

Consultation Response Form

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<u>Organisation (if applicable)</u>	Tarmac

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

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

1. Tarmac considers that the eleven NDF Outcomes included within Section 3 of the draft document are poorly constructed and lack the ambition that a document of this nature could have engendered.
2. The stated Outcomes appear to lack the drive and purpose that could be achieved within and beyond Wales over a 20-year period. Furthermore, there is a notable absence of a substantive economic intention to the Framework as a whole and the Outcomes specifically to the extent that Tarmac considers that an opportunity to implement a sustainable Framework and to achieve a sustainable Wales in its overarching context has been missed. The NDF has little or no reference to its context, relationship and opportunities beyond Welsh borders. These relationships are critical in terms of the general sustainability of the Wales economy and environment.
3. In general terms Tarmac considers that it is important that the drive towards greater implementation of sustainable principles through the application of the NDF is consistent with prevailing and emerging national policy, the Future Generations and Well-Being Act and local policy. In addition there is significant work being undertaken by Welsh Government and other governmental and non-governmental stakeholders that has the potential to shape the NDF and to provide context and structure to the proposed Outcomes. The draft NDF suggests that these Outcomes have become too diluted and vague such that they lack the sufficient drive to deliver investment and development where and when it is necessary.

General Objectives

4. The approach that the NDF takes to the challenges and opportunities is considered to be oversimplistic: it does not actually embrace or identify what the objectives of the opportunities are and this lacklustre approach is repeated throughout the remainder of the NDF.
5. The commitment to addressing climate change is welcomed, but the NDF does not provide a robust enough roadmap to trying to address the issues that might arise as a direct or indirect result of climate change: there is a need to consider the implementations of the change in its broadest sense through the delivery of more effective infrastructure, coordinated approach on the renewable energy provision, and joined up thinking on growth. Effective delivery of these elements must be viewed not as detrimental or accentuating climate change but in assisting and future proofing Wales and understanding any changes in the way that the population functions.
6. The reference on pages 16/17 to aggregates recognises their importance in delivering place making, housing and infrastructure and acknowledge that a consistent and long-term supply is required. This is welcomed by Tarmac.
7. However, the text conflates the terms “minerals” and “aggregates” and also fails to recognise the significant role within the UK economy that minerals and aggregates from Wales plays in the wider economy. The nature of the industry is such that the flow of building materials between Wales and England (in both directions) is significant. The potential benefits to the Welsh and UK economy and environment are a material consideration in realising future opportunities for minerals extraction. The NDF should recognise this and use it as a positive opportunity to promote sustainable development.

Minerals

8. Specifically in respect of Outcome 9: ***“Wales’ natural resources, including its minerals, coast, water, forests and landscape, support a range of activities and***
9. ***sectors and are assets of great value in their own right.”***
10. The proposed Outcome does not actually identify any sense of targeted achievement that it is seeking to implement and the supporting text (below) uses very generic and unsubstantiated phrases: *“The environmental, social and cultural value of our resources will be managed, maintained and enhanced, while economic benefits will be utilised sustainably and appropriately by promoting nature-based solutions and a circular economy. Across Wales better resource choices will be reflected in more sustainable places, which benefit from reductions in levels of pollution, and be healthier and more liveable”*.
11. It is not entirely clear what these sentiments are trying to achieve. If it is the

effective use of resources, including minerals resources, to ensure that they are worked in such a manner that is efficient and co-ordinated across Wales and the regions, then it should rely on similar text included within PPW10.

12. Any revision should also make reference to the direct and indirect economic significance of the extractive industry in Wales and that this text should rely heavily on established policy included within PPW10.

Infrastructure

13. There is a general absence of reference to potential infrastructure opportunities within Wales within the Outcomes for the intended period of the Framework.
14. Apart from potential nuclear provision in North Wales, there is no reference to any planned or proposed significant infrastructure projects elsewhere. It is acknowledged that some of the infrastructure projects lie to be determined outside of Wales (i.e. by the UK Government) but notwithstanding this the potential within the NDF should surely exist for the Welsh Government to either identify potential major projects over the next 20 years as a minimum, and actually to support the consideration in principle of such projects even if they do not wish to commit to the implementation at this stage.
15. There is no specific reference to tidal power schemes, the enhancement of the National Grid network or major road upgrades, all of which have been high profile planning issues in Wales over the last ten years and none of which has come to fruition thus far. Tarmac considers that the NDF should have the confidence to identify these important projects in order to give them the impetus that they appear to require.
16. This is compounded by the absence of any reference within the draft NDF to the processes associated with Nationally Significant Infrastructure Projects (secured through the DCO process), to Developments of National Significance or to the Wales Infrastructure Commission. In order for the NDF to be of worth in respect of infrastructure, the context of these procedures need to be explained and put into context with the Wales Infrastructure Investment Plan (WIIP).
17. If it is the case that there is a stronger connection to and influence of the WIIP then that document will need swift review unless the NDF is to simply follow what is included within it already, which has a 2012 base date. This is not considered to be robust enough to form the basis of development until 2040.
18. The draft NDF (final sentence of Page 15) identifies the potential issues caused by the requirement for building materials in the context of infrastructure: *“When construction leads to a spike in demand, caused for instance by major infrastructure projects, pressures are placed on the minerals industry to provide the necessary materials”*. If the NDF does not identify these potential infrastructure projects, and does not provide a framework for the minerals industry then those pressures will be exacerbated.

13. 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	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" 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 Spatial Strategy is founded on the identification of just three regions within Wales. There is little or no explanation of this approach and compares with the current Wales Spatial Plan (which the NDF will replace) that identifies six spatial areas and also with Welsh Government research for the NDF that was carried out by Cardiff University and which recommends four regions. The definition of the regions is crude, makes little spatial sense and does not necessarily reflect the geography, context, opportunity and challenges that need to be addressed within Wales to inform the Spatial Strategy.
- In terms of growth opportunities, the Strategy relies on the key existing settlements for growth and investment with a focus on cities and large towns as the main development areas. It strongly discourages what it sees as the only alternative: *"Choosing to develop new towns and enabling sprawling greenfield development would be to ignore the untapped potential of places which already have town centres"*.
- This is a very simplistic analysis of what is good and bad growth and one which does not reflect history or opportunities. It is very restrictive and risks resistance to all greenfield growth wherever it is proposed and whatever form it might take, regardless of existing services that might be within the

catchment area of the development, and without recognising the potential that the delivery of these services might be instigated by large scale new development.

4. Greenfield growth will still be needed during the next 20 years simply because some urban areas (including Cardiff as evidenced in the NDF) have limits and capacities. New settlements will need to be an available option in accordance with the recently adopted PPW 10.
5. It is noted that page 22 top of second column includes reference to the potential to “squander key assets in the form of productive countryside and natural resources”.
6. By “natural resources” it is assumed in this respect that this will include the potential for minerals to continue to be won in the countryside where they are found. It should be noted that minerals are an acceptable form of development in the open countryside in general terms. This approach is reflected in PPW 10 and should be reaffirmed in the NDF.
7. In terms of the spatial strategy (page 24 and onwards) Tarmac does not have a strong opinion about the location of this development in specific terms, whether that is within existing or proposed urban areas. However in relationship to the supply of building materials, the identification of national and regional growth areas whilst welcome, is poorly defined, limited in its geographical extent, and poorly communicated within the NDF.

Housing

8. As a landowner and also as a building material supplier, Tarmac has a vested interest in the need for an appropriate supply of housing to be realised over the duration of the NDF.
9. Tarmac is concerned that the NDF signals a fundamental change to the delivery of housing in Wales, and that this new model is to be realised with immediate effect according to the statistics included within the NDF.
10. Although there is not a specific change to housing numbers in a policy context, the overriding message from the NDF is that the “need” to 2038 of 114, 000 new homes across Wales is imposed as a limitation to supply. The chart on page 30 of the NDF clarifies the implications for the housebuilding sector:
 - in 2018 about 6600 homes were built. This was higher than the average for the last 10 years;
 - about 5600 (approx.. 85%) were delivered in the private sector with the remaining 1000 being delivered by the public sector/Registered Social Landlord (RSL) dwellings;
 - the NDF proposes a higher annual amount of 8300 homes over the next five years;
 - however, this is predicated on market housing provision falling from 5600 to

4400 (a 20%+ reduction in 2018 figure) with local authority/RSL provision rising from 1000 to 3900 per annum (at 290% increase)

11. This increase in public sector provision is expected to take place from 2018/19 (i.e. now) for the next five years.
12. The concerns are obvious and significant: overall requirement and annual figures are much lower than current LDP housing provision. The apparently deliberate depression of current market housing performance is at complete odds with efforts to improve delivery and (especially as) the significant and immediate rising RSL/public sector provision is not supported by that sector at the moment.
13. In general terms these figures raise significant concern about the Welsh Government's "Investment in Wales" and the apparent absence of a robust economic strategy is also unhelpful in this respect. Rather than suggest sustainable approach to growth and development over the next generation, the current strategy and policies suggest an unsustainable approach to the next generation of growth prospects.

National Forest

14. As a major landowner within Wales, Tarmac identifies the proposed National Forest (Policy 9) as a major ambition. The expansion of forest by some 2000 ha per year is significant and equates to approximately 5 km².
15. No information is given even indicatively or on any spatial diagram or plan as to the location or extent of the Forest and caution must be given to the presence of resources (including mineral resources) and available sites in determining its extent and location(s).

14. 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 checked="" type="checkbox"/>

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

15. 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 checked="" 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?

16. 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 type="checkbox"/>	<input checked="" 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 roll-out of charging infrastructure for ultra-low emission vehicles?

17. 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

18. 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>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 Tarmac has no direct interest in the above it is aware that other stakeholders have raised significant concerns about the approach to renewable energy that is proposed in the NDF.
- With regards to the Wales Energy Priority Areas identified on the map on Page 42 of the draft NDF, Tarmac has a number of operational and landownership interests land included within most of the fifteen identified areas. The NDF is not clear on whether the identification of the Priority Areas will act as a constraint on the potential for other developments within those areas (i.e. whether there is a presumption in favour of renewable energy at the expense of other types of development). Tarmac request clarification on the relationship between potential renewable energy areas and other forms of development.
- It is on this basis that objection is raised.

19. 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.

20. 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

21. 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

22. 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 checked="" 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.

Minerals

1. Tarmac's comments in respect of general regional issues are included below. More fundamentally to its core business, Tarmac believes that the NDF's approach to minerals supply must rely on a national rather than regional approach.
2. Currently the draft NDF offers no substantive guidance within which the continued and sustainable supply of minerals can be maintained. This is a fundamental point given the proposed role of the NDF as set out in the "*Model of NDF Influence*" diagram on Page 11 of the NDF, which identifies that it will influence and be influenced by Planning Policy Wales (and it is assumed technical Advice Notes and Minerals Technical Advice Notes (MTANS)).
3. Importantly from a minerals perspective the overarching policy set out in PPW 10 (section 5.14) establish principles against which the allocation of mineral sites in development plans, safeguarding of resources, future potential areas and the determination of minerals planning applications are to be considered.
4. However there is a pressing need to update the MTANS and particularly MTAN1: Aggregates which dates from March 2004.
5. The structural changes to the planning process, planning policy and the industry since then is significant and for PPW and MTAN1 to be an integral part of the National Development Framework places a requirement on that document to be current. Tarmac would be pleased to be involved in the

process of updating that document alongside the Welsh Government and other stakeholders in the minerals supply industry.

6. The comments by Tarmac above in respect of the importance of minerals provision in respect of the development of infrastructure (final sentence of Page 15) are equally relevant in respect of minerals. If the NDF does not identify potential infrastructure projects (and development more generally), and does not provide a framework for the minerals industry, then the anticipated pressures on the supply and demand of the minerals industry will be exacerbated.
7. With regard to the minerals-specific text for each of the regions, the Tarmac comments are largely consistent: that the Framework is devoid of minerals policies or guidance.
8. For North Wales, the draft NDF makes reference to sand and gravel deposits in Wrexham and Flintshire and crushed aggregates in Flintshire. The text included at Page 54 is simply a statement of fact in terms of what the current extraction and markets might look like. There is nothing to suggest that continued extraction would be supported, nothing to support the supply of that material to development opportunities both in Wales and throughout England, and nothing to support the movement of materials either by road or rail.
9. The text relating to Mid and West Wales (Page 60) recognises the importance of the minerals industry to the region and the important role in supporting development across Wales and into England. However, it omits the significance of dredged material in the Bristol Channel that is discharged at ports in the region and also is merely a factual summary of supply and demand within the region and beyond rather than an actual proposal to identify or preserve existing and future minerals opportunities or policies.
10. Within the South East Wales regional commentary there is almost complete omission of any reference to minerals issues, an irony given the historic importance of minerals resources to the historic growth of the region.
11. This silence is of concern given the significance and scale of the proposed growth within the South East over the next 20 years and the fundamental need for building materials to achieve these growth targets. The only reference to aggregates is in the final sentence of the NDF (Page 69) which claims that *“the region is heavily dependent on marine aggregates from the Bristol Channel and the Severn Estuary and minerals from this area serves both the Welsh and English markets.”* This is incorrect. The dredging industry is important and supplies the vast majority of sand and gravel resources for the region. However, the region relies on the crushed rock industry to supply aggregate material to the construction industry. There continues to be heavy demand for these materials throughout the region.
12. In order to rectify the absence of substantive minerals policies in the NDF, Tarmac would be prepared to discuss the potential to improve the document in tandem with the WG and other relevant stakeholders. A significant amount

of work has been undertaken by organisations such as the Minerals Products Association and the Regional Aggregate Working Parties to inform documents including PPW, LDPs and MTANs and it is important that this information that is both historic and emerging is relied upon to shape the Framework and the proposed Strategic Development Plans to ensure that the supply of materials can meet the demand in Wales and beyond for the next 20 years.

13. Tarmac also wishes to express its comments on other sectoral issues within the regions as below:

North Wales

14. The housing figures for North Wales are significantly lower than recently planned provision. The NDF allocates 19% of homes throughout the duration of the NDF to North Wales which equates to 19,400 homes over a 20 year period. This figure equates to an annual housing need of just 917 homes per annum compared to the combined figure for the current LDP network across the identified North Wales region (noting that Flintshire and Wrexham are deposit plans and their figures may be subject to change) of 2376. The NDF housing figure for North Wales is therefore 59% lower than that currently anticipated, 47% of which are allocated as affordable housing.
15. The imposition of a Greenbelt located to the north-east of Wrexham is objected to by Tarmac. The use of greenbelt is a dated concept and whilst it is acknowledged that minerals extraction in the Greenbelt and open countryside is an acceptable operation in principle, the allocation of this restrictive approach to planning policy stagnates the housing market and is far too blunt and negative an instrument if the intention is to further restrict development in the countryside. It is also noted on the strategic regional diagram that the National Growth Area overlaps the Greenbelt for the north east of Wales and it is difficult to see how the two concepts can be merged.
16. Rather than a Greenbelt, it is considered that areas of significant green infrastructure, potentially incorporating areas identified for the National Forest (Policy 9) is likely to be a much more useful and constructive approach to “conserving” countryside by placing it in a functional setting rather than a restrictive context.
17. The absence of any meaningful infrastructure proposals within the NDF for the North Wales region is also recognised and there are a number of potential schemes that should be referenced, including the Third Menai Crossing and improvements to the A55.
18. Finally, and consistently across the regions, the absence of substantive economic strategy is of significant concern.

Mid & South West Wales

19. With regards to the Mid & South West Wales region there is recognition within the text that there is significant regional variation within the identified area and

that effectively it will be treated in two sub-regions. It is not clear whether there would be a single SDP or more.

20. The housing figures are significantly lower than recently planned provision. The NDF need of 23,400 homes over the 20 year period gives an annual figure of 1,170 homes. The combined annual figures from just Swansea, Neath Port Talbot and Carmarthenshire's current adopted LDPs is 2,450. The NDF proposal is less than 50% of this figure with one half of the homes to be provided by affordable housing.

21. In addition to the absence of substantive economic policies, there are a number of key projects that might be identified as being forthcoming over the NDF period including:

- Swansea City Centre redevelopment;
- Neath Town Centre redevelopment;
- Port Talbot and Baglan;
- Mid-Wales Road and Rail improvements;
- The proposed National Grid upgrades;
- Fabian Way Innovation Corridor, Swansea; and
- Swansea Bay Tidal Lagoon.

22. The absence of development opportunities and growth areas throughout vast swathes of mid-Wales effectively from the M4/A48 through to Welshpool is of concern and is not helpful in terms of growth in a sustainable manner of Mid & South West Wales.

South East Wales

23. The proposed strategy for South East Wales is poorly presented and inconsistent.

24. The premise for the growth in the region is predicated on a focus being placed on the development of Cardiff, Newport and "the Valleys". It should be noted that the term "the Valleys" is not defined specially within the NDF and that there is no specific policy relating to their growth, as there is for Cardiff and Newport.

25. The strong encouragement for growth across the region is contradicted by:

26. A significant reduction (almost 50%) in the quantum of housing. The NDF requirement divided equally gives an annual figure of 3,650 dwellings per annum. The current round of LDPs proposes an annual target of 6,832 per

annum. 48% of this reduced commitment is expected to come from affordable housing;

27. The limited number of identified growth locations. The WSP listed 14, the NDF has just six. The WSP identified and described three strategic growth areas, the NDF has a vague wash-over National Growth Area which is unclear in intention, effect and is undefined;
28. The proposed Greenbelt is an outdated concept and unhelpful to effective planning. Rather than a Greenbelt, it is considered that areas of significant green infrastructure, potentially incorporating areas identified for the National Forest (Policy 9) is likely to be a much more useful and constructive approach to “conserving” countryside by placing it in a functional setting rather than a restrictive context;
29. The virtual silence on economic growth or priority sectors and the absence of any substantive policies on these issues;
30. The absence of any infrastructure policies which, in an area, of major infrastructure underinvestment is particularly significant. A number of transport and energy schemes should be identified including the desperate need for enhancements to the M4.

23. 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

24. 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

25. 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?

N/A

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.

N/A

26. 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?

27. 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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