

From: [REDACTED]
To: [NDE](#)
Subject: Consultations comments
Date: 15 November 2019 09:13:42
Attachments: [draft-national-development-framework-response-form_LE.docx](#)

Please see attached some comments on the NDF consultation.

Lyn Eynon

Consultation Response Form

Your name	Lyn Eynon
Your address	<div></div>
Preferred contact details (email/phone/post)	<div></div>
<u>Organisation (if applicable)</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 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 checked="" 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:

The 'Outcomes' would be better described as 'Aspirations' or even 'Hopes', as the mechanisms for delivering them are either missing or insufficiently robust. The legal framework needs to be strengthened, e.g. by updating the Environment (Wales) 2016 following the declaration of climate emergency. Planning obligations must be enforced in areas like affordable housing and decarbonisation, not just written down and then ignored when developers object, as happens too often today. Unless such steps are taken, then the NDF will have limited effect.

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	Don't know	No opinion
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 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:

NDF claims (p27) that “*The principle of ‘town centres first’ is well established in planning policy in relation to retail developments*” but the existing distribution of retail provision does not support that claim, with many large out-of-town or edge-of-town retail parks across Wales, which both increase dependence on car travel and drain vitality from town centres. The nature of town centres is changing but retail will remain an essential part of the mix and policy should prohibit further retail developments away from town centres and transit hubs.

In cities, the ‘town centre first’ principle should not be interpreted as concentrating facilities in the city centre, worsening congestion by compelling residents to travel into the centre for work or services. The city centre role needs to be supplemented by local centres providing services and employment near to where people live. There is some acknowledgement of this but more needs to be done when approving major edge-of-city developments to ensure they come with both sufficient local provision and adequate public transport to the centre.

NDF rightly recognises that long-term costs of a development must be considered alongside immediate benefits. This should also include assessment and management of the risk that a proposed development will fail, leaving empty

buildings or bills for public authorities. Examples include purpose-built student accommodation that might not be filled (which would be addressed by the proposal to oblige developers to meet residential standards) or cultural assets seen as anchors for regeneration but which do not have credible future business plans even if the initial development can be funded.

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 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 approach the delivery of affordable housing?

A larger role for local authorities and social landlords will be very welcome.

But large private developers must also contribute if affordable targets are to be met. Obligations laid down by local authorities are often not met. In Cardiff, it has become normal practice for the Council to request on-site affordable units or an s106 contribution towards affordable housing only for the developer to claim that would make the proposal unviable, for the District Valuer to confirm that, then for the Council to give in to the threat that the application will be withdrawn, with perhaps a token 'goodwill' payment. PPW states that applications which comply with an up-to-date plan should be assumed to be viable with assessment only in exceptional site circumstances. Unless planning authorities follow this, developers will bid up land prices confident the extra cost will be covered by reduction in their s106 payment. Landowners gain at the expense of those who need homes. NDF should remind planning authorities of this. We will not meet affordable housing targets unless planning obligations are enforced.

As well as requiring more affordable homes, we also need more homes to be accessible for the growing number of elderly or disabled people, and to be built to sustainable standards to meet decarbonisation goals. The award of the 2019 Sterling architecture prize to a high eco-friendly standard council housing project has set a benchmark for Welsh local authorities.

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?

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

There is little sense of the scale or speed at which the infrastructure for ultra-low emission vehicles should be rolled out to meet decarbonisation targets in a climate emergency. Hundreds of thousands of charging points (home, private and public) will be needed across Wales within a decade and that is unlikely to be achieved just by encouragement. Welsh Government cannot “*expect business and industry to drive much of the roll out of charging infrastructure*” (p32) unless it puts in place the legal and regulatory framework to make this happen and enforces that. This could include measures such as denying planning permission for parking provision without

charging points, or a Workplace Parking Levy (as in Nottingham) with reduced rates where charging points are provided. If (as has been suggested) the UK government introduces green number plates, these could be used to refuse access to roads or parking for polluting vehicles.

To “transform the current concepts of private car ownership” (p32) we cannot rely only on technologies such as driverless cars. These will indeed create new possibilities but vehicle automation has encountered significant challenges in recent months and looks likely to take longer to rollout than optimistic predictions suggested. Steps can be taken now to promote car sharing and car pools (e.g. reserved parking spaces for pooled cars) reducing the need to buy a car for occasional use that, once purchased, will be regularly used.

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

The target of "70 per cent of electricity consumption to be generated from renewable energy by 2030" (p36) is not ambitious enough to meet the climate emergency declared by Welsh Government.

Neither tidal energy (mentioned 4 times in the NDF) nor offshore wind (mentioned once) make it into the renewable energy policies. These need to be integrated into the overall energy strategy. The NDF is mainly focused on land use but tidal and offshore generation impacts that, both in its requirements for onshore transmission and in its implications for the demand for onshore generation.

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"/>

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"/>	<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 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.

Regional SDPs are needed but the explanation of the allocation of responsibility among NDF, SDPs and LDPs should be clearer, as there is a risk of contradiction between these. NDF should focus on all-Wales objectives, including inter-regional dependencies, and set SDP objectives for each of the regions to achieve these but not attempt to define how the SDP should do this. Planning decisions should be taken at the lowest level, provided that they meet NDF objectives.

The mechanism by which SDPs will be subject to scrutiny and accountability is not defined. Instead it is just stated that "*The Welsh Government will work with local planning authorities to support the establishment of Strategic Development Plans.*" But how will this work? What is the process by which elected representatives (AMs or Councillors) will be able to exercise control over an SDP on behalf of their constituents? How will citizens or residents have a say? SDPs will have a major impact on how Wales develops over the coming decades and there must be proper democratic processes around these.

Drawing regional boundaries is difficult but there are questions over two of these.

- *South East Wales* is a coherent unit, which maps onto the Cardiff Capital Region.
- *Mid and South-West Wales* is less coherent. Swansea Bay has stronger relationships with South-East Wales than with northern Powys. It is hard to see how decisions on services, housing or infrastructure can be taken at a regional level. NDF acknowledges this problem in its openness to sub-regional plans, which seem unavoidable here.
- *North Wales* also lacks coherence: the A55 and rail offer east-west connectivity but there are marked differences between the east and west of this region, with the east being more urban/industrial, more closely linked with centres across the English border, and with fewer Welsh speakers. Sub-regional plans can play a role here too.

Specifically on South-East Wales:

- Cross-border links with England are not given enough weight (in contrast to statements for the other regions). Cardiff and Newport city councils have supported the 'Western Powerhouse' initiative, the implications of which need to be considered.
- It is good to see the NDF recognise the potential of Newport, where growth could indeed ease development pressure on Cardiff. The strategy for the Valleys is less developed. The NDF identifies Merthyr, Pontypridd, Caerphilly and Bridgend as strategic locations on the South Wales Metro but leave much for the SDP to do to explain **how** these will be developed. This is essential if the Valleys are not to be little more than commuter towns for Cardiff or Newport, placing ever more pressure on congested transport links.
- Transport Oriented Development should not just be about facilitating travel to major centres but should also encourage measures to reduce the need for travel

and to optimise resources so that trains and buses are not overcrowded in one direction only to return empty in the other. Developing Valley strategic locations would help, as do proposals such as St. Mellons Parkway. Poor east-west mid-Valley communications (Pontypridd – Pontypool) are not mentioned.

- The plans to boost Cardiff Airport fit uncomfortably with this year's declaration of a climate emergency by Welsh Government, given the difficulty of decarbonising air travel. NDF states (p62) "*Decarbonising society and responding to the threats of climate change should be central to all regional planning*" but the implications of this for Cardiff Airport (other than access to it) do not seem to have been considered. The airport is important for the Welsh economy but to meet climate targets (which must become more ambitious to meet the emergency) the UK will have to curtail the growth of airports. Rather than regional airports competing to grow, there should be a UK-wide airport plan, otherwise Welsh Government risks investing for passenger growth that will not be sustainable (environmentally or financially) in the face of climate change targets.

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?

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16. Are you...?

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