

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

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

These are good, on point 3 I would recommend is removing the word growth so it became "in distinctive regions that tackle health and socio-economic inequality". This is to avoid growth being used out of context and to consider that by 2040 economic growth is unlikely to be our priority and the pursuit of it can hinder other aims being met.

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	
						X	

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

Planning for ecosystems restoration work and renewable energy, especially hydro should be encouraged. OPD is an impressive model which could help make Wales a sustainability leader.

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?

Neither agree nor disagree

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

More specific measures are suggested. For example, offering land below market rate to small/micro developers who will provide affordable sustainable housing. Therefore creating affordable warmth at scale while booting the local economy.

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?

Don't know

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?

This includes mobile coverage - in the same way we protect national parks we should also have some areas which don't get a full mobile signal. i.e. voice only and not data. Specifically for people with electro-sensitivity.

The rollout of technology should address public needs rather than corporate. For example, Brussels banning 5g for health concerns and there being privacy concerns aswell. I work in innovation and love gadgets, but my mobile data usage is much less than average simply by optimisation on the handset. This can avoid the need for 5g (chinese) mobile infrastructure, lowering costs, security and health risks.

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?

Strongly agree

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				
							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?

The ambition needs to be stepped up. For example, the 70% renewable electricity generation by 2030 isn't consistent with Labour's UK policy of being Zero Carbon by 2030. Zero Carbon Britain being originally suggested in Wales in 2007 at the Centre for Alternative Technology that I worked on (mainly 2007-2010).

Looking more recently.. Offshore wind reaching the milestone of cost competitive with (new) Natural Gas since 2017 and heading for being cheaper than existing gas by 2023. With 2019 contracts signed at under £44 / MWh to be online by 2024, they are much more effective than the BEIS target price of £85/MWh by 2026 which in turn is lower than the subsidy for Hinkley C Nuclear Power at £92.50.

The national grid say they will be ready for 100% renewables by 2025. Therefore renewables not only address climate change but also make our country much more economically efficient, they should therefore be prioritised as an immediate action as part of transition to a sustainable economy.

For district heat networks, utilise heat mapping to prioritise their use. These have been used very well in the Netherlands, despite BEIS scrapping the national heat map, London has separately updated theirs. Wales could do so too. Developments of just 10 houses can benefit both economically and environmentally from a heat network. So I would change the 100 to 10 and consider mandating the use of heat networks. Remembering the 2025 policy of not allowing new domestic connections to the gas grid.

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.

Don't know

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?

Don't know

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?

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?

Don't know

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.

No Response

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 Response

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 Response

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?

The removal of the option to learn in the medium of English for school children locally was quite divisive. Some felt that it decreased the childrens ability to converse in English and disproportionately impacted one part of the community. It also penalised those with special educational needs. These impacts could be mitigated by allowing children to learn in the medium of English and to provide additional support for those with special educational needs.

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?

Thank you, I look forward to a Wales leading the way in addressing climate change for future and current generations.

16. Are you...?

Q24. Are you:

Providing your own personal response

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 Martin Kemp

Organisation (if applicable) -

Preferred contact details (email/phone/post) [REDACTED]

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

[REDACTED]

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

No Response