

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 all of them

2. Spatial Strategy (policies 1 - 4)

Q3. The NDF spatial strategy is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years. To what extent do you agree or disagree with the spatial strategy and key principles for development in...

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

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

No Response

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?

The role of local authorities needs greater emphasis. The Norwich council housing scheme that recently won the Stirling Prize shows what can be achieved. Too often "affordable housing" in the private sector is not affordable for many.

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?

Agree

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?

I would like to add a comment: I welcome the Welsh Government support for the increasing use of ultra-low-emission vehicles and the intention to work with others to ensure the creation of a network of rapid charging points. However, I believe that the intention to "keep under review the pace and geography of the delivery of charging infrastructure... in rural areas" is inadequate and insufficiently proactive.

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						

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?

Regarding Policy 10 I would like to submit the following comments:

I strongly support the proposal to support large-scale onshore wind and solar energy in the identified priority areas and the presumption in favour of development of such schemes and acceptance of some landscape change. This represents a critical and long overdue step forward in reducing Wales' greenhouse gas emissions and meeting ambitions decarbonisation targets that reflect the climate emergency. Although onshore wind remains the cheapest renewable and is supported by a large majority of the population, its deployment has been severely impacted by restrictive local development plans and supplementary planning guidance. This needs to end, and end soon! To cite the example of Anglesey:

- The number of wind turbine/wind farm applications submitted fell from 58 in the period 2010-2012 to just 2 in the period 2016-2018 (data from Freedom of Information responses from Isle of Anglesey County Council).

- The number of those applications fell from 15 in the period 2010-2012 to just 1 in the period 2016-2018.

- The number of those applications for which planning officers recommended approval fell from 16 in the period 2010-2012 to just 1 in the period 2016-2018.

The collapse in onshore wind energy in Gwynedd was no doubt similar, although Gwynedd Council informed me in 2015-6 that they could not supply data.

The reason for the collapse was overly restrictive local planning policy, in the form of (a) the Supplementary Planning Guidance adopted in 2013 on Anglesey and 2014 in Gwynedd and (b) the Anglesey and Gwynedd Joint Local Development Plan, adopted in 2017. The latter states (see Policy ADN 1: On-shore Wind Energy) states that "No Large-Scale or Very Large-Scale wind farms / wind turbines will be permitted in the Plan area" and that "Medium-Scale wind farms / wind turbines will only be granted on urban / industrial brownfield sites or when the proposal involves the repowering of existing wind farms / wind turbines." The consequences of such a prohibitive policy are obvious, and the policy itself is irrational in that it was without doubt formulated in response to a vigorous anti-wind campaign characterised by half-truths and outright lies (a complaint against Anglesey Against Wind Turbines that I took to the Advertising Standards Authority in 2012 was upheld on all ten counts). A fresh approach is therefore entirely warranted, and I welcome the proposals in the Draft NDF, which represent an appropriate response to the climate emergency.

I would also urge Welsh Government to compel local authorities to revisit their Local Development Plans immediately to ensure that they fully reflect the need to support large-scale onshore wind and solar energy in the identified priority areas. While the Draft NDF proposals cover large-scale energy developments above 10 MW, smaller projects will presumably still be subject to the above-mentioned restrictive guidance even if they fall within the priority areas. This paradoxical situation needs to change. We should not be waiting several years (until 2021-2 in the case of the Anglesey and Gwynedd JLDP) before local plans are reviewed and, hopefully, amended. We have had almost a decade of inertia and there is a need to act now.

Regarding Policy 14 – Priority Areas for District Heat Networks, I would point out that Bangor is not included among the priority areas although a proposal emerged from the university a decade or more ago regarding the scope for a district heating network encompassing the university, Ysbyty Gwynedd and other buildings. This should be revisited to assess its potential.

Finally: I could see no space to offer comments on Policy 9 – National Forest. I wish to make the following comment:

I strongly support the proposal to develop a national forest since it will provide both biodiversity and climate change mitigation benefits. A recent report from Harvard Law School (<https://animal.law.harvard.edu/wp-content/uploads/Eating-Away-at-Climate-Change-with-Negative-Emissions%E2%80%93Harwatt-Hayek.pdf>) noted: "Limiting warming to 1.5°C above pre-industrial temperatures with little or no overshoot requires carbon dioxide removal (CDR) from the atmosphere. The most readily deployable CDR option at scale in the UK is the restoration of its native forests. Reforestation could provide the CDR needed to help meet the UK's current climate change commitments, and beyond that, to staying within the 1.5°C budget."

There is, however, a need to consider whether 2000 hectares per annum, as proposed, is sufficient. Forestry Commission figures show that last year 11,200 hectares of new trees were planted in Scotland as compared with only 520 hectares in Wales. While one cannot expect a figure close to Scotland's, it seems legitimate to ask whether the Welsh national forest could be developed more rapidly, with more planting in the early years. This would deliver climate change mitigation benefits at an earlier date.

The draft NDF does not cite a timescale for the development of the national forest, but simply suggests the average of 2000 hectares per annum from 2020. There is a need to "put more meat on the bones".

By what date would completion of the national forest be achieved? How big would it be overall, and would this sit satisfactorily with the 2000 hectares per annum figure? As mentioned above, could planting be frontloaded so that benefits are achieved at an earlier time point? What will be the interconnectivity between the planted areas? How will land use change be affected, and will compulsory purchase be required in addition to grants? If grants are used, can the procedure be streamlined, given that current grant applications for tree planting can be offputting?

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.

Strongly agree

9. North Wales (policies 17-22)

Q15. We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale. To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Agree

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?

Don't know

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?

No Response

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?

I could not see a space for a comment on Policy 22 – North West Wales and Energy. I would like to point out that while Wylfa Newydd is not quite "dead in the water" and Trawsfynydd is of potential interest as a site for a small modular reactor, this policy needs to be refined to shift the emphasis away from nuclear and towards renewables. The focus on nuclear reflects policy over the last decade, but it is now looking outdated.

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

[REDACTED]

Organisation (if applicable)

[REDACTED]

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.

Keep my response anonymous