

**From:** [Kay Powell](#)  
**To:** [NDE](#)  
**Subject:** RESPONSE TO CONSULTATION ON dNDF  
**Date:** 15 November 2019 10:20:50

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Dear all - the following response is submitted on a personal basis. I am happy for it to be published.

CHAPTER 3 NDF OUTCOMES: The NDF is the top-level Development Plan for Wales. It would benefit from specific outcomes which are stretching, but achievable. within the term of the plan and and indication of how progress will be measured eg

Outcome 4 could indicate the intermediate 20 year target number of Welsh speakers, and specify that this will be measured by survey;

Outcome 6 could specify the target "value added" (not just GDP) as a percentage by manufacturing, green and service sectors of the economy; and

Outcome 5 could set a target to improve 'liveability' and pollution levels, measured by an all Wales statistically reliable survey for residents and businesses, and air quality monitoring respectively.. ..

#### CHAPTER 4: SPATIAL CHOICES:

(i) Wales' character and distinctiveness is shaped by historic features and landscapes. Chapter 4 should acknowledge this, and should map significant heritage features including current World Heritage sites and areas which could be submitted for such designation in the next 20 years. .

(ii) New developments, existing buildings and all forms of infrastructure need to be modified/located to meet the challenge of the climate emergency. This can't mean "business as usual". I hope that the NDF will set out the national scale development and infrastructure that Welsh Government proposes over the next 20 years and explain the that this is intended to re-focus development patterns and lifestyle choices.

(iii) I wholeheartedly agree with the need to reverse the current trend to urban sprawl, but take issue with the wording (top right of Page 22) which appears to conflate this with new towns. I urge you to rephrase this. The general principle of focusing development on existing urban centres only holds if public transport, health and other facilities can be provided in tandem, and scaled up within months rather than years. Current patterns of development all too often spread along A roads and motorways producing look-alike places and encouraging car use contrary to WG policy goals (sustainability, air quality, health and well-being etc).

Properly planned new towns are one of the crowning achievements of the British Planning system. I hope that the NDF will not rule out setting up a delivery body such as a locally-directed Urban Development Corporation (UDC). In this context the recommendation of the Law Commission to do away with the enabling legislation for UDCs was short-sighted. These bodies don't need to be large, but should be proportionate in size to the development proposed. As well as coordinating delivery such a body could help to restore public trust. One or more locations for planned expansion (eg Newtown) should be considered for inclusion in this NDF. The new WG Land Unit could secure options for the required land before the NDF is published, hence retaining any uplift in land value.

POLICY 1: I hope that the NDF will clarify that references on Page 26 to higher densities

do not necessarily imply high rise development. The latter can lead to multiple environmental and social problems (poor living conditions, lack of amenity space, ground level turbulence, reliance on camera surveillance etc). Too many characterless blocks already blight Cardiff City Centre and threaten to obliterate its Victorian/Edwardian roots. Higher densities can be achieved - and can create high quality, flexible and safe living and working environments - without resorting to high rise development.

Thanks for the opportunity to comment,  
Kay S. Powell