

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?

Strongly disagree

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with some of them

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

I strongly disagree with the identification of vast swathes of Welsh countryside as priorities for Wind Farm development. While I support Wind among other renewable energy strategies, this should be on a sensitive case-by-case basis taking into account ecological and amenity considerations. In other areas of the UK, offshore wind farming is seen as the future; the framework to put so many wind farms inland is outdated and potentially harmful to Wales' tourist economy and the amenity of local residents. By identifying large areas in the plan, it reverses the planning 'burden of proof', and will be much more difficult for local residents and conservation groups to oppose planning applications. Wind Farms if too large and/or too large in number will alter the landscape where the primary employment to local people after farming is tourism. Inadequate thought has been given to the infrastructure needed to carry power from the wind farms to the National Grid; this would be hugely disruptive, and if on pylons, devastating to the natural landscape. It is not clear whether lighting would be needed, and if so, this would be devastating to the many areas of Wales which already have, or are working to acquire 'Dark Skies' status. Wind farms which are offshore, OR small in scale and sensitively sited (e.g., on brownfield sites, or in unobtrusive places), will always have their place. However, the NDF in its current form represents nothing less than a giveaway to land-grabbing electricity generators, for which local residents will see vanishingly little benefit, and in many cases, positive harm to their own amenity, and to the tourist economy on which the Welsh countryside so heavily relies.

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?

Disagree

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

Make it much easier for individuals to self-build, with strong eco principles.

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?

Neither agree nor disagree

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?

Neither agree nor disagree

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?

No Response

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?

Neither agree nor disagree

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							

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?

Small-scale wind and solar to directly benefit local communities, to be built only with truly meaningful consultation with local communities and environmental stakeholders. Large scale offshore wind. Extension of help with energy efficiency measures to all Welsh residents. Strict eco regulations of all new builds - there is no reason not to have near Passivhaus standards on all new builds. Encouragement of coppicing and other environmentally appropriate forms of biomass (not mass clear-cut felling). Restoring subsidies and removing VAT on rooftop solar panels for homes and businesses. Promotion of individual wind turbines for farms and smallholdings. Promoting lesser-known low-carbon technologies such as ground- water- and air-sourced heat pumps. Putting funding into research into energy conservation and energy generation. Build on Wales' international expert reputation through its universities and Centre for Alternative Technology to improve existing technologies and development of new ones.

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.

Neither agree nor disagree

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?

Agree

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?

Strongly disagree

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.

I agree with the proposals apart from growth of Cardiff airport. Airport expansion harms local residents and the environment, and more affordable train and ferry options would be better. Expanding airports is incompatible with carbon reduction.

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.

The Welsh language should be vigorously supported. Impact on rural communities should take into consideration loss of tourism and loss of amenity from large scale wind farms. Impact on rural communities should involve rigorous monitoring of air quality, especially ammonia. Currently, planning applications for Intensive Poultry Units only take into account projected ammonia - but total ammonia (existing level + addition to total ammonia for proposed new unit) needs to be considered, and a cap should be introduced, so that no new IPUs can be built in areas where ammonia levels are already high.

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?

I am all in favour of taking into consideration impacts on special sites. However, this needs to go even further: the 'special sites' approach ignores the potential of sites not formally designated. Many of these are highly important for biodiversity. It should also be taking into consideration the importance of connectivity between sites important for biodiversity. Corridors of forests and hedgerows linking special sites are arguable key to the special sites' continued existence as rich habitats.

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?

Welsh should be taught in all schools and free Welsh learning opportunities should be provided in every community. Workplaces should be able to hire both English and Welsh speakers, and to provide Welsh learning for primary English language speakers.

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 am concerned by the industrialisation of the Welsh countryside through designation of large swathes as priority areas for Wind Farms. Smaller scale, sensitive wind and solar projects, directly benefitting local communities, accompanied by strict eco standards for new builds, and energy conservation help available to all, would help us to meet our carbon obligations. It is also the height of hypocrisy to be removing subsidies and imposing VAT on renewable energy at the level of the homeowner. Instead, we should be building for a robust carbon-neutral future from the grass roots up - empowering families, farms and communities to produce renewable energy - and only looking at industrial scale wind and solar on a limited, case-by-case basis to top up renewable energy needs.

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) -

Preferred contact details (email/phone/post) email

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