham and Deeside. Within this corridor there are a number of sustainable settlements which offer appropriate locations for housing and economic growth.

Policy 19 – Green Belt in North Wales

The supporting text for Policy 19 outlines that SDPs must identify a Green Belt that includes the area to the North East of Wrexham. Gladman raise concern regarding this approach, the evidential justification and how this relates to the area being the primary focus for growth within the region. Gladman also query the wording of the Draft NDF and whether it is intending through this policy that the SDPs must ‘identify’ or must ‘consider’ new Green Belt in this location.

Gladman submit that the SDP would need a robust up-to-date evidence base to justify the inclusion of land within this new Green Belt and how the extent of the land proposed fulfils the purposes of the Green Belt as set out within paragraph 3.63 of PPW. This states that *“the purpose of the Green Belt is to:*

- *Prevent the coalescence of large towns and cities with other settlements;*
- *Manage urban form through controlled expansion of urban areas;*
- *Assist in safeguarding the countryside from encroachment;*
- *Protect the setting of an urban area; and*
- *Assist in urban regeneration by encouraging the recycling of derelict and other urban land.”*

Within this location it will be important to strike the right balance between the creation of new Green Belt and the land available to bring forward to meet needs and provide for the growth aspirations within the region. Land should only be designated as new Green Belt if there is a robust evidential basis for this. Gladman also query whether any work has been carried out to understand how a Green Belt in this location might align with plans in Cheshire West and Chester.

Gladman recommend that the Draft NDF is modified and that it identifies potential new Green Belt as an issue that the SDP should consider through its evidence based work and plan preparation and not that the NDF require the SDP to identify this area as Green Belt.

Policy 21 – Transport Links to North West England

As outlined in Policy 21, the Welsh Government will work with local and regional authorities in North Wales and North West England to ensure transport investment and to strengthen cross boundary transport links. The Policy goes on to state that SDPs and LDPs should support improved transport links between North Wales, Chester, Liverpool and Manchester and plan growth to maximise the potential opportunities arising from better regional connectivity.

Gladman agree that there are strong functional relationships between the settlements and regions in North Wales and North West England, therefore providing improved transport links is fundamental to ensuring the necessary access and connectivity to jobs, services and facilities in the neighbouring areas. Gladman agree that to address these strategic issues cross boundary investment and action may be required.

South East Wales:

Policy 27 – Cardiff

Policy 27 outlines that Cardiff will retain its role as the primary national centre for culture, sport, leisure, media, night time economy and finance and that the Welsh Government supports Cardiff's status as an internationally competitive city and a core city on the UK stage. Gladman agree with the recognition of Cardiff as a nationally important city and support its identification as one of the primary focusses for growth in the South East region.

Policy 28 – Newport

Policy 28 relates specifically to Newport and outlines how the Welsh Government supports Newport as a focus for regional growth and wishes to see the city fulfil its potential as a second focal point for the region. Gladman are supportive of Newport being identified as a focus for growth, it is a sustainable settlement and it is key that growth builds on the positives that the area has to offer.

As outlined in relation to Policy 17 'Wrexham and Deeside', whilst it is supported that the Draft NDF identifies these key locations for regional growth this should not be at the expense of other sustainable locations which will also need a degree of growth in to meet needs and maintain their long term vitality and viability.

Policy 30 – Green Belt in South East Wales

Unlike Policy 19, there is no ambiguity regarding whether Policy 30 requires the identification of new Green Belt or whether through the SDPs this should be considered. Policy 30 clearly states that *"Welsh Government requires the identification of Green Belt through a Strategic Development Plan to manage urban form and growth in South East Wales..."* The consultation document outlines that this should include the area to the north of the M4 from the Severn crossing to North Cardiff. Gladman object to this requirement as the need for this new Green Belt currently has no evidential basis.

Similar to Gladman's response to Policy 19, we raise objections regarding the proposals to introduce additional Green Belt in South East Wales. This type of policy provides long term protection, as Green Belts are infrequently reviewed, it is therefore fundamental that there is evidence regarding the need for this and also the appropriate locations for this.

It is unclear how these proposals relate to the growth strategy and whether it will unnecessarily restrict growth in sustainable locations. Through the SDPs there will need to be sufficient evidence to demonstrate the land is appropriate for designation as Green Belt and the Draft NDF currently does not have this evidence base. Gladman object to the current proposals which leave the detail of these proposed new Green Belts to come through the SDPs. Gladman make reference to paragraph 3.60 of PPW10 which states *"Around towns and cities there may be a need to protect open land from development. This can be achieved through the identification of Green Belts and/or local designations such as green wedges. Proposals for both Green Belts and green wedges must be soundly based and should only be employed where there is demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust."* The NDF does

not currently have the evidence base to justify the requirement for the designation of new areas of Green Belt and has not adequately considered the other policy mechanisms.

Gladman again refer to paragraph 3.63 of PPW which sets out the purpose of the Green Belt. It is fundamental that any new Green Belt is providing for these purposes and not merely being used as a means to unnecessarily restrict growth.

Gladman remain unconvinced whether these proposals and the potential implications regarding the areas ability to accommodate future growth, have been given the necessary consideration. As per comments in relation to the new Green Belt to the North East of Wrexham, it will be crucial to strike the right balance between the designation of new Green Belt and land available to be brought forward to meet housing and economic need and provide for the overall growth aspirations of the region.

Gladman strongly recommend that the wording of Policy 30 is amended to ensure that this is not a strict requirement to identify new Green Belt but rather a requirement for this to be considered through the SDP. This would then allow the evidence base to be prepared and inform if appropriate the identification of new Green Belt in this location.

Gladman's concerns regarding the creation of new Green Belt do not just relate to housing need and growth potential of the next emerging plans, but rather the plan period after this where housing need may end up restricted due to these proposed designations.

Conclusions

Gladman welcome the opportunity to comment on the consultation draft of the NDF and hope the submissions made within this representation are considered constructive.

Gladman are concerned by a various elements of the Draft NDF and the potential implications that this may have on housing delivery across Wales. A number of these concerns are briefly summarised below:

- The potential for this top tier plan to be the subject of minimal scrutiny / examination
- The apparent lack of focus on market housing delivery and negative connotations in relation to greenfield development.
- The proposals requiring the identification of new Green Belt without any current evidence base to support this.

Should you wish to discuss any of the matters raised through this submission in more detail please do not hesitate to get in touch with one of the Gladman team. Gladman request to be kept informed of any further public consultations on the NDF.

Yours sincerely,

Nicole Burnett
Senior Planner
Gladman

Consultation Response Form

Your name	Nicole Burnett
Your address	Gladman House Alexandria Way Congleton Business Park Congleton CW121LB
Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	<u>Gladman Developments Ltd</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 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Please see attached detailed representations

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:

Please see attached detailed representations.

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?

Please see attached detailed representations

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?

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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?

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 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.

Please see attached detailed representations regarding the policies for the three regions.

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?

Please see attached detailed representations for general comments on the Draft NDF

16. 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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