



Welsh Government  
Consultation Report

# Draft National Development Framework

September 2020

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

Our first national development framework will when published be called '**Future Wales – The National Plan 2040**'. This document was prepared prior to publication and uses the name 'national development framework' and 'NDF' throughout. For clarification the references to the national development framework in this document are taken to mean Future Wales – The National Plan 2040.

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# 1. Introduction

- 1.1 The Planning (Wales) Act 2015 requires Welsh Ministers to produce a National Development Framework (NDF) setting out the policies of the Welsh Government in relation to the development and use of land in Wales. The NDF is also identified in the national strategy, Prosperity for All, as a key component of the Government's commitment towards achieving sustainable growth and combatting climate change.
- 1.2 A key stage in the preparation of the NDF is the publication of a full draft. This draft was published and subject to public consultation between 7 August and 15 November 2019.
- 1.3 This consultation report summarises and analyses the feedback provided by respondents, sets out the Welsh Government's response to these, and explains how the responses have influenced and led to proposed changes made to draft NDF policies. The proposed changes are comprehensively presented in a Schedule of Changes, published alongside this document
- 1.4 In addition to the public consultation process, the proposed changes to NDF policies have also been influenced by the work undertaken by two Senedd scrutiny committees: the Climate Change, Environment and Rural Affairs Committee and Economy, Skills and Infrastructure Committee. The [Climate Change, Environment and Rural Affairs Committee](#) considered written submissions and heard oral evidence from stakeholders during meetings on 24 October, 6 November and 14 November 2019. The [Economy, Skills and Infrastructure Committee](#) heard evidence on the 21 November. The Climate Change, Environment and Rural Affairs Committee formed 51 conclusions and the Economy, Skills and Infrastructure Committee formed 8 conclusions for the Welsh Government to address. Welsh Government responses to the conclusions of these committees are set out in Chapters 5 and 6 of this report.
- 1.5 This report is published alongside the draft NDF and will be scrutinised by the Senedd for 60 working days. Following the consideration of any changes recommended by the Senedd, the Welsh Government will seek to publish the final NDF around 4 to 6 months later.
- 1.6 A summary of this consultation report is also available.

## 2. Consultation and Engagement

2.1 We have consulted with and spoken to many people across Wales and invited them to share their views on what the NDF should do and contain. During this process we have gathered extensive evidence to help us shape the plan and determine the policies to help take Wales forward over the next 20 years.

### Five ways of working

- 2.2 The Well-being of Future Generations (Wales) Act 2015 sets out five ways of working which, alongside the Act's well-being goals, are central to the NDF, its consultation, and engagement process. The five ways of working are:
1. **Collaboration** – working with others to meet well-being objectives.
  2. **Integration** - how well-being objectives may impact upon the well-being goals, or on the objectives of other bodies.
  3. **Long term** - balancing short-term needs with safeguarding long-term needs.
  4. **Involvement** – involving others in achieving well-being goals, and that this process reflects diversity.
  5. **Prevention** - acting to prevent problems occurring to help meet objectives.
- 2.3 To complement these principles we set out a series of actions to ensure the preparation of the NDF demonstrated the five ways of working.

**Engagement** – Anyone can get involved and have their say during the preparation of the NDF, and help shape the NDF going forward.

**Consultation** – In August 2019 we formally sought views on the draft NDF we considered should form the development plan for Wales over the next 20 years. Consultation responses will inform the final plan.

**Scrutiny** – Elected members of the Senedd will scrutinise the draft NDF and make recommendations prior to its publication by the Welsh Government.

**Assessment** – It is important we consider the effects and impacts NDF proposals could have on Wales' environment, communities and individuals. An Integrated Sustainability Appraisal (ISA) and Habitats Regulations Assessment (HRA) is key to this process. Everyone has been welcome to comment on the development of these assessments over the draft NDF preparation period. The ISA and HRA reports are available on our website.

### NDF Statement of Public Participation

2.4 The Statement of Public Participation (SPP) is a statutory document outlining how public and other stakeholders can participate in the preparation of the NDF. Each time changes have been made to the SPP they have been subject to consultation and

appropriately advertised. The SPP was first published in November 2016, with revisions in June 2017 and July 2019.

It was further updated in September 2020 following the delay caused by the Covid-19 pandemic.

2.5 The following timetable sets out the stages and timescales for the preparation of the NDF from its inception in 2016 to its planned publication. It shows different stages of the NDF preparation process and when consultation and engagement exercises for these took place. There have been three consultation exercises over this period, at stages 2, 5, and 8:

<b>Stage 1</b>	Prepare Statement of Public Participation	January 2016
<b>Stage 2</b>	<b>Publish and consult on the Statement of Public Participation</b> (12 weeks)	February – April 2016
<b>Stage 3</b>	Consider responses to the Statement of Public Participation consultation and prepare a consultation report	May – Sept 2016
<b>Stage 4</b>	Gather evidence, develop the vision, objectives and options Undertake engagement and Call for Evidence & Projects	Oct 2016 – March 2018
<b>Stage 5</b>	<b>Publish and consult on main issues, options and preferred option, supported by environmental reports and assessments</b> (12 weeks)	April – July 2018
<b>Stage 6</b>	Consider responses to the main issues, options and preferred option consultation and prepare a consultation report	July – October 2018
<b>Stage 7</b>	Prepare draft NDF Undertake engagement	October 2018 – June 2019
<b>Stage 8</b>	<b>Consult on draft NDF</b> (14 weeks)	August - November 2019
<b>Stage 9</b>	Consider responses to the draft NDF and prepare a consultation report	November 2019 – August 2020
<b>Stage 10</b>	Assembly consideration of the draft NDF (60 'sitting' days)	September – November 2020
<b>Stage 11</b>	Publish NDF	February 2021

## Strategy for consultation and engagement

2.6 The purpose of the consultation and engagement campaign during this formal draft NDF consultation stage was multi-faceted. The intention was to disseminate information about the NDF, to collect evidence to support the NDF, to enable stakeholders to discuss issues with Welsh Government officials, to reach all parts of Wales, and to encourage umbrella organisations to inform their members. The consultation was promoted in a variety of ways, including the Welsh Government website, through 1,552 stakeholders registered in the NDF Engagement Consultation database, existing professional and non-professional networks, stakeholder meetings and events, and various media and social media outlets.

## **Responding to the consultation**

2.7 The consultation exercise included the following formal documents:

- the draft NDF (available online and in print)
- an easy-read version of the draft NDF (available online and in print)
- a youth friendly version of the draft NDF (available online)
- a leaflet setting out the background to the NDF and summarising the content of the draft NDF (available in print)
- full and summary versions of the ISA and HRA reports (available online and in print)
- Full and easy-read versions of consultation response form (available online and in print)

2.8 These documents can be viewed on the closed consultation section of the Welsh Government website: <https://gov.wales/draft-national-development-framework>.

2.9 The consultation response forms were provided in an online format to be completed through the Welsh Government website and as pdf/word documents to be emailed to the Welsh Government. The form contained 15 questions, 11 of which relate specifically to the NDF strategy and policies, with the remaining four concerned with impacts on the Welsh language, Integrated Sustainability Appraisal, Habitats Regulations Assessment and further comments.

2.10 The 15 questions related to sections and policies of the draft NDF as shown below.

- |   |   |
|---|---|
| 1. NDF Outcomes   | 9. North Wales (Policies 17-22)               |
| 2. Spatial Strategy (Policies 1-4)                              | 10. Mid and South West Wales (Policies 23-26) |
| 3. Affordable Housing (Policy 5)                                | 11. South East Wales (Policies 27-33)         |
| 4. Mobile Action Zones (Policy 6)                               | 12. Integrated Sustainability Appraisal       |
| 5. Ultra Low Emission Vehicles (Policy 7)                       | 13. Habitats Regulations Assessment           |
| 6. Green Infrastructure (Policies 8 & 9)                        | 14. Welsh Language                            |
| 7. Renewable Energy and District Heat Networks (Policies 10-15) | 15. Further comments                          |
| 8. The Regions (Policy 16)                                      |   |

2.11 The full consultation questions, set out in the consultation response form, can be viewed at the following link: <https://gov.wales/sites/default/files/consultations/2019-10/draft-national-development-framework-consultation-document.pdf>.

2.12 The easy read version of the questionnaire contained the eight following questions:

**Part A – The main points of the NDF**

Our plan is for the biggest developments in Wales to happen in towns and cities – places like Cardiff, Newport, Swansea and Wrexham. We want to make transport clean and make lots of clean energy, to help improve our environment.

1. Do you think we are aiming to do the right things with our plan?
2. We have 10 aims in the NDF. Should we think about anything else?
3. Do you think the plan will help achieve healthy and well-planned places?
4. Do you think the plan will help us take care of our environment?

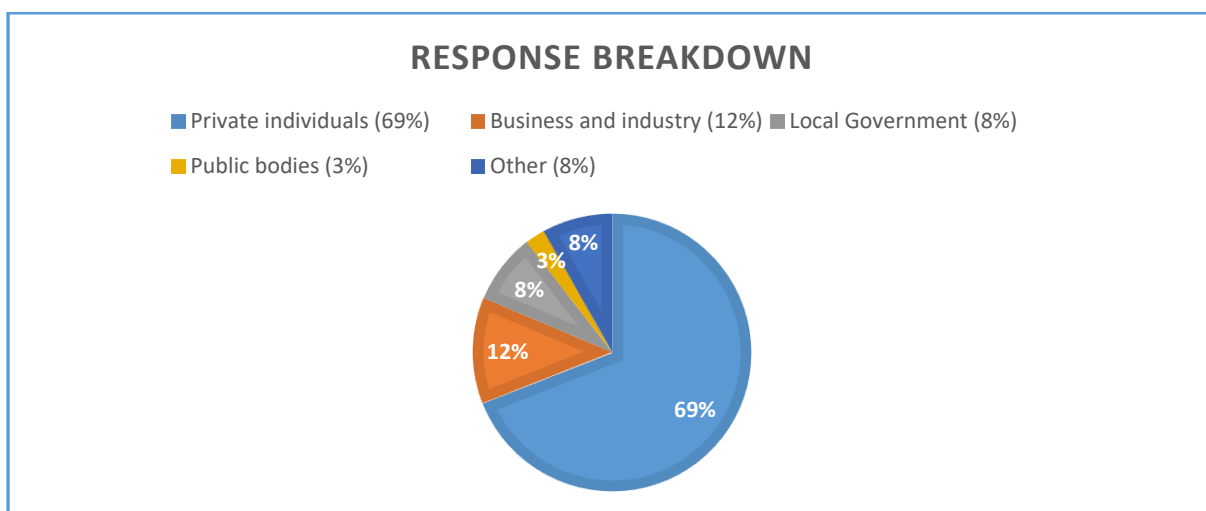
**Part B – Different parts of Wales**

We have plans for the three regions in Wales to help them grow. You can tell us what you think about these ideas - even if you live or work in a different area.

5. Do you agree with our plans for North Wales?
6. Do you agree with our plans for Mid and South West Wales?
7. Do you agree with our plans for South East Wales?
8. Do you have any further comments?

2.13 The total number of responses to the consultation was 1,088.

2.14 The breakdown of all 1,088 responses by respondent type was as follows:



**Ways in which the Welsh Government engaged**



2.15 In addition to the views expressed via the response forms, the Welsh Government proactively engaged with various groups and individuals to further disseminate and gather information. This included drop in sessions throughout Wales, conference events and meetings with various stakeholders. Whilst a specific exercise to consult and engage took place in relation to the draft NDF, consultation and engagement has been ongoing in various forms since 2016.

2.16 Eleven drop in sessions, where stakeholders made appointments to discuss the draft NDF with Welsh Government officials, were held across Wales at the locations listed below. Approximately 125 appointments were arranged. The locations were:

Aberystwyth	Colwyn Bay	Newtown
Bangor	Llandrindod Wells	Swansea
Cardiff	Merthyr Tydfil	Wrexham
Carmarthen	Newport	

2.17 A further 21 meetings and events took place with various organisations and stakeholders, including:

- Welsh NHS Confederation
- National Infrastructure Commission for Wales
- South Wales Landscape Liaison Group
- Planning Officers Society Wales
- Welsh Language Partnership Council
- Renewables UK
- Welsh Language Commissioner
- RSPB Cymru
- North Wales Planning Officers Group
- NHS Specialist Estate Services
- Growing Mid Wales Partnership Board
- Public Health Wales
- Clwydian Range and Dee Valley AONB Partnership
- South East Wales Planning Officers Group
- The Great Inter-Professional Debate
- Pembrokeshire County Council
- Launch of Education Resource Packs
- RTPI Young Planners
- RTPI North Wales Chapter
- RTPI Cymru - National Eisteddfod

2.18 The full NDF Engagement Plan, detailing all meetings and events since 2016, can be viewed on the Welsh Government website:  
[https://gov.wales/sites/default/files/publications/2020-02/national-development-framework-engagement-plan\\_1.pdf](https://gov.wales/sites/default/files/publications/2020-02/national-development-framework-engagement-plan_1.pdf)

## Education Resources

2.19 We produced a series of resources and toolkits for schools to help develop learners' understanding of planning in Wales, including the NDF. Particular efforts have been made to engage with young people, to seek their views and to produce documents aimed at this important audience. We worked closely with *Children in Wales*, an organisation that focuses on engaging with national and local governments on issues of importance to young people. This engagement directly helped with the development of the education resources<sup>1</sup> and the young people's summary version of the NDF.

## Media Engagement

2.20 There were more than 16,000 hits on the draft NDF Consultation webpage between August and December 2019. There were a further 3,750 views of the NDF animations on YouTube, while the Welsh Government Twitter account publicised the consultation to its 90,000 registered followers.

2.21 There were news articles on the BBC website, the Western Mail and Daily Post, in local newspapers and sectoral magazines such as Planning, Welsh Housing Quarterly, and Cynllunio.

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<sup>1</sup> <https://hwb.gov.wales/repository/discovery/resource/7fd63088-bf14-444b-8cfa-e8453dd661b6/en>  
<https://hwb.gov.wales/repository/discovery/resource/dc719db0-de38-4516-8122-d9d9d69441c6/en>

### 3. Structure of the report

- 3.1 The Welsh Government received 1088 comments in response to the public consultation process, all of which have been read, analysed and considered.
- 3.2 The analysis and categorisation of consultation responses has been undertaken on behalf of the Welsh Government by Strategic Research and Insight Ltd (SRI). The report provided by SRI to the Welsh Government forms the significant portion of Chapter 4 of this consultation report.
- 3.3 While the SRI report is central to Chapter 4, the Welsh Government has been wholly responsible for the assessment of responses and any decisions concerning changes to the draft NDF resulting from this process.
- 3.4 The assessment of responses is divided in to sub sections as described in paragraph 3.5 below. Each subsection relates to one question from the full questionnaire and the corresponding question in the easy-read questionnaire. Existing draft NDF policies are grouped accordingly under relevant questions. Any new policies resulting from responses to these questions are either grouped under relevant questions or are listed under Question 15, which is a catch all for all other issues. In this report, Question 15 appears after Question 11 because it is related to the preceding text.
- 3.5 Each sub-section in Chapter 4 includes the following components:
  - **Consultation question**
  - **Statistics**  
Chart and table showing the degree of agreement and disagreement with the question, where a clear answer using a response form was provided (for both full and easy-read questions)
  - **Main themes raised by respondents**  
Tables highlighting the main topics and issues of concern, following a detailed coding exercise
  - **Commentary on main themes**  
A more in-depth look at respondents comments, including quotes from consultation responses
  - **Easy-read themes (where this is applicable)**  
A description of the main topics and issues of concern raised by respondents using the easy-read form
  - **Easy-read commentary (where this is applicable)**  
A summary of respondents' comments
  - **Submissions by respondents not using a response form**

In addition to responses which were received via the main and easy-read consultation questionnaires, free-form submissions were also received by post and email. Submissions have been reviewed thematically in a summary format, in order to identify common themes as well as unique points of view, and some have been quoted to highlight their main arguments and any alternative proposals. Each consultation question in Chapter 4 includes a written submission section incorporating relevant text.

The submissions naturally fell into the following categories: those which were primarily concerned with energy proposals in Powys, those concerned with energy proposals generally or elsewhere in Wales, and those which raised other points relating to the NDF generally.

- **Standardised responses (where this is applicable)**

The consultation responses included three sets of standardised responses. The numbers of times these were submitted and a summary of their concerns are presented within Chapter 4.

Petitions and standardised responses are important indicators of public sentiment and may capture points of view that haven't otherwise been expressed via the consultation questionnaire. Nevertheless, very little information was shared with Welsh Government about how these responses were collected, what information the respondents had access to prior to submission, and whether each response was unique or the result of duplication by particularly motivated respondents.

- **Welsh Government response**

Explains where revisions have been made to the draft NDF policies and explanatory text. It also includes reference to new policies where applicable.

- **Cross-reference to Climate Change, Environment and Rural Affairs Committee and Economy, Skills and Infrastructure Committee**

Shows where the consultation revisions to the draft NDF respond to the recommendations of the CCERA committee and the EIS committee.

## 4. SUMMARY OF RESPONSES TO THE CONSULTATION AND WELSH GOVERNMENT REPLY

### 4.1 NDF OUTCOMES

#### *Full response form Question 1 and easy-read question 2*

4.1.1 Question 1 concerns NDF Outcomes, and is split into two parts, Q1.1 and Q1.2. It is followed by respondent statistics, a table of main themes, and a commentary. Easy-read Q2 is set out below.

#### **Question 1**

The NDF has proposed 11 outcomes as an ambition of where we want to be in 20 years' time.

Q1.1 Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

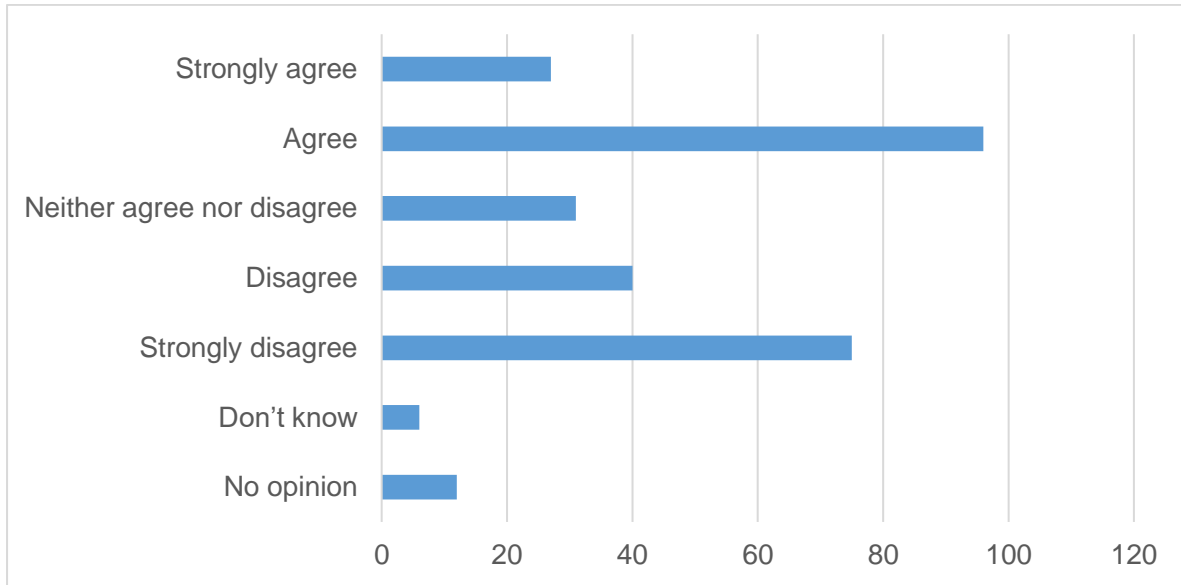
Q1.2 To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

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

#### **Question 1 – Statistics**

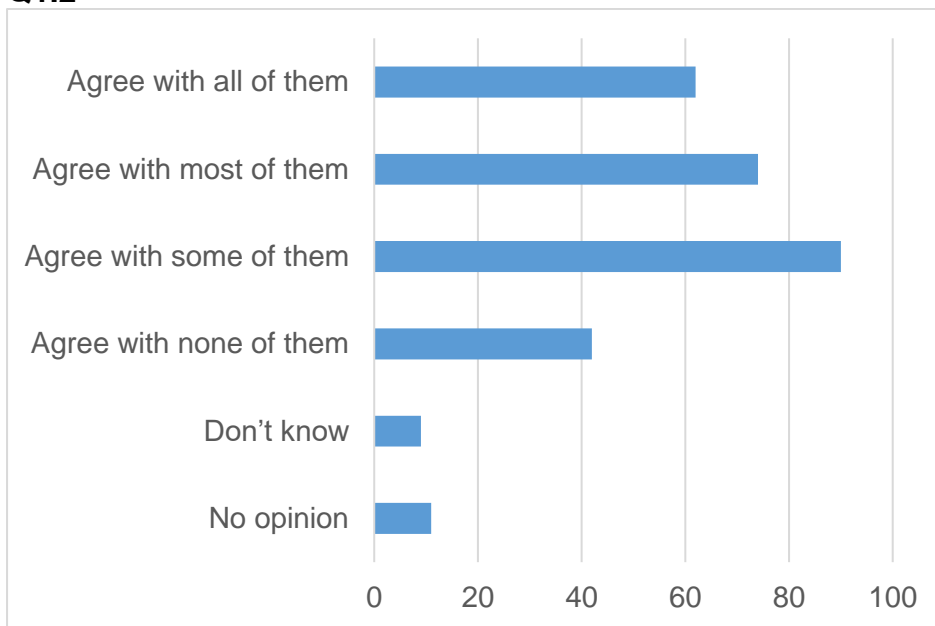
4.1.2 Charts Q1.1 and Q1.2 below show the number and extent to which respondents agree or disagree with questions 1.1 and 1.2 respectively. The associated tables show the number and percentages of respondents expressing a view.

**Q1.1**



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion	Total
Number	27	96	31	40	75	6	12	287
Percentage	9	33	11	14	26	2	4	100

**Q1.2**



	Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	Don't know	No opinion	Total
Number	62	74	90	42	9	11	288
Percentage	22	26	31	15	3	4	100

## Question 1 - Main Themes

4.1.3 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment.

Theme	Code	Count
<b>Wind/solar developments</b>	Damage to the countryside/ecological impacts e.g. danger to wildlife/environmental damage/should not be an 'acceptance of change' to landscape	<b>103</b>
<b>Local democracy/decision making</b>	Plans oppose local decision making/want local consultation and decision making/ability to object to new wind developments/to object on grounds of impact to landscape	<b>81</b>
<b>Wind/solar developments</b>	Area too large/reduce the scale of wind farm plans	<b>78</b>
<b>Plans lack detail</b>	Too broad/idealistic/need to be more action orientated/measurable/generally lack detail or clarity	<b>58</b>
<b>Alternative energy provision</b>	Government should consider offshore wind farms or tidal power/biomass/nuclear power	<b>37</b>
<b>Outcomes</b>	Outcomes contradict one another/which outcomes have greater priority/decarbonisation or biodiversity and urban growth are incompatible/vibrant rural places contradict with wind farms	<b>35</b>
<b>Transportation</b>	Transport networks unable to cope with new developments/will cause an increase in traffic/need more investment in public transport e.g. to cut emissions	<b>33</b>
<b>Rural areas</b>	Not enough detail or emphasis given to rural communities in plans/how will rural communities be supported for growth/not enough mention of agriculture industry/too much emphasis on urban areas	<b>32</b>
<b>Wind/solar developments</b>	Concerned about visual impact/ turbines will be too large/infrastructure too intrusive/tourism will be discouraged affecting the local economy/introduce buffer zones to reduce visual impact	<b>31</b>
<b>Non-specific</b>	Unsure if the plans are feasible/won't happen in reality	<b>31</b>
<b>Plans lack detail</b>	Need greater emphasis on tourism industry/how will tourism industries be protected e.g. in Mid Wales	<b>28</b>
<b>General support</b>	Generally agree with the plans/agree with most of the plans/the outcomes in principle	<b>27</b>
<b>Climate change</b>	Need greater emphasis on decarbonisation/the climate emergency/future effects of climate change/Outcome 11 should take priority over other outcomes	<b>25</b>
<b>Energy transportation</b>	Concern about how to connect rural wind/solar farms to the national grid/infrastructure necessary to transport the energy	<b>24</b>
<b>Plans do not go far enough</b>	(Non-specific) e.g. plans aren't ambitious	<b>21</b>
<b>Policy alignment</b>	NDF needs to align with other policies/strategies e.g. PPW, Well-being of Future Generations Act	<b>20</b>
<b>Evidence base</b>	NDF lacks an evidence base / consideration of contrary evidence to make it robust	<b>12</b>

<b>Scale issues</b>	Policy gap between NDF and SDPs/LDPs will raise tensions (policy status)/clarify relationship to SDPs/LDPs	<b>12</b>
<b>Wind/solar developments</b>	Impact to health/wellbeing	<b>11</b>
<b>Welsh Language</b>	Disagree with proposals for the Welsh language/Welsh language should not be a priority/Welsh speaking targets are unrealistic	<b>11</b>
<b>Additional outcome</b>	Housing should be an outcome in its own right/quality housing	<b>11</b>
<b>General opposition</b>	Generally oppose renewable energy proposals/large scale developments/proposals are unnecessary	<b>9</b>
<b>Wind/solar developments</b>	Wind/solar won't produce enough electricity to match demand/aren't reliable/efficient/costs will be greater than energy output/will need back-ups/benefits will be minimal	<b>8</b>
<b>Viability</b>	Requires funding commitment/fair funding to be successful	<b>8</b>
<b>Additional value</b>	Culture, heritage and the environment have value outside of economic/needs more emphasis on culture/heritage/include heritage as an outcome	<b>8</b>
<b>Housing</b>	Involve housebuilders/private sector in house building/NDF doesn't involve private sector enough	<b>8</b>
<b>Housing</b>	Concerned about the environmental damage of housebuilding/new houses should be eco-friendly/carbon neutral/energy efficient/use green energy sources/existing stock should be retrofitted	<b>8</b>
<b>Housing</b>	Not enough focus on those who do not qualify for affordable housing/house prices unaffordable/should not be a focus on subsidised housing	<b>8</b>
<b>Housing</b>	Local amenities need to be considered/improve local infrastructure when house building	<b>7</b>
<b>Viability</b>	Requires joined up working e.g. between Welsh government and LAs	<b>7</b>
<b>General opposition</b>	Generally disagree with proposals/don't think they will make a positive difference (non-specific)	<b>7</b>
<b>Plans lack detail</b>	On flood management/insufficient emphasis on flood risk over life span of the NDF e.g. in coastal communities/consider reforestation to combat flooding	<b>7</b>
<b>Financial</b>	Need to consider costs/cost of proposals not included in NDF plans	<b>6</b>
<b>Mid and South West Wales region</b>	Disagree with grouping of rural mid-wales and Swansea/rural mid-wales communities should be considered as a separate entity	<b>6</b>
<b>Housing</b>	Concern about house building on the greenbelt/damage to green areas	<b>5</b>
<b>Outcomes</b>	NDF too broad/outcomes fall outside of the remit of planning/outside of WG control	<b>5</b>
<b>Monitoring</b>	NDF needs to include a monitoring process	<b>5</b>
<b>Additional outcome</b>	Air quality should be an outcome/requires more emphasis	<b>4</b>
<b>Joint working</b>	NDF needs to align with other UK/Global energy/climate policies	<b>4</b>
<b>Alternative outcome</b>	Biodiversity protection and recovery	<b>4</b>



<b>Alternative outcome</b>	Economic growth	<b>4</b>
<b>Local democracy/ decision making</b>	Request greater engagement with local authorities/ representative bodies/local authorities should decide wind farm placements	<b>3</b>
<b>Plans lack detail</b>	Maps inadequate for decision making/need more detailed maps/need population map/contains errors or inaccuracies	<b>3</b>
<b>South East Wales region</b>	Too much emphasis on Cardiff/Cardiff gets all the benefits/funding	<b>3</b>
<b>Sustainability</b>	Stronger / deeper focus on sustainability needed	<b>3</b>
<b>Joint working</b>	Needs a more joined up Infrastructure plan e.g. consider beyond borders (flows)	<b>3</b>
<b>Economy</b>	Additional financial costs of large-scale wind/solar developments haven't been considered e.g. impacts to community/disruptions/roadworks/road widening/strain on services	<b>2</b>
<b>Wind/solar developments</b>	Increasing energy costs / cost of installing wind turbines	<b>2</b>
<b>Mid and South West Wales region</b>	Plans disproportionately impact mid-Wales/mid-Wales not being listened to	<b>2</b>
<b>Scale issues</b>	Importance of allowing for geographical differences when making policy	<b>2</b>
<b>Greenbelt sites</b>	Greenbelt sites should be able to be developed on	<b>2</b>
<b>Alternative outcome</b>	Health and wellbeing	<b>2</b>
<b>Policy</b>	Need to learn from other planning policies that have had opposition/that haven't worked e.g. Tan8	<b>2</b>
<b>Planning</b>	Need to use a variety of different planning techniques in parallel	<b>2</b>
<b>Rural</b>	Sensitive development required to protect character of rural Wales	<b>2</b>
<b>Decarbonisation</b>	More innovative solutions to decarbonisation needed/decarbonising transport	<b>2</b>
<b>Housing</b>	Increase the role of housing associations/local authorities in house building	<b>1</b>
<b>Welsh Language</b>	Agree that Welsh language should be considered/feel learning/use of Welsh language should be encouraged	<b>1</b>
<b>Alternative outcome</b>	Equality of access to green space	<b>1</b>
<b>Alternative outcome</b>	Education	<b>1</b>
<b>Wording</b>	Language use makes it sound as though urban dwellers aren't entitled to homes, jobs etc.	<b>1</b>
<b>Other (unspecified)</b>		<b>74</b>

### Question 1 - Commentary

4.1.4 The following section is a more detailed commentary on concerns expressed by respondents. It also includes selected quotes from respondents, presented in italic, reinforcing those views.

Respondents were initially asked whether they agreed or disagreed that the outcomes presented are a realistic vision for the NDF, and whether they agreed with all, most, some or none of the ambitions overall. When asked to explain any reasons for disagreement with the NDF's 11 outcomes, responses most frequently focussed on the proposals for wind energy development. In particular, respondents were most concerned about the potential that wind energy developments could cause damage to the local rural landscapes, including damage to the environment and impact to wildlife such as birds. Several of these responses took specific issue with the term "acceptance of landscape change" in the NDF.

*Also no mention of the damage to the ecosystems involved with the enormous amount of land proposed for these projects.*

*This proposed large-scale destruction of one the UK's most beautiful and environmentally important areas is completely inappropriate and totally unacceptable and tragically, totally irreversible. The many thousands of tourist visitors numbers, for example, on which many livelihoods and local economies depend, would be greatly reduced as a consequence of the disappearance of this unique and natural resource that they visit to celebrate.*

*The Mid Wales landscapes should be protected and biodiversity enhanced. An acceptance of landscape change as set out in the proposals is entirely unacceptable. One in 4 jobs are based on tourism - our rural economy supports thousands of businesses and jobs that are dependent on the scenic mid wales landscapes.*

Linked to this was a perception that decisions on landscape change were not taking into account local decision making. 81 respondents felt that they should be able to object to specific wind turbine proposals in their area or that there should local consultation on a development-by-development basis. As part of this decision making, many wanted the ability to object to turbine development on the basis of its impact on landscape. A smaller number felt that the decision should rest with local authorities, or involve other local representative bodies.

*Local councils should determine Wind Energy applications, and applications should have the backing of local communities to be approved. It is unacceptable that applications in Wales are determined through a decision by Welsh Government Ministers and not local authorities. It is undemocratic, local people should be making planning decisions.*

*It is not actually the Outcomes I disagree with... it's the action intended and processes of implementation that are seriously faulty in some key respects e.g. ignoring local democratic decisions.*

*People objecting are informed that they can no longer object to landscape impact/change -which suggests that there would be no democracy - a plan with no democracy, is not an acceptable plan.*

A large proportion of respondents felt the area identified for potential wind farm development was too large, or requested that the total area be reduced.

*Too great an area of land proposed for onshore wind/solar projects - considerably reduce area proposed*

Comments raised issues not only with the area taken up by wind turbines themselves, but also the land that would need to be used to support the infrastructure associated with them.

*This would be an unfair system, especially considering the substantial area of land involved and the size of the infrastructure involved.*

Several comments suggested that some people had interpreted plans to mean that a fifth of the landmass of Wales would have turbines built upon it.

*[I]f the plan suggests they could cover up to 1/5 Wales, then this would be a significant impact. It is not acceptable that objections about impact on landscape are not "accepted" even though this is one of the main objections worldwide to the massive RE sites.*

Instead of onshore wind and solar developments, 37 respondents made suggestions for alternative energy generation. Most frequently, offshore wind developments and tidal power were suggested, with suggested locations including Colwyn Bay lagoon, and the North Sea. Others suggested new nuclear power stations.

*I am all for off shore wind farms and underwater energy, but why spoil the scenery here on Anglesey.*

*Put them offshore if they have to have them here or preferably use the tidal energy which we have, less harm full to the environment and less intrusive to our island residents*

*If you have carbon free nuclear power you don't need any intermittent wind or solar since nuclear plant run 24hours 7 days a week.*

More generally, others felt that the NDF outcomes lacked detail in some way, either that they were too broad or idealistic, or felt that they needed to have measurable outcomes or be action orientated as opposed to 'aspirational'. Others made general comments that there wasn't enough detail or clarity in the plans.

*They are far too general and will be affected by many other events both global and local, the planning process alone will not be enough to achieve the goals that have been set.*

*We do have concerns that none of the issues which aim to be tackled are mapped in order to show where there is need for improvement, this would give a more strategic overview of where resources need to be focused. Sustrans believe that there will be more likelihood of achieving the 11 Outcomes if there was a clear strategy to show how they filter down into other relevant Government policies.*

*The **outcomes are clearly idealistic** with only some influenced by the planning system (emphasis added). If they are left in the current form they can only be considered as aspirational and knowingly unachievable. The outcomes are not informed by a robust evidence base to demonstrate how they would be viable and deliverable. This must be the process otherwise it could place the lower tier development plans of the SDPs and LDPs in impossible situations of being able to conform with unrealistic outcomes put forward in the NDF.*

Other respondents felt that some of the NDF's outcomes contradicted one another. In particular, there was seen to be potential conflict between outcomes aimed at growth and

development and those aimed at sustainability, developing vibrant rural communities or achieving decarbonisation. Again, this was often in regard to the impact of wind farms on rural communities.

*Whilst most of the outcomes are desirable in and of themselves, there is no recognition of the potential conflict between the objectives, for example, outcomes 2, 10 and 11 could be directly in conflict with respect to land use planning. Wales' unique rural character could be destroyed by the over use of industrial scale solar and wind farms in order to fulfil the decarbonisation ambitions.*

*We also have concerns that the Outcomes identified within the draft NDF are conflicting in nature. For example, they seek to promote the delivery of economic development and affordable housing while at the same time as protecting greenfield land and recovering lost biodiversity. No recognition is provided that the Outcomes are interlinked and potentially contradictory in nature, or how such conflicts are to be resolved*

Other common themes were transport, the impact of the proposals on rural areas, tourism, and other comments relating to housing and wind farms. More general comments were those which registered general opposition to the plans or felt that they were unfeasible. These tended to be non-specific about the areas they disagreed with or felt were unlikely to succeed. Others showed general support for the proposals, typically agreeing that the principles overall were supported, while caveating some specific concerns with particular proposals.

### **Easy-read Question 2**

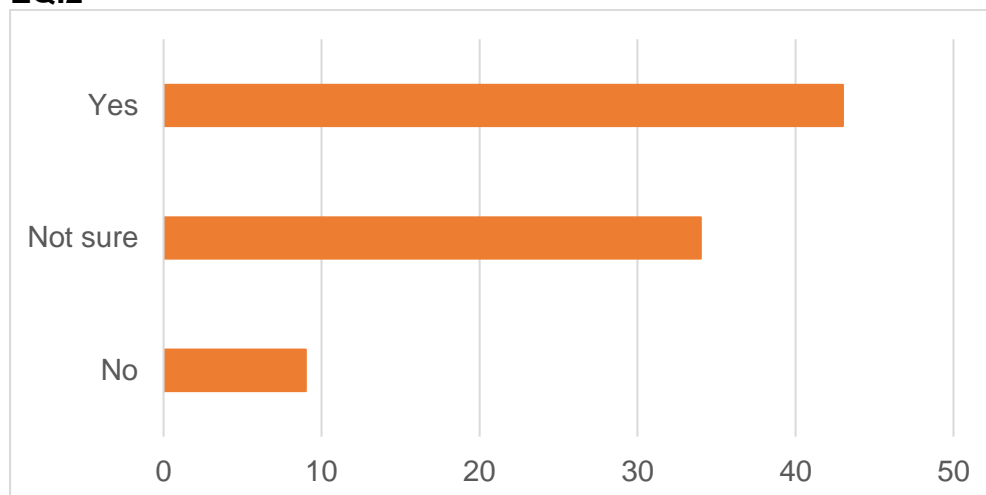
Easy-read question 2 corresponds with question 1 of the full questionnaire about Outcomes.

Q.2 Do you think we are aiming to do the right things with our plan?

### **Easy-read Question 2 - Statistics**

4.1.5 Chart EQ.2 shows the number and extent to which respondents agree or disagree with question Q.2. The table shows the exact number and percentage of respondents expressing a view.

## EQ.2



	Yes	Not Sure	No	Total
Number	43	34	9	86
Percentage	50	40	10	100

### Easy-read Question 2 - Main Themes

4.1.6 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment.

Theme	Code	Count
<b>Wind/solar developments</b>	Damage to the countryside/ecological impacts e.g. danger to wildlife/environmental damage/should not be an 'acceptance of change' to landscape	<b>12</b>
<b>Alternative energy provision</b>	Government should consider offshore wind farms or tidal power/biomass/nuclear power	<b>11</b>
<b>Economy/tourism</b>	Plans will result in negative impacts to the economy or tourism industry/tourism should be prioritised	<b>11</b>
<b>Local democracy/decision making</b>	Plans oppose local decision making/want local consultation and decision making/ability to object to new wind developments/to object on grounds of impact to landscape	<b>4</b>
<b>Wind/solar developments</b>	Impact to health/wellbeing	<b>3</b>
<b>Wind/solar developments</b>	Disagree with use/building of wind turbines/wind turbines spoil areas of natural beauty	<b>3</b>
<b>Housing</b>	Concerned about the environmental damage of housebuilding/new houses should be eco-friendly/carbon neutral/energy efficient	<b>3</b>
<b>Accessibility</b>	Needs to be greater consideration given to accessibility for public spaces e.g. town centres/Cardiff Airport. /improve wheelchair access/easy read signs/take people with additional learning needs into account	<b>3</b>
<b>Viability</b>	Unsure if the plans are feasible/won't happen in reality	<b>2</b>
<b>Economy</b>	Jobs/well-paying jobs/jobs for Welsh people should be a priority	<b>2</b>

<b>Agriculture</b>	Impact on agriculture a concern	<b>2</b>
<b>Transportation</b>	Transport networks need improving generally e.g. more road networks	<b>2</b>
<b>Regions</b>	Too much emphasis on South East/Cardiff	<b>2</b>
<b>Mobile Action Zones</b>	Agree there is a need for better mobile phone coverage/have experienced poor coverage/all of Wales should be an action zone for improvement/enforce universal service/coverage for minority areas	<b>2</b>
<b>General opposition</b>	Generally disagree with proposals	<b>1</b>
<b>Greenbelt</b>	Additional areas should be designated greenbelt/AONBs/protected from development e.g. wind and solar	<b>1</b>
<b>Housing</b>	Needs to be greater rural development/should not be so much restriction on building on greenfield sites	<b>1</b>
<b>Energy transportation</b>	Concern about how to connect rural wind/solar farms to the national grid/infrastructure necessary to transport the energy	<b>1</b>
<b>Plans lack detail</b>	General (non-specific)	<b>1</b>
<b>Electric Vehicles</b>	Suggestions for roll out of electric vehicles e.g. sound, solar technology	<b>1</b>
<b>Rural areas</b>	Not enough detail or emphasis given to rural communities in plans/how will rural communities be supported for growth/too much emphasis on urban areas	<b>1</b>
<b>Other (unspecified)</b>		<b>8</b>

### Easy Read Question 2 - Commentary

4.1.7 The following section is a more detailed commentary on concerns expressed by respondents. It also includes selected quotes from respondents, presented in italic, reinforcing those views.

Three themes came up repeatedly, and to a substantially greater extent than any others, when respondents were asked whether there was anything in addition to the 10 aims which should be thought about. All three of these themes related to wind and solar developments. As was repeated elsewhere, respondents referred to the value of nature for the enjoyment and wellbeing of residents and visitors and felt that the placement of wind turbines would spoil the character of the area used for this purpose and ultimately discourage tourists.

*Saving the land for future generations would be a good place to start. People need to be able to experience nature firsthand not in an imitation city park.*

*Preserving undeveloped open land not industrializing it with environmentally damaging wind turbines.*

*...the impact on the well-being of the residents of Anglesey as they face a fight to maintain the environmental beauty of their island.*

Respondents suggested instead that alternative energy sources should be used to preserve the rural character and 'flora and fauna' of rural mid-Wales and Anglesey, in particular tidal energy.

*A Wales that keeps its identity, beauty and is not industrialized by 250m high wind turbines. A Wales that makes best use of its coast to generate clean under sea energy.  
Tidal, the tides are reliable unlike the wind*

## Written Submissions

4.1.8 The following consultation responses were provided as written submissions and did not use either a full or easy-read questionnaire.

### **The NDF's outcomes are problematic**

A group of responses centred around criticisms of the NDF outcomes for not being achievable. Some saw the outcomes as too general and not measurable while others suggested they were just vague statements of fact or aspiration. Another criticism was that the outcomes lacked detail. A final criticism was that outcomes were too ambitious.

In terms of wording, there was a suggestion that outcomes contained too much jargon and technical language which made them inaccessible to some people. One person said that the final policy needed to be more strongly worded.

There was a fair amount of criticism of the NDF outcomes for being contradictory. In particular, there was seen to be a tension between the decarbonisation agenda and the development agenda.

*It is obvious that Policy 32 on expanding Cardiff Airport is incompatible with much of the content of the draft NDF. Anyone can see that expanding the capacity of that airport, which is failing to compete well with others such as Bristol across the English border, is directly at odds with the statement by the Welsh Government that "we are committed to decarbonising Wales"*

*The expansion of Cardiff airport does little to offset a carbon footprint – quite the reverse. Why should the rest of rural Wales pay for this extended carbon footprint by having so called carbon saving windfarms?*

*...the pursuit of policy that may potentially involve the felling of more trees [i.e. building renewable energy infrastructure], is completely contrary to the goals which form the basis for the ideology upon which the NDF is based.*

There were also suggestions that outcomes should have alternative focuses including: economic; health and wellbeing; education and transportation.

## Welsh Government Response – NDF Outcomes

The Welsh Government's reply in this section covers both Question 1 of the full questionnaire and Question 2 of the easy-read questionnaire, and the written submissions.

- 4.1.9 The NDF Outcomes will be retained in the same broad format as set out in the draft NDF. They encompass the development types that the planning system directly influences and issues where planning can create conditions that encourage the Welsh Government's wider aspirations to be achieved. They are shaped by the long-term challenges and opportunities identified in Chapter 2. The Outcomes are a collective 20-year vision and are a direct influence on the policies that follow in Chapters 4 and 5.
- 4.1.10 The proposed changes should improve the wording and clarity of the NDF outcomes. They respond to specific consultation responses with regard to placemaking, housing, climate change, flood risk, geodiversity and the Welsh language. The rationale for these changes is to enhance the coordination of the NDF with Planning Policy Wales, ensure they are comprehensive in their coverage of land-use priorities and to reflect other proposed changes made at this stage. We are proposing to amend the presentation of the Outcomes to improve the readability of this section of the NDF. The table showing the relationship between the NDF Outcomes and policies, presented at page 70 of the draft NDF, will be updated to reflect the amended Outcomes and policies.
- 4.1.11 We intend to outline the monitoring framework for the NDF in Chapter 3, immediately after setting out the NDF Outcomes. This will ensure there is a clear link between the overall vision for the NDF and measuring actual change over the plan period. The Outcomes have been described by some as idealistic and overly aspirational, and by others as lacking ambition or boldness, which demonstrates the difficulty in setting a vision that meets all expectations. It is our aim for the Outcomes to be ambitious, and to be dynamic and continuous – there may not be an 'endpoint' where they have been achieved, but it is important that we can demonstrate clear progress is made against each outcome over the plan period.
- 4.1.12 The consultation responses included some concern regarding potential conflict between the Outcomes. The planning system is a mechanism for managing competing development ambitions and for mitigating the impacts of land-use choices on society and the environment. The Outcomes consolidate this role, by setting out the range of issues that must be considered when planning new developments and setting land-use policies. Further, we do not agree with the suggestion by some respondents of an inherent conflict between economic and environmental ambitions. The Welsh Government has published in *Prosperity for All: a low carbon Wales* a long-term vision for sustainable economic development that recognises both the challenges and opportunities of developing a vibrant, decarbonised economy.



The proposed changes address Conclusions 1, 8, 9 and 20 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.

## 4.2 NDF SPATIAL STRATEGY

### ***Full response form Question 2 and easy-read questions 1 and 3***

4.2.1 Question 2 of the full questionnaire is concerned with NDF Spatial Strategy and draft Policies 1-4. The question is split in two, the first question relates to draft Policy 1 Sustainable Urban Growth, draft Policy 2 Supporting Urban Centres, and draft Policy 3 Public Investment, Public Buildings, and Publicly Owned Land. The second question relates to draft Policy 4 Supporting Rural Communities. The questions are followed by a set of statistics and commentary. Easy-read questions Q1 and Q3 corresponding to these Policies 1-4 are presented further down this section.

#### **Question 2**

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.

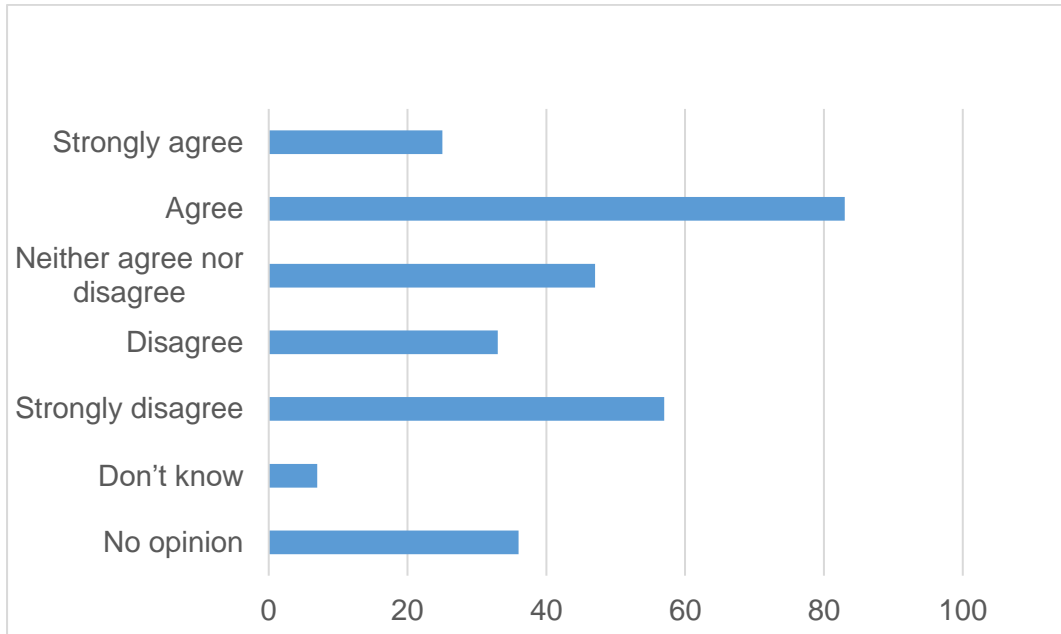
Q2.1 To what extent do you agree or disagree with the spatial strategy and key principles for development in Urban Areas (Policies 1-3)

Q2.2 To what extent do you agree or disagree with the spatial strategy and key principles for development in Rural Areas (Policy 4)

#### **Question 2.1 and 2.2 - Statistics**

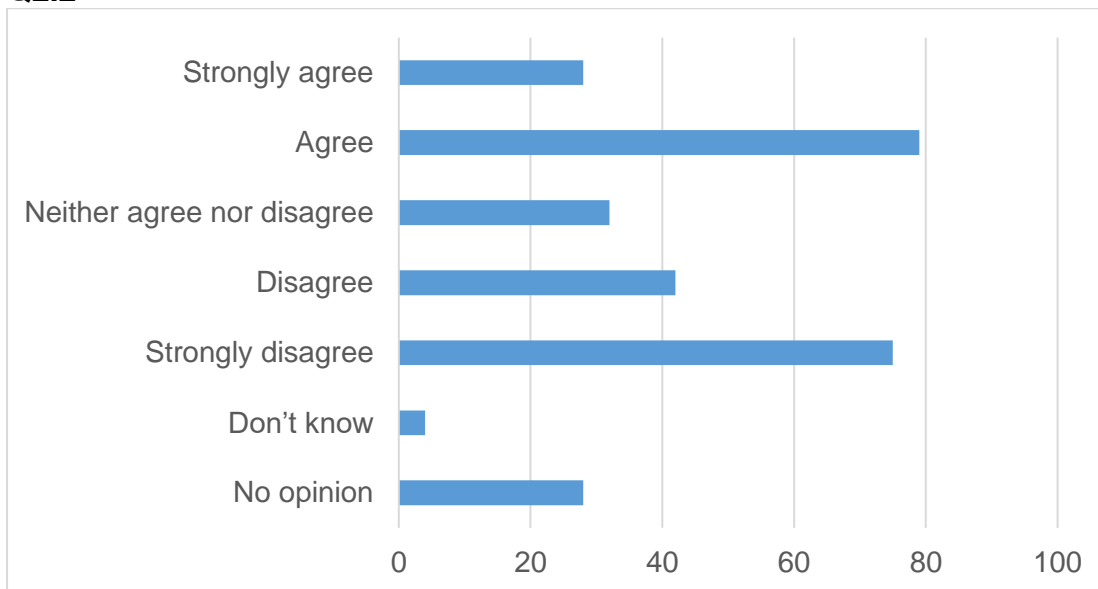
4.2.2 Charts Q2.1 and Q2.2 show the number and extent to which respondents agree or disagree with questions 2.1 and 2.2 respectively. The associated tables show the exact number and percentage of respondents expressing a view.

**Q2.1**



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion	Total
Number	25	83	47	33	57	7	36	288
Percentage	9	29	16	11	20	2	13	100

**Q2.2**



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion	Total
Number	28	79	32	42	75	4	28	288
Percentage	10	27	11	15	26	1	10	100

## Question 2 - Main Themes

4.2.3 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment for both questions 2.1 and 2.2.

Theme	Code	Count
Wind/solar developments	Damage to the countryside/ecological impacts e.g. danger to wildlife/environmental damage/should not be an 'acceptance of change' to landscape	59
Local democracy/decision making	Plans oppose local decision making/want local consultation and decision making/ability to object to new wind developments/to object on grounds of impact to landscape	54
Wind/solar developments	Reduce size, number or area of wind/solar development	52
Transportation	Improve road network/rural transport infrastructure/M4 congestion should be a priority/transport links to urban centres including active travel/e-bikes	38
Plans lack detail	General (non-specific)/doesn't supply enough evidence/needs to be more action orientated/measurable/less idealistic/lacks ambition	35
Rural areas	Not enough detail or emphasis given to rural communities in plans/agricultural industry/how will rural communities be supported for growth/too much emphasis on urban areas	29
Housing	Improve local infrastructure/employment/local amenities before housebuilding	27
Rural areas	Rural areas/Welsh landscape should be protected e.g. from industrialisation/urbanisation	25
Economy/tourism	Plans will result in negative impacts to the economy or tourism industry	23
Housing	Concern there isn't enough brownfield sites to fill demand	19
Housing	Needs to be greater rural development/should not be so much restriction on building on greenfield sites/the greenbelt/blanket restrictions for a 20 year period/PPW allows for considering greenfield development	18
Regions	Disagree with the regional split/too much focus on the South East	15
Housing	Need more affordable housing	14
General support	Agree with Welsh Government priorities/think that reducing carbon emissions is important/should be a priority	13
Housing	Housing need should be decided locally/increase the role or funding of local authorities/town and community Councils/LDPs	12
General opposition	Disagree with proposals/don't think they are achievable	10
Wind/solar developments	Generally oppose wind/solar development/don't believe it is a solution	10
Housing	New housing should be developed on the basis of need/areas where there is most demand	10

<b>Public transportation</b>	Public should be encouraged to use green public transport/active travel/electric bikes/emphasise car-free development	<b>10</b>
<b>The three regions</b>	Disagree with the three region split/Alternatives suggestions on region split e.g. 4 regions, Mid and South West Wales as separate regions	<b>8</b>
<b>Energy transportation</b>	Concern about how to connect rural wind/solar farms to the national grid/infrastructure necessary to transport the energy	<b>8</b>
<b>Welsh communities</b>	Better support Welsh communities/Increase or improve development/job opportunities in rural areas e.g. where Welsh speakers live/the areas with most Welsh speakers don't get enough investment	<b>8</b>
<b>South East Wales region</b>	Too much emphasis on Cardiff	<b>7</b>
<b>Alternative energy provision</b>	Government should consider offshore wind farms or tidal power/biomass/nuclear power	<b>6</b>
<b>Housing</b>	Concern about house building on the greenbelt/damage to green areas	<b>6</b>
<b>Flooding</b>	NDF doesn't take flooding into account/hasn't thought about flooding in relation to urban and rural development/wind farm siting	<b>6</b>
<b>Other</b>	Attracting younger people to Wales is important/should be a priority/concerned about Wales' aging population	<b>6</b>
<b>Perceived error/ omission in the NDF</b>	AONBs/heritage sites missing from maps	<b>5</b>
<b>Joined up approach</b>	Regions/ SDPs should work together/take one another into account	<b>5</b>
<b>Welsh Language considerations</b>	New housing developments should have a requirement for new Welsh Medium schools	<b>5</b>
<b>Costs</b>	NDF doesn't outline the cost of its proposals e.g. cost of wind/solar developments	<b>5</b>
<b>Housing</b>	Consider compulsory purchase on empty homes/use existing housing stock/unused housing before building new housing	<b>4</b>
<b>Plans lack detail</b>	Plans need to provide more information/greater clarity about regional/national growth areas	<b>4</b>
<b>Other</b>	Plans need to mention Enterprise zones e.g. Anglesey/Snowdonia Enterprise Zones	<b>4</b>
<b>Low emission vehicles</b>	Need greater investment/faster development of charging points	<b>4</b>
<b>Housing</b>	NDF should support/consider building new settlements/has been identified by PPW	<b>4</b>
<b>Concerns about wind turbines</b>	Impact to health/wellbeing	<b>2</b>
<b>Plans lack detail</b>	Maps inadequate for decision making/need more detailed maps/need population map	<b>2</b>
<b>Mid and South West Wales region</b>	Disagree with grouping of rural mid-Wales and Swansea/rural mid-Wales communities should be considered as a separate entity	<b>2</b>
<b>Consultation</b>	Supporting document contains inconsistencies between Welsh and English	<b>2</b>

<b>Consultation</b>	Want changes/clarification with NDF wording/definitions	<b>2</b>
<b>Wind/solar developments</b>	Generally agree with wind/solar development/believe it is the best solution	<b>1</b>
<b>Mobile action zones</b>	Agree there is a need for better mobile phone coverage/Have experienced poor coverage	<b>1</b>
<i>Other (unspecified)</i>		<b>71</b>

## Question 2 – Commentary

4.2.4 The following section is a more detailed commentary on concerns expressed by respondents. It also includes selected quotes from respondents, presented in italic, reinforcing those views. It covers both questions 2.1 and 2.2.

When asked about the spatial strategy and key principles for development in urban and rural areas, the most frequent concerns raised in Q1 were repeated here. Respondents were most commonly concerned with damage to the countryside, ecological impacts (e.g. danger to wildlife) and environmental damage. This was seen as being a result of wind, and to a much lesser extent solar, developments. Others stated that there should not be an 'acceptance of change' to landscape.

*Built up areas need more electricity and so should generate their own rather than just lay waste to the countryside for the needs of the built-up areas. Sorry but Wales hasn't been ruined yet and nor should it be, I will stand up and fight for the conservation of upland and rural wales for the future generations of Wales and the tourists who come to Wales to enjoy its natural setting*

Many reiterated their concerns about local democracy, or indicated a preference for local decision making when it came to new wind developments and also more generally.

*Using the NDF to push these developments through also creates a democratic deficit by over-riding consultation levers and established local development policies.*

Again referring to the proposed area for wind and solar developments, a similar proportion wanted to reduce the size, number or area of wind/solar developments, both in general and with specific reference to the proposed priority area.

*Rural areas Policy 4 I don't agree with the quantity of land shaded in for the RE proposals (Solar or wind). This needs to be reduced substantially.*

Responses to this question contained specific suggestions about transportation, such as about rural transport infrastructure and transport links to urban centres, such as active travel/e-bikes.

*However, it is a concern that active travel for improving walking and cycling applies only to town centre areas. It should also cover villages so that local people can cycle or walk to urban areas for employment, shopping, leisure and health activities to reduce car pollution. However, cycle lanes need to be considered by the side of the road where the road is wide enough to accommodate it without danger to cyclists from passing lorries.*

*The idea is that all new public service facilities of a significant scale should be located in town and city centres. It would be helpful to include stronger reference to place-*

*making and designing in community health and well-being, so that places are supportive of community health and health and well-being.*

*Consideration needs to be given to how to mitigate the potential disadvantages of this approach, including the issue of access to services for people that won't live in or near to town or city centres. If there is a time lag with the development of sustainable transport infrastructure then people in many parts of Gwent could be left behind and without access to services needed to support their well-being.*

*I am pleased to see a commitment to supporting rural communities but would like to see the development of a transport infrastructure which truly addresses communal rural transport links e.g. community electric buses, increased rail links and an extension of schemes such as Dial-a-ride but with sustainable hybrid transport utilising electric recharging points. [...] Means of public transport should be built into all new developments - adequate room for buses, use of electric buses, railways where appropriate - there are quite a lot of disused railways that could supply new developments.*

Comments on transportation also contained support for encouraging the use of green public transport or felt that wording around sustainable travel should be strengthened to support car-free development.

Others discussed how road networks needed improving both generally and with specific references to congestion on the M4.

*The NDF is proposing economic growth whilst remaining completely silent on the M4 which carries the majority of its freight and workforce*

*The current situation involves the M4 in South East Wales that is a major national issue. The level of congestion is increasing month by month in terms of queue length and amount of time each day there is significant congestion. This is essentially the only route connecting England to the whole of the southern half of Wales (Newport through to west Wales). Unless imminent measures are brought forward to address this issue the Welsh economy will suffer. The draft NDF fails to mention it let alone set out how the draft NDF outcomes would be achieved with this major issue.*

Some suggested that the plans lack detail. These comments were either general (i.e. not specific to any particular policy), or mentioned specific parts of policies 2 or 4, suggesting that the NDF doesn't supply enough evidence to support those policies, or needs to be more action orientated or with measurable outcomes.

*We question if it is forward looking enough and if it provides the solutions needed at this level for the next 20 years? For example, the NDF recognises connectivity issues (road and rail) in Wales but does not suggest any specific proposals for improvements. For a 20-year plan, the NDF should be more ambitious.*

*Policy 2: Too vague and not enough detail.*

*We largely agree with the proposals but question whether these aims are achievable. There is no substance to these nice words detailing how NDF hope to achieve this objective. The omission of a strategic plan for developing transport or health infrastructure or the Further / Higher Education sector to best serve all the communities of Wales.*

*Policy 4 'Supporting Rural Communities' falls short in providing any information on Welsh Government's objective to support and diversify rural areas. The policy is greatly dependent on lower tier plans but without providing any details on how to address the future of challenges in rural areas. This is very disappointing for Denbighshire because the local authority is largely rural in nature. What role will traditionally small market towns play in the development of Wales? Is Welsh Government committed to support these areas at the same level as the identified growth areas?*

*The draft NDF is described as a 'spatial plan' but it is only currently spatial for some topics, such as growth areas, onshore wind and solar, district heat networks. Yet other potentially spatial policies (e.g. Mobile Action Zones, biodiversity enhancement, national forests etc.) appear to be set aside for a later date, stating the Welsh Government "will identify" areas/sites. This inconsistency is carried throughout the document and comes across as a lack of detail and assessment on many of the topics, with the others such as wind and solar being incredibly detailed.*

*RTPI Cymru supports greater detail in the final NDF or supporting Annexes and would encourage a spatially specific approach backed up by evidence throughout the NDF - where possible as that detailed for renewable energy generation.*

Among these responses were comments seeking clarification on specific definitions within the NDF, such as how town or city centres are defined or what would constitute exceptional circumstances to developing elsewhere.

*Part of the issue with this policy is lack of clarity in terms of what is meant by town and city centres? Is it the retail boundary drawn around retail cores? This needs to be clarified.*

*In planning terms, town/city centres usually have tightly defined boundaries within LDPs and relate to the 'retail core' area. If the NDF definition assumes a wider boundary to 'town/city centres' then this should be explained within it. By way of illustration, the Council is currently working with joint venture with Welsh Government, to dispose of land at the Innovation Quarter in Barry Waterfront for a college campus. This site is not within the 'town centre' but is within easy walking distance of homes, rail and bus services, leisure uses, offices, shops and other services which make the site extremely sustainable. The policy should be clearer that sites like this will also be appropriate for these types of public service facilities.*

*The document could usefully seek to explain what "exceptional circumstances" could comprise? i.e. where there are areas of identified need/ defined shortages in terms of access to services*

Others pointed out that the NDF's traffic light system for wind development was confusing, inappropriate or gave 'wrong signals', or needed to be included on maps for clarity.

- *It is highly unlikely that developers would be searching in National Parks or AONBs.*
- *Amber provides an incorrect and confusing signal.*
- *Defining green areas is unlikely to be appropriate at this level.*



*The maps need to be presented in terms of red/amber/green for each technology – it will also be necessary to indicate areas where there is no potential due to lack of resource.*

*It is our view that the traffic light approach is misleading, fails to provide a clear position on where development will come forward and should be removed from the NDF in favour of criteria based policies.*

Comments about policy 4 lacking specific detail often accompanied remarks about a lack of detail regarding rural areas, including that there is not enough detail or emphasis given to rural communities or how those communities will be supported for growth or that greater emphasis has been laid upon urban growth. Additional concerns about rural areas tended to focus on the industrialisation of the landscape, including concerns about high density development.

*The Rural Area policy is very vague and contradicts the Urban Policy - If funding is concentrated in Urban Areas how can we persuade young people to remain in the Countryside where funding is less (no jobs, poor infrastructure, limited housing)*

*There is a marked emphasis and detail on the Urban with 3 policies as opposed to the one policy for the Rural areas. Although there are references and aspirations for the Rural it would appear that there is an over reliance on local LPDs and SPDs to fill in this gaping void and no overall National Way Forward for Rural areas*

*I would love to see any aspects of your rural policies that saw Mid Wales as an area to be cherished and celebrated, rather than a place to exploit or ignore. I know our local elected representatives go to Cardiff-well, because they have to. That is where the Assembly building is. But I never seem to hear of visits here (other than when campaigning) I challenge Ministers and Portfolio Holders to come with open minds and see what a wonderful place it is, to travel around our beautiful scenery and actually look positively at it as a place to visit and stay, rather than a featureless void between Snowdonia and the valleys*

*Higher density creates tensions with providing adequate space for Green Infrastructure including gardens, parks, open spaces and street trees. There would be a conflict in practice that means infilling gardens or not providing the necessary scale of green areas within a development. For example, in 2013, in Wales, just 1% of all urban tree cover (a principal component of urban green infrastructure) was found in areas of high-density housing, often being those areas experiencing the highest levels of deprivation. Private residential gardens make up 35% of Wales' urban areas, providing 20% of all our towns' tree canopy, being 29% of all urban trees. (Figures from NRW's urban tree canopy cover assessment, p64). Their report showed that 159 of Wales' 220 towns lost canopy cover between 2006 and 2013, including 7000 large trees and 20 hectares of urban woodland. Policy measures that actively reverse such trends are needed if we are to use Green Infrastructure effectively to mitigate climate change effects in urban areas.*

Comments about housing most commonly focused on making infrastructure, employment or amenity improvements before starting new housing developments.

*You talk of 'town centres first'. in rural towns everything gets taken away from banks, libraries, transport, recycling stations. If '...they are integral to the health and*

*livelihood of our nation', then I think they should be supported much more. not many jobs prospects and even if say a housing scheme was planned and executed, the building jobs do not go to local builders, plumbers, carpenters etc but are contracted to bigger companies out of the area!*

*Where people live is market driven effected by a number of issues the most influential of which is employment, this needs to be resolved first, development alone will not solve this problem.*

*[T]here is a need to develop smaller market town / sub-regional towns, which have historically served rural areas. WG need to sustain good public transport services and a range of economic activities irrespective of the critical mass of people otherwise there will be inequalities in opportunities in rural areas, migration of young people and a loss of cultural, social and economic opportunities in the rural areas (including diminishing use of the welsh language).*

Other housing related concerns included views that there are currently insufficient brownfield sites to fill demand for affordable housing (and housing more generally) and related comments which suggested there should be greater rural development or fewer restrictions on building on greenfield sites. Some of these comments revealed worries that placing restrictions now on greenfield development for the next 20 years could cause problems in the future if such development becomes a necessary consideration. Other comments pointed out that Planning Policy Wales has more relaxed guidance on greenfield development.

*We need more development in rural areas which are suffering from a withdrawal of services and facilities. We need more housing in these areas, which will make these areas more viable and will allow the younger generations to remain in these areas.*

*Currently, national policy allows consideration of suitable and sustainable greenfield sites within or on the edge of settlements, alongside new settlements in the open countryside in exceptional circumstances (PPW Edition 10 Para 3.40 refers). This recognises that there is a need to provide a range and choice of sites to ensure that there is a deliverable supply of housing to satisfy each Council's housing requirement. By way of example, Cardiff's 2010 Local Development Plan (LDP) was initially withdrawn as a result of concerns raised by the Inspector due to its overreliance on brownfield land – which is a finite resource in terms of availability.*

As well as insufficient brownfield sites generally, some warned that there was limited public land for delivering either mixed use or affordable housing, particularly as local authorities already use capital receipts from land disposal to deliver other objectives.

*Given that bringing a site forward for development is a significant challenge in its own right, limiting sites to urban areas and publically owned land makes this challenge even harder.*

*We are also not convinced that such a policy on its own will change the mindset of the public owners who will still be looking to maximise the capital receipt from the land. If they are not allowed to do this then they may not bring the land forward resulting in fewer new homes being delivered.*

*The principle of giving positive consideration to the future use of publicly owned land is generally supported. However, the Council currently uses capital receipts from land*

*disposal to deliver other strategic objectives such as 21st Century schools programme and regeneration initiatives. Welsh Government either needs to support Council's financially to deliver these agendas or leave it to Councils to determine how they proceed with individual sites. Otherwise it will inhibit Local Authorities whose priorities differ from those identified by Welsh Government.*

*To deliver the intentions of Policy 3, a culture change will need to be achieved within Public Bodies where all departments are in a position to work towards the longer term wider well-being goals, rather than be under pressure to maximise the capital receipt for plots of land*

Smaller proportions of responses said that generally there needs to be more affordable housing available, suggested housing need should be determined locally, or by Local Authorities, LDPs or other local community bodies, or developed according to levels of need.

### Easy-read Questions 1 and 3

We have 10 aims in the NDF.

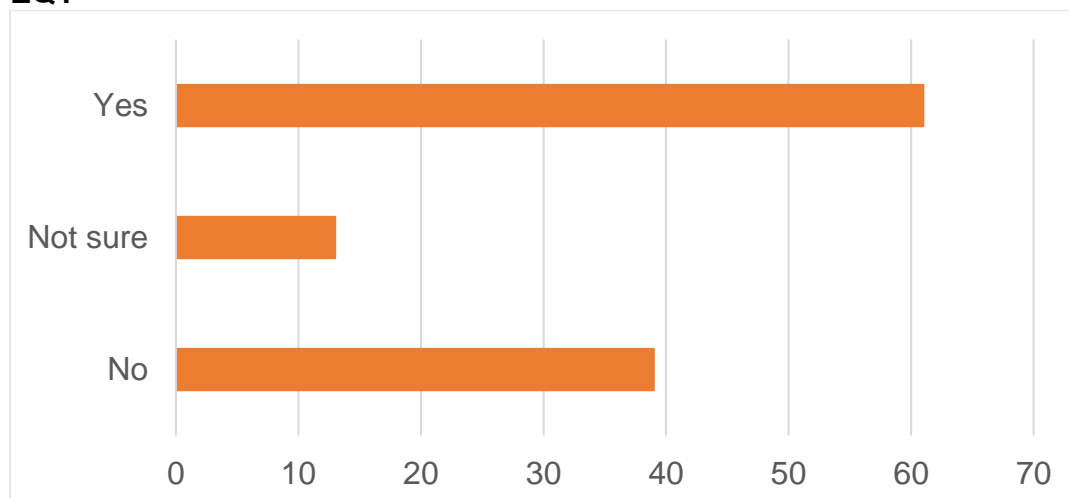
Q.1 Should we think about anything else?

Q.3 Do you think the Plan will help achieve healthy and well-planned places?

### Easy-read - Statistics

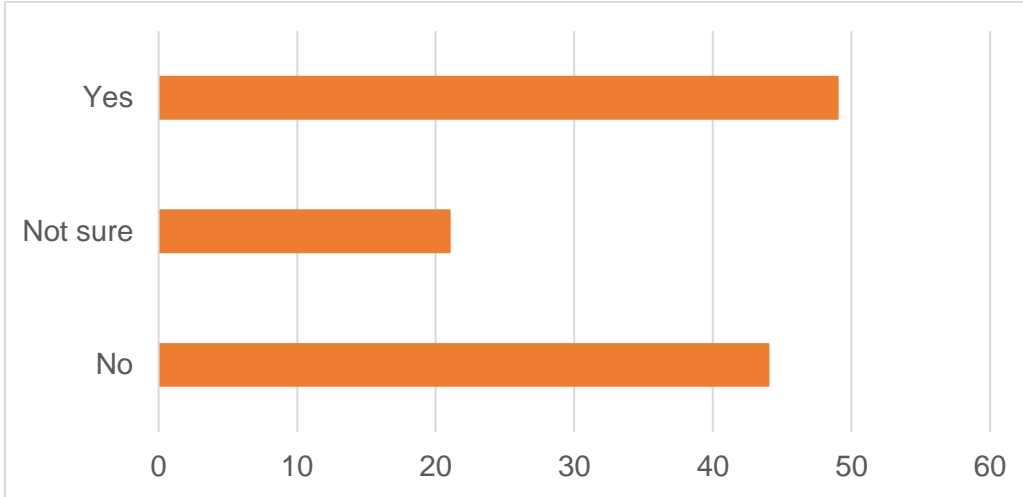
4.2.5 Charts EQ.1 and EQ.3 show the numbers and extent to which respondents agree or disagree with questions 1 and 3 respectively. The associated tables shows the exact number and percentage of respondents expressing a view.

#### EQ1



	Yes	Not Sure	No	Total
Number	61	13	39	113
Percentage	54	12	35	100

### EQ3



	Yes	Not Sure	No	Total
Number	49	21	44	114
Percentage	43	18	39	100

### Easy-Read Question 1 - Main Themes

4.2.6 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment. It covers easy-read question 1.

Theme	Code	Count
Wind/solar developments	Damage to the countryside/Ecological impacts e.g. danger to wildlife/environmental damage/should not be an 'acceptance of change' to landscape	14
Viability	Unsure if the plans are feasible/won't happen in reality	9
Economy/tourism	Plans will result in negative impacts to the economy or tourism industry	8
Wind/solar developments	Otherwise against the construction of onshore wind turbines	7
General support	Generally agree with principles/aims/outcomes of the NDF	7
Viability	Requires joined up working e.g. between Welsh government and LAs	5
Wind/solar developments	Impact to health/wellbeing	4
Energy transportation	Concern about how to connect rural wind/solar farms to the national grid/infrastructure necessary to transport the energy)	4
Transportation	Improve road network/transport links to urban centres	4

<b>Housing</b>	Local amenities need to be considered/improve local infrastructure when house building	<b>3</b>
<b>Viability</b>	Requires funding commitment/fair funding to be successful	<b>3</b>
<b>Local democracy/ decision making</b>	Plans oppose local decision making/want local consultation and decision making/ability to object to new wind developments/to object on grounds of impact to landscape	<b>3</b>
<b>Housing</b>	Consider compulsory purchase on empty homes/use existing housing stock/unused housing before building new housing	<b>2</b>
<b>Housing</b>	Generally against house building	<b>1</b>
<b>Housing</b>	Concern about house building on the greenbelt/damage to green areas	<b>1</b>
<b>Welsh Language</b>	Disagree with proposals for the Welsh language/Welsh language not a priority/Welsh speaking targets are unrealistic	<b>1</b>
<b>Other (unspecified)</b>		<b>13</b>

### Easy-Read Question 1 – Commentary

4.2.7 The following section provides an easy-read commentary on concerns expressed by respondents. It also includes selected quotes, presented in *italic*, reinforcing those views.

When asked whether Welsh Government are aiming to do the right things with their plan, 52 respondents from the easy read consultation gave comments. Responses tended to centre around the proposals for wind and solar developments as well as housing and to a lesser extent transportation.

Most commonly, respondents were concerned about the impact of wind turbines to the landscape, environment or wildlife of rural Wales, but others gave comments otherwise indicating that they were against the construction of onshore wind turbines, or objected on the grounds of health and wellbeing.

*I strongly believe wind farms should be offshore, I strongly feel that the beauty, wildlife, tourism will be damaged by wind farms*

*Mid wales landscape should be protected so I believe that the landscape changes set out in the proposal are wrong.*

Others gave comments otherwise indicating that they were against the construction of onshore wind turbines or objected on the grounds of health and wellbeing. The health and wellbeing concerns centred around noise created by turbines, or their visual impact to local residents.

*Generally "Yes" with the exception of the approach to onshore wind farm development*

*It is an ill thought out plan with no concern for the human body and the fact that subsonic noise could have negative effects on the human body, such as disturbed sensory perception or circulatory problems does not seem to have figured, or considered important enough, in your plans*

*it's about time you thought about the residents of this area, what is it going to do to them, the noise from the turbines, the ugly scar on the landscape and the effect it will have on property in the area*

Transport concerns were again linked to the connectivity of rural communities, particularly in mid Wales, with urban areas and a lack of existing public transport infrastructure in these areas.

*Disadvantages the many rural communities in Wales. Where I live in mid Wales no good roads to get to these cities nor good public transport.*

*I'm concerned about Mid Wales, according to the plan, a place with no connectivity to North or South Wales. [...] Montgomeryshire has no connectivity in any way with the Swansea region. I'd guess that 90% of residents had never been to the Swansea region, there's not even a direct road network linking communities. I note that improved links are to be encouraged between N Wales and Liverpool, Chester and Manchester. However, there is no mention of improved links between Mid Wales and Liverpool, Chester, Birmingham, Hereford etc. Has nobody noticed the congestion on the A5 between Oswestry and Chester, or even looked at the impact that has on A483, the artery to Mid Wales?*

### Easy-Read Question 3 - Main Themes

4.2.8 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment. It covers easy-read question 3.

Theme	Code	Count
General	Agree with Welsh Government priorities /think that reducing carbon emissions is important/should be a priority	6
Wind/solar developments	Damage to the countryside/Ecological impacts e.g. danger to wildlife/environmental damage/should not be an 'acceptance of change' to landscape	6
Economy/tourism	Plans will result in negative impacts to the economy or tourism industry	6
Rural areas	Not enough detail or emphasis given to rural communities in plans/how will rural communities be supported for growth/too much emphasis on urban areas	6
Wind/solar developments	Impact to health/wellbeing	5
General	Disagree with proposals/don't think they are achievable	4
Plans lack detail	General (non-specific)/needs to be more action orientated	4
Transportation	Improve road network/transport links to urban centres	3
Mid and West Wales region	Plans disproportionately impact mid Wales/mid Wales not being listened to	3
Regions	Alternatives suggestions on region split	1
Wind/solar developments	Learn from TAN8/TAN8 was a failure/plans too similar to TAN8	1

<b>Housing</b>	Concerned about the environmental damage of housebuilding/new houses should be eco-friendly/carbon neutral/energy efficient	<b>1</b>
<b>Local democracy/ decision making</b>	Plans oppose local decision making/want local consultation and decision making/ability to object to new wind developments/to object on grounds of impact to landscape	<b>1</b>
<b>Energy transportation</b>	Concern about how to connect rural wind/solar farms to the national grid/infrastructure necessary to transport the energy	<b>1</b>
<b>Greenbelt</b>	Support areas designated as greenbelt land	<b>1</b>
<b>Wind/solar developments</b>	Reduce size, number or area of wind/solar development	<b>1</b>
<b>Housing</b>	Concerned about the environmental damage of housebuilding/new houses should be eco-friendly/carbon neutral/energy efficient	<b>1</b>
<b>Mobile Action Zones</b>	Concerned about health impacts of 5G	<b>1</b>
<b>Other (unspecified)</b>		<b>4</b>

### Easy Read Question 3 – Commentary

4.2.9 The following section is a more detailed commentary on concerns expressed by respondents. It also includes selected quotes from respondents, presented in italic, reinforcing those views. It covers easy-read question 3.

When it came to considering whether the plan will help achieve healthy and well-planned places, respondents most commonly lent support to the principle or prioritisation of reducing carbon emissions.

*Nice to see commitment to allowing more areas for renewable energy. this is a must if we are to achieve carbon reduction targets.*

*We need a radical change in our lifestyles, we are ready to change.*

Nevertheless, respondents still reiterated their concerns about the impact of wind turbines on the environment and tourism to a similar extent, as well as feeling that rural areas had too little support or emphasis in the plans when compared to urban areas.

*Young people need a reason to stay living in the countryside, there for encourage small industry to move to the small towns and not to the big conurbations which seem to create more ill feelings towards your neighbour. If the countryside is spoiled there is no valid reason for young people to stay. A Wales where people can live happily in the countryside must be a goal worth aiming for.*

Relatedly, some suggested mid Wales was not being listened to, or received fewer benefits and more negative impacts under the proposals.

*With the amount of on shore wind farms proposed for Mid Wales, the noise pollution will drive everybody out.*

*Powys has closer links and connectivity to England, and that should be developed to fulfil the aims. There are already too many cases of Mid Wales residents having to go*

*to Cardiff for health care, away from family and friends instead of being treated close to home over the border.*

## **Written Submissions**

4.2.10 The following consultation responses were provided as a written submission and did not use either a full or easy-read questionnaire.

### **Agreement with the principles**

Many submissions prefaced the response with a statement that they generally supported the principles, outcomes or ambitions of the NDF at an overall level, before typically going on to make specific suggestions for improvement or greater detail or expressed concerns with the approach. The principles of the NDF were described as “*difficult to disagree with*”

*We are very supportive of the draft NDF and its aims and objectives in replacing the Wales Spatial Plan, by providing a distinct vision for the country and its future for the next 20 years. In addition, we welcome and endorse the comments from the First Minister in seeing the NDF as a building block in making Wales a fair, green and prosperous place. Also, we are encouraged and agree with the comments of the Minister for Housing & Local Government who wants to ensure everyone has access to a good home and importantly that we all want a planning system that consistently delivers the homes that meet our needs.*

*The Cabinet welcomes a strategic approach to development in Wales and recognises the opportunities for using the planning system to address national and regional priorities. Clearly, a strategic approach can play an important role in informing the infrastructure investment and developments needed to deliver in areas relating to economic growth, decarbonisation, resilient ecosystems, and health and community well-being. As a major urban area, Cardiff particularly welcomes Policy 1, which explicitly supports sustainable urban growth given it is uniquely positioned to deliver on this.*

### **Rural communities and landscapes**

One of the points relating to rural communities was the potential impact of multiple outcomes on the agricultural industry. One respondent highlighted the need among farmers to diversify their income streams, suggesting that few farmers would benefit from wind turbine developments and that they would restrict many farmers’ abilities to generate income from tourism and eco-tourism. This respondent suggested there had been an increase in planning applications for large scale or industrial farming, which could be environmentally damaging.

Pentyrch Community Council also gave caution about large scale factory farming, and suggested the NDF needed to extend the greenbelt proposal in the South East region to include the Special Landscape Area comprising Garth Hill and Ridges and prevent Cardiff from extending into agricultural land as well as afford greater protections for family owned and tenanted farmers. While Pentyrch Community Council was concerned about urban sprawl impacting on agricultural land, a local councillor in Powys was also concerned about the



proposed increase in woodland coverage impacting upon traditional livestock farm land and felt that farming unions should be directly consulted on this point.

*There is also a need to address the current trend for farm diversification that is based on high volume egg, chicken and cattle (including veal) production, as can be seen from the increasing number of planning applications for such, essentially industrial, proposals. The present trend for growing large crops of maize for fuel production is another matter with worrying impacts on the local environment. The ecological, environmental and infrastructure impacts of all such developments are considerable and often negative. Urgent action is needed to deal with the likely post-Brexit situations in which Welsh agriculture could, by a number of admissions, suffer greatly.*

**Private individual**

*We are concerned that the dNDF does not include protection of family owned and/or tenanted farms which are vital for food security, protection of language and cultural identity as well as a bastion against large scale factory farming*

**Pentyrch Community Council**

## **Other concerns**

Several organisations raised very specific considerations based on their areas of expertise which otherwise did not feature frequently or in detail elsewhere among the consultation responses. These included submissions by Dwr Cymru detailing the potential impact of new developments on Wastewater Treatment Works and suggesting the NDF takes into account their Drainage and Wastewater Management Plans (DWMPs) to help consider population change and the effect of this on the environment.

*It is useful to have this broad indication within the NDF of where strategic growth will be focussed and the approximate housing requirement that will need to be provided for, however we will need to await consultation on the SDPs for further information regarding the breakdown of growth between settlements to allow us to assess the potential impact of growth upon our infrastructure. For example, not every settlement is served by its own Wastewater Treatment Works (WwTW), the catchment area of some WwTW cover numerous settlements therefore the impact on our assets will be dependent upon the amount of growth proposed within individual catchment areas.*

**Dwr Cymru Welsh Water**

Finally, across all responses, there is a deep cynicism of both the NDF and the consultation process. In this group, two people expressed these views. One of these said that the NDF:

*...could have been written a decade ago except for the additional major issues of climate change and energy which should be held up as the most important current considerations. It does not suggest a complete understanding of the situation we are in today and this is reflected in the lack of the human/people focus in key spheres of the sustainable model.*

While another expressed their scepticism that the consultation will ever lead to action:

*... we have never put in place credible plans for our future and the future of our immediate descendants let alone the planet. It is therefore given past examples of failure to be transparent or to get it "right first time" or provide "best value",*

*questionable as to what is the plan for all the ideas that come forward this time. Numerous past consultations have come and gone without any real results or measurable changes being made clear and transparent, or that progress has been made...*

## **Welsh Government Response - Spatial Strategy**

- 4.2.11 The Welsh Government's reply in this section covers both the Question 2 of the full questionnaire and Question 1 of the easy-read questionnaire.
- 4.2.12 Relatively few comments were received in relation to the overall spatial strategy proposed in the draft NDF. The comments received tended to be detailed and related to concerns with specific policies rather than the broad spatial approach. The small number of comments made in relation to the strategy have led to important proposed changes.
- 4.2.13 A new policy – 'Where Wales will grow' – is proposed as the first policy of the NDF. The policy will set out the principles of the spatial strategy, and is equivalent to a settlement hierarchy policy commonly found in Local Development Plans. The policy is largely comprised of text from page 24 of the draft NDF, but with the added weight of being expressed as a policy.
- 4.2.14 The proposed policy sets out the three National Growth Areas and the characteristics that development and investment in these areas should seek to maintain and enhance. The three areas are unchanged in the spatial extent from the draft NDF. The policy identifies Regional Growth Areas in three of the regions and broadly describes where they are. Detailed descriptions and policies for all National and Regional Growth Areas are laid out in Chapter 5 on the Regions. The explanatory papers on the spatial strategy and the regions provide more detail on the factors that determined the spatial strategy.
- 4.2.15 The consultation highlighted concerns among many respondents about the vision for rural areas, with the perception that the draft NDF gave too much emphasis to urban areas. The rationale for the draft NDF's approach to rural communities is set out in the rural areas explanatory paper. We maintain that Strategic and Local Development Plans are the appropriate tier of the planning system for making detailed proposals for rural areas, given the variations in the characteristics of different rural places. We also agree that it is important the NDF provides clear and positive vision for sustainable development in rural areas. The creation of a fourth region, achieved by splitting Mid Wales and the South West, is a sign of this recognition, as is the proposal to include an additional national policy on rural issues. Details of the new region are set out under question 11 (section 4.7), and the new policy is introduced later in this section.
- 4.2.16 There were common issues raised in respect of the spatial strategy, affordable housing policy and regional policies including the deliverability of

the draft NDF's ambitions, concerns that the NDF focused too heavily on brownfield development and a perception the NDF contradicts Planning Policy Wales by not advocating any new towns. Weaknesses in public transport provision and areas within the growth areas being at risk of flooding were also identified as potential constraints to sustainable growth in the growth areas.

4.2.17 We acknowledge the absence of a flood risk policy in the draft NDF, and the implication this had on providing certainty about the deliverability of the spatial strategy. Details of the proposed new policy on flood risk management are set out under question 15 (section 4.8).

4.2.18 More broadly we believe the range of NDF policies, in combination with each other, provide a framework for delivering sustainable growth in urban parts of the identified growth areas. No new towns are identified by the NDF because we believe housing need and demand is best addressed by development in existing centres. This position is not a contradiction with Planning Policy Wales, which enables but does not require development plans to identify new towns.

The proposed changes address Conclusion 1 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.

### **Welsh Government Response – draft Policy 1: Sustainable Urban Growth; draft Policy 2: Supporting Urban Centres**

4.2.19 Draft Policies 1 and 2 have been updated and are proposed to become Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking in response to the consultation. There was some criticism that the draft NDF lacked a vision for the future, was too business as usual and didn't reflect the importance of placemaking to the planning system in Wales. In response to this, the updated policy sets a clear aspiration for the growth and regeneration of towns and cities to positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed use centres and public transport, and integrated with green infrastructure. A set of strategic placemaking principles has been introduced to support urban growth and regeneration achieve this aspiration.

4.2.20 There were some concerns that the policy in the draft NDF was only promoting high density development and would result in high rise developments that were poorly designed and wouldn't provide the type of housing people want to live in. This is not the intention of the policy, which is instead seeking to promote higher (not high) density development than is currently being built.

4.2.21 The reason the policy promotes an increase in population density is that the building of lower density development is creating car-dependent housing

estates and retail/business parks, which make it hard for people to get around on foot and by bike, and make public transport services uneconomic. This has major health and well-being implications, contributing to obesity, loneliness and isolation. It exacerbates health disadvantages for certain groups, such as the elderly, those caring for young children, children themselves, those with disabilities and those in poverty. It also draws activity away from town centres and results in areas that lack a sense of place and community. It can also result in the loss of green space and countryside, undermines efforts to tackle climate change, and exacerbates noise and air quality pollution problems.

4.2.22 We recognise the importance of catering for varied lifestyles and it is not the intention for all new development to be high density or for all housing to be flats. The updated policy is clear that new developments should respond to the local context. The density and nature of development should vary to reflect the proximity to a town centre, the public transport accessibility and the nature of the street. The policy is clear that the densities we are promoting do not require high rise development and that the aim is to promote more urban forms of development, such as terraced streets and perimeter blocks. These can provide a range of housing types, including good sized family homes, with terraced houses, town houses, mews houses and small blocks of flats.

4.2.23 We recognise that the placemaking principles, whilst generally well recognised, can be challenging to implement in practice. However, a business as usual approach won't create the successful and sustainable places we want. To address this, along with concerns that the NDF lacks clarity about how lower tier plans should respond, the updated policy recommends local planning authorities establish a spatial framework for each town and city. The intention is to establish a proactive, integrated and place-based approach to spatial planning to guide growth and regeneration. As well as identifying the best way in which towns and cities can expand, the intention is to encourage a greater focus on planning for existing neighbourhoods, particularly those in need of regeneration, and to establish a framework that provides greater certainty and enables places to evolve over time.

4.2.24 We will be undertaking further work to support local planning authorities with the implementation of this policy.

The proposed changes address Conclusion 49 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.

#### **\* Proposed New Policy 6 - Town Centre First**

4.2.25 Draft NDF Policy 2 has been significantly updated and developed in response to the consultation. As a result of these amendments, we have developed proposed Policy 6: Town Centre First. The consultation responses queried why draft Policy 2 only applied to public sector developments and why it didn't also include private sector developments. Whilst the intention was for the public sector to show leadership in adopting a Town Centre First approach, it is agreed that these principles should also apply to the private sector. The

policy has been updated to apply to new commercial, retail, education, health, leisure and public service facilities.

- 4.2.26 Some respondents raised concern that locating public services in town centres can be challenging in practice. It is acknowledged that this may be the case, but there are major health, well-being and equality implications if developments are not accessible to all. We must appreciate that not everyone has access to a car, can drive or wants to drive. Car-dependent facilities, which need to be accessed by members of the public or employees, are therefore not appropriate or acceptable.
- 4.2.27 It is critical that developments are located in town centres, where their users can easily walk, cycle and/or use public transport to access them. This is a key aspect of placemaking and needs to be implemented if we are going to deliver on our objectives of creating sustainable places that improve people's health and well-being. Locating these facilities within town centres will also support shops, as well as other facilities, and reinforce their role as the focal point of places.
- 4.2.28 Some respondents raised concern that the policy required all new public services to be located within the boundary drawn around retail centres in Local Development Plans. This is not the intention and the policy has been amended to address this misconception and to allow for its sensible implementation. For example, it is recognised that some facilities, such as district hospitals, can require large areas of land and it is not expected that they should be located within the retail boundary of towns and cities centres. Rather, they should be located centrally within a town or city and where there is good access by public transport. It is also recognised that some smaller services, such as GP surgeries or primary schools, may be better located in accessible locations within neighbourhoods, particularly local centres.
- 4.2.29 The policy is intended to promote creativity in the way that developments are provided and designed. If located centrally, and accessible by public transport, developments can be built at higher densities and don't need large areas of land for car parking. This can allow the same facilities to be built on a much smaller plot than would be needed for an out-of-town, car based development. It may also be better to re-purpose an existing building than to build a new one. Equally, it may be better to use a number of smaller buildings within a town, rather than building one large building.
- 4.2.30 Some respondents queried the applicability of using a sequential test for non-retail developments, such as with health services. The policy retains the use of a sequential approach, as this is intended as a positive tool to help identify in Strategic and Local Development Plans the best location for development. Where a proposal is not allocated in a development plan, the sequential test is there to assess whether a thorough assessment of different options has been undertaken.

## Welsh Government Response – draft Policy 3: Public Investment, Public Buildings and Publicly Owned Land

- 4.2.31 Draft Policy 3 has been updated, becoming proposed Policy 3: Supporting Urban Growth and Regeneration – Public Sector Leadership. In response to criticism that the NDF needs to be more visionary, less business as usual and stronger on placemaking, the updated policy is clearer on the importance of a strengthened public sector role in enabling urban growth and regeneration. It more explicitly supports placemaking and the objective of improving the health and well-being of current and future generations. It also provides a clear statement that the Welsh Government will assemble land, invest in infrastructure and prepare sites for development, as well as support local authorities unlock the potential of their land. The policy has also been more closely aligned to supporting the Shaping Urban Growth and Regeneration – Strategic Placemaking policy (proposed Policy 2).
- 4.2.32 The quality of development being built is not meeting our placemaking expectations. Recent research found that the design of new housing environments was ‘mediocre’ or ‘poor’<sup>2</sup>. This audit was of developments in England, but the results reflect our concerns about the design quality of developments in Wales. The updated policy highlights that the development industry in Wales needs diversifying and a greater public sector role is needed. Evidence shows that when the public sector takes a more active and enabling role, combined with an integrated approach to spatial planning, better places can be created. This can result in developments that are better designed, are more environmentally sustainable, are served by high quality infrastructure and create places that provide a much better quality of life.
- 4.2.33 Some of the consultation responses raised concern that too much emphasis was being placed on publicly owned land meeting Wales’ housing and growth needs, and that the public sector no longer has much land suitable for development. It is recognised that publicly owned land cannot provide all the land needed to meet our growth and regeneration needs and aspirations. Equally, land ownership should not dictate where development is located and instead the sites most suitable for development and regeneration should be identified through a plan-led approach, as promoted in the Shaping Urban Growth and Regeneration – Strategic Placemaking policy. The updated policy promotes a more active role for the public sector, including the assembly of land and enabling of development, and planning authorities are encouraged to work proactively and collaboratively to support this.
- 4.2.34 Some local authority responses highlighted that they rely on the capital receipts from land disposal. There were also responses highlighting that a culture change will be needed before all the public sector is working towards longer-term well-being benefits. It is acknowledged that, after years of

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<sup>2</sup> Place Alliance (2019) [A Housing Design Audit for England](#)

austerity imposed by the UK Government, the public sector is in a tough financial position. However, the public sector also has an obligation to use its assets to deliver public good and, under the Well-being of Future Generations Act, to think about the long-term impacts of decisions and improve the well-being of current and future generations

4.2.35 The purpose of the policy is not to prevent the public sector from making a profit from the development of its land, but instead to ensure it is supporting growth and regeneration for the benefit of communities. This requires redefining how we think of value for money and, rather than just selling land to the highest bidder, considering how best the site can be developed. Selling land to large developers is also often not the best option and much better outcomes can be achieved if the public sector can retain ownership of sites. This gives greater control over the quality of development and the securing of wider well-being benefits. This can also provide the opportunity to take a plot-based approach to development and subdivide sites into small plots that can enable a wide range of smaller and local developers to become involved. There are examples of great places where the local authority has done this, giving a preference to individuals, cooperative, social housing providers and local builders when selling plots.

4.2.36 The policy has been updated to remove the element on new development being located in town centres, as this is now addressed in the Town Centre First policy (proposed Policy 6).

The proposed changes address Conclusion 16 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.

## Welsh Government Response – draft Policy 4 Supporting Rural Communities

4.2.37 Draft Policy 4: Supporting Rural Communities supports sustainable settlements and proportionate growth reflecting the scale and needs of the settlement. Unlike National Growth Areas, the policy identifies regional and local planning as the most appropriate level at which matters such as rural housing and employment provision or transport and other infrastructure provision should be considered.

4.2.38 Concerns were raised that Policy 4 is not sufficiently ambitious or proactive in supporting rural areas, does not provide enough detail, and is dependent on lower tier plans to implement. Also, that too much emphasis is focused on growth in larger urban areas to the detriment of growth opportunities in rural areas.

4.2.39 To help address these issues the draft NDF Policy 4 has been split in to two policies, a revised Policy 4 Supporting Rural Communities and proposed new Policy 5 Supporting the Rural Economy. Policy 4 covers general needs and

issues affecting rural settlements whilst Policy 5 concentrates specifically on the rural economy. The purpose of this is to improve focus, and add greater detail and clarification in the supporting text.

- 4.2.40 The revised Policy 4 has been simplified to reflect the separation of rural topics. Reference to “transport” are moved to the supporting text, whilst diversification and “appropriate and proportionate economic growth” is discussed in Policy 5. The supporting text of both policies has expanded significantly.
- 4.2.41 A large number comments on draft Policy 4 concerned wind and solar energy developments in rural areas. In particular their impact on rural tourism, the environment, landscape character and its “industrialisation”. The Welsh Government’s response to renewable energy in the countryside is addressed in the revised NDF renewable energy policies, as detailed in section 4.6
- 4.2.42 Comments were expressed that the NDF did not discuss the challenges facing rural areas sufficiently. The revised NDF explains Planning Authorities should recognise the different needs of rural areas, addressing these through Strategic and Local Development Plan policies. Policy 4 emphasises that rural areas must provide jobs and housing if they are to retain or attract people of working age and if services and facilities are to remain to strengthen the viability and sustainability of settlements. This in turn will help address rural depopulation, age imbalance, deprivation, inequality, social isolation, and Brexit consequences. Planning Authorities should consider the needs of all residents, including older people and people with disabilities and ensure that specialist housing provision is considered and planned for.
- 4.2.43 Concerns were raised that draft Policy 4 does not address rural transport and connectivity. The Policy’s supporting text now highlights the importance of investment in public transport, active travel and electric charging infrastructure, and how good placemaking can help reduce reliance on cars and contribute to health and wellbeing. It is accepted, however, that in remoter areas movement by car is still likely to be an essential mode of transport. The importance of effective movement across and between regions is also emphasised; Regional and Local authorities should work together to improve this. Policy 4 should be read in conjunction with transport and connectivity strategies set out in revised Policy 2 Shaping Urban Growth and Regeneration – Strategic Placemaking, proposed Policy 6 Town Centre First, proposed Policy 11 National Connectivity and proposed Policy 12 Regional Connectivity.
- 4.2.44 Some respondents considered that draft Policy 4 lacked ambition citing the term “appropriate and proportionate growth” of settlements as restrictive, leading to less rather than more sustainable communities. The term has been moved from the policy and is now in Policy 5. The term is not intended to be restrictive, growth is determined by the needs of the community and



surrounding area and by Planning Authorities' rural strategy identified through Strategic and Local Development Plans. Outside National Growth Areas, Regional Growth Areas (including in rural areas) will grow, develop and offer a variety of housing, economic and public and commercial services at regional scale. Development and growth in smaller towns and villages in rural areas where services, facilities, transport and other infrastructure, and the proximity of housing and employment, provide the most sustainable option should be proportionate and of appropriate scale, and support local aspirations and need.

4.2.45 Respondents considered the NDF did not emphasise enough the need for fast modern digital communications infrastructure in rural areas. The supporting text of Policy 4 has been expanded to address this, recognising the benefits this brings to the rural economy, communities, and individuals, and the role that Planning Authorities can play in helping facilitate its delivery. In addition, a new proposed policy, Policy 13 Supporting Digital Communications, has been added to the NDF to address the need for fast modern infrastructure across all parts of Wales.

#### **\* Proposed New Policy 5 - Supporting the Rural Economy**

4.2.46 Concerns were raised about the lack of economic ambition in rural areas with implications for growth potential. Proposed Policy 5 Supporting the Rural Economy and its supporting text recognises the need to tackle issues such as depopulation, Brexit, and lack of well-paid quality jobs, and to develop a broad economic base to create a more resilient and sustainable environment for rural employment.

4.2.47 This new policy highlights key employment sectors which Strategic and Local Development Plans should look to encourage to enable new employment opportunities. Respondents were concerned rural policy omitted reference to the foundational economy; Policy 5 recognises this together with the importance of start-ups and micro businesses. The supporting text describes the foundational economy, drawing attention to tourism, leisure, and food and drink sectors, and the essential role they play in rural areas. Following calls for their recognition, the role of innovative and emerging technology businesses and sectors is mentioned in Policy 5, with the supporting text highlighting how they can create highly skilled and well paid employment in rural settlements. Respondents identified diversification as essential to support the agricultural sector, help tackle the consequences of Brexit, and address working age depopulation. Policy 5 and its supporting text encourage Planning Authorities to consider a wide range of complimentary land uses, policies and criteria to assist the delivery of diversification enterprises in Strategic and Local Development Plans.

4.2.48 The provision or improvement of transport infrastructure and sustainable public transport was raised by respondents, and the Welsh Government responded to most of these points in revised Policy 4. However, in relation to the economy, proposed Policy 5 supports the improvement to strategic transport links between the countryside and large urban areas for mutual economic benefit. Planning Authorities should also support opportunities to improve or develop rural supply chains and distribution networks.

The proposed changes address Conclusions 1, 7, 10, 11 and 12 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.

### **Other rural related issues**

4.2.49 A number of comments alluded to the choice of regions presented in the NDF, in particular that the Mid and South West Wales Region should be split in to two regions. The reasons for this were that the social and economic structures of Mid Wales and South West Wales rural and urban areas were quite different, and a single approach to policy would not work. This issue has been addressed by splitting Mid and South West Wales into two regions, namely through proposed Policies 25-27 on Mid Wales and proposed Policies 28-32 for the South West.

4.2.50 A number of respondents were concerned that Green Belt policies would stop growth taking place in rural areas. The purpose and reasoning behind the Green Belt policies is set out in section 4.7.

## 4.3 DELIVERING AFFORDABLE HOUSING

### Full response form Question 3

#### Question 3

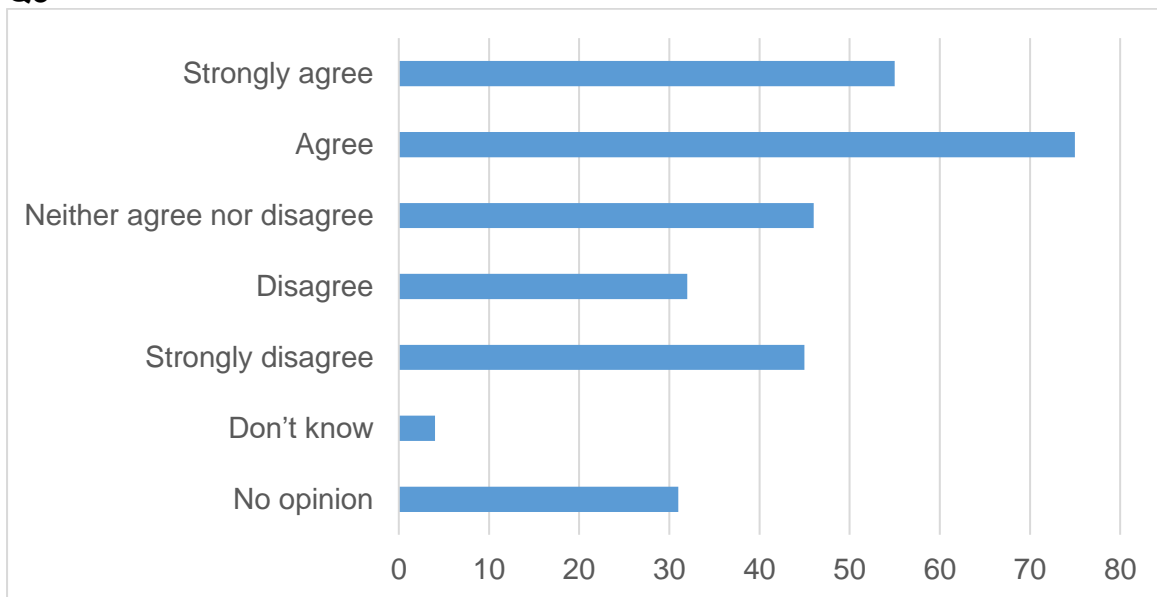
The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

Q3 To what extent do you agree or disagree with the approach to increasing affordable housing?

#### Question 3 - Statistics

4.3.1 Chart Q3 shows the numbers and extent to which respondents agree or disagree with the question. The associated tables show the exact number and percentage of respondents expressing a view.

#### Q3



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion	Total
Number	55	75	46	32	45	4	31	288
Percentage	19	26	16	11	16	1	11	100

### Question 3 – Main Themes

4.3.2 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment. It covers question 3.

Theme	Code	Count
<b>Generally support</b>	Agree with proposals/housing as a national policy/the proposals will provide people with affordable housing/affordable housing important	<b>36</b>
<b>Housing</b>	Involve house builders/private sector in house building/NDF doesn't involve private sector enough	<b>34</b>
<b>Viability</b>	Affordable housing levels unreliable/unrealistic/too high/too expensive	<b>26</b>
<b>Environment</b>	Concerned about the environmental damage of housebuilding/new houses should be eco-friendly/carbon neutral/energy efficient/use green energy sources	<b>25</b>
<b>Housing</b>	Housing need should be decided locally/increase the role or funding of local authorities/town and community Councils/LDPs	<b>25</b>
<b>Plans lacks detail</b>	Housing plans lacks detail e.g. evidence of housing need, supporting rural housing policy	<b>21</b>
<b>Housing</b>	Plans need to include market homes	<b>21</b>
<b>Affordable housing</b>	Not enough focus on those who do not qualify for affordable housing/house prices unaffordable/should not be a focus on subsidised housing	<b>18</b>
<b>Housing</b>	Consider compulsory purchase on empty homes/land/use existing housing stock/under-used housing before building new housing	<b>14</b>
<b>Transportation</b>	Improve road network/transport links to urban centres/acknowledge congestion e.g. M4/ from England	<b>11</b>
<b>Housing needs</b>	NDF assumptions on housing needs wrong/ underestimate needs	<b>11</b>
<b>Quality</b>	Housing needs to be suitable/good quality	<b>9</b>
<b>Housing market</b>	Not enough housing will have negative effects on local economy/young people/health and wellbeing	<b>9</b>
<b>Rural</b>	Avoid building on the countryside/greenbelt	<b>8</b>
<b>Housing needs</b>	Affordable housing levels too low/base line	<b>8</b>
<b>Housing needs</b>	Figures could be interpreted as targets/misleading	<b>8</b>
<b>Housing market</b>	Plans will make housing crisis worse	<b>7</b>
<b>Homelessness</b>	Homelessness should be considered in the NDF	<b>7</b>
<b>House building</b>	Build on existing brownfield sites/urban centres	<b>6</b>
<b>House building</b>	Improve employment/local amenities before housebuilding	<b>6</b>
<b>Affordable housing</b>	Affordable housing should be allocated/built on the basis of need	<b>6</b>
<b>Generally oppose</b>	Generally oppose housebuilding/affordable housing/should not be a priority	<b>5</b>
<b>LA/RSL provision</b>	Registered social landlords/local authorities should increase provision	<b>5</b>

<b>Crime</b>	Concerned about the links between affordable housing and crime	<b>4</b>
<b>House building</b>	Lack of land to fulfil need	<b>4</b>
<b>Joint working</b>	Concerns that local and central Governments are not working together/local planning officers aren't taking into account the NDF	<b>3</b>
<b>Status quo</b>	Current housing policy is sufficient/no need for change	<b>2</b>
<b>Planning processes</b>	Planning processes should be strengthened so that affordable housing remains affordable	<b>2</b>
<b>Other considerations</b>	Consider park homes/caravans in NDF, e.g. to reduce number of holiday cottages, or for use as affordable housing	<b>2</b>
<b>Construction</b>	Consider locally sourced timber framed housing	<b>2</b>
<b>House building</b>	New settlements/towns should be considered	<b>2</b>
<b>Welsh language consideration</b>	Welsh language consideration retaining or/and using Welsh names for developments	<b>1</b>
<b>Housing market</b>	Plans will reduce house prices	<b>1</b>
<b>Affordable housing</b>	Affordable housing isn't truly affordable/still too expensive	<b>1</b>
<b>SDPs</b>	SDPs need to be in place/live	<b>1</b>
<i>Other (unspecified)</i>		<b>36</b>

### Question 3 – Commentary

4.3.3 The following section is a more detailed commentary on concerns expressed by respondents. It also includes selected quotes from respondents, presented in italic, reinforcing those views.

In total, 169 respondents provided comments on the NDF's approach to the delivery of affordable housing. These responses have been grouped into several overarching themes.

The extent to which respondents agreed with the principle of affordable housing provision as laid out in the NDF varied. There was support for the provision of affordable housing in principle, with some specifically stating that a lack of affordable housing would negatively impact on the local economy, young people, health and wellbeing or would encourage outward migration. There was some emphasis that this affordable housing needs to be good quality.

*The NDF sets out the affordable housing 'delivery gap' and the Council is generally supportive of measures to increase the supply of affordable housing.*

*The approach to increasing affordable housing is supported as the approach commits to ensuring that all members of society have access to housing, especially those unable to afford to buy on the market.*

Conversely, there were some who opposed affordable housing provision in general terms, either because they disagreed with the principle of housebuilding itself or because they felt affordable housing should not be a government priority. Additionally, some felt there was no need to change current policy and gave support to the status quo.

*In its current format, the Affordable Housing Policy does not work for Penarth. As such Members believe that increasing affordable housing under the same terms will have little impact in the area.*

*We do not need more homes we need less people*

*What is wrong with current open market system of imposing 20 or 33% affordable housing on new sites, it is working well, if it is not broken do not try to fix it.*

There were concerns that plans for affordable housing, as set out in the NDF, would make the housing crisis worse, for example by relying on projections which don't adequately reflect existing and future levels of need.

*The estimates of housing need assume two key elements: newly arising need is calculated from the 2014 based variant household projections; and existing Unmet need – is said to equate to the sum of both those in homeless accommodation as at latest estimates, and the number of households that were overcrowded and concealed as at the 2011 Census. Each of the underlying variant population projections (underpinning the newly arising need calculation) assume a decline in the working age population (1664) of Wales of between -2% and -7%, and little growth (in some cases decline) in the child age population. By way of comparison, the same projection series for England projects growth of 6.5% in the population 16-64. Use of trend-based household projections in areas of low growth, leads to a perpetual state of decline in the projections over time – demonstrated by the significant ageing of the population (as above). Moreover, calculations of existing unmet need are just that – they fail to take account of ongoing levels of unmet need (homelessness and concealed households) that has occurred since 2011, and which are built into the future household projections.*

Some said that the plans lacked detail or evidence for the outlined strategy while others said the assumptions it made on housing needs were wrong.

*When taking all of these factors into consideration, there is no evidence that the housing need for Wales is currently as low as 8,300dpa, or that it would fall to less than half that figure by 2038. By identifying a reduction in housing need through the Plan period the NDF is, in effect, planning for decline.*

*we are concerned that the NDF is only focused on the delivery of affordable housing and that the levels of affordable housing that are identified as being required in the plan are being presented out of context.*

Others were sceptical about the true affordability of the proposed affordable housing provision.

*...unfortunately most people, especially young people who want to get on the housing ladder cannot afford these so called affordable houses, based on their income*

There were a group of responses which felt that the NDF shouldn't focus on subsidised housing strategies. Others felt that it should also include a strategy for the private housing market.

*there is also an enormous need for open market housing and the NDF does very little to emphasise the importance delivering of both market and affordable housing.*

*We consider it will be essential that a policy framework is put in place that will stimulate all types of house building in Wales and increase the delivery of market housing as well as affordable housing. For example, while the delivery of 3,900 affordable homes per annum would not be feasible under a requirement for 47% affordable housing (out of a total of 8,300 homes), it would be more likely as a smaller proportion of a larger overall housing requirement (e.g. 30% of a total of 13,000 homes). Increasing overall housing delivery would also have the added benefit of improving affordability of open market housing and ensuing a closer alignment between housing and economic growth.*

However, even where there was agreement with affordable housing in principle, this often came with caveats suggesting problems with the NDF's approach. Some of the issues raised by respondents are outlined below.

One set of concerns centred around target-setting for affordable housing. Some suggested that the NDF targets need to ensure that affordable housing is provided on the basis of need. Other concerns were that affordable housing targets were either unreliable, unrealistic, too high or too expensive. It was also suggested that the estimates could be interpreted as targets in LDPs.

*It is considered that the NDF as well as providing a policy on open market housing should also make the same statement about the estimates not being used as a housing target, within the supporting text, as the NDF is the lead policy document which all other plans such as the SDP and LDP's have to be in compliance with. This is a critical point and as currently referenced the housing need figure could be misread as the housing target for Wales.*

For others, the targets were problematic because of a lack of land to fulfil the stated need. As in other sections of this summary report, tensions also arose around the scale at which decisions should be made with some saying that housing need should be decided locally (e.g. within LDPs, by town and community councils).

*The Council supports the aspirations of Welsh Government to increase affordable homes, but the target should be realistic, underpinned by evidence and based on viability. The target of 47% is unrealistic. The viability of a scheme will vary on a site by site basis and will change over the lifetime of a plan in line with changes in economic circumstances. Setting such a high affordable housing target will have a massive impact on the margins of viability and will adversely impact on lower viability areas where it is difficult to encourage development in the first instance.*

*Local Authorities should be encouraged to grant fund affordable homes in those areas where sites are not financially viable but where the need is greatest.*

A third theme revolved around who should provide affordable housing. There were concerns that the NDF doesn't include enough of a role for the private sector in delivering affordable housing, and several detailed objections were raised on behalf of housing developers on this issue. Another suggestion was that Registered Social Landlords and Local Authorities should be responsible for affordable housing provision.

*No support is provided for the delivery of open market housing despite the private sector playing a key role in the delivery of affordable housing in Wales. The Draft NDF is dismissive of private-led delivery of affordable housing*

*When you look at the current delivery of affordable homes, it is clear that the private sector provides a significant proportion. The NDF should be encouraging private sector development because of this to further increase the contribution whilst limiting public sector funding.*

*Traditionally, private house builders have been responsible for delivering a significant proportion of affordable homes (both for social rent and low-cost home ownership) in Wales through Section 106 contributions. For example, for the last five years the private housing building industry have provided over a third of all new affordable homes in Wales (Stats Wales2). If the challenge of delivering record levels of affordable housing units is to be met the contribution of affordable homes through Section 106 planning obligations will remain an important component of this delivery.*

Another set of responses revolved around the impact of housebuilding on the environment. Respondents were either concerned about the environmental damage done by housebuilding or suggested that new builds should be environmentally friendly in some way. There were some specific concerns about housebuilding on the green belt.

*I totally agree with the principle of developing more affordable housing but this housing needs to address the climate emergency. Funding from the Welsh Government to support affordable housing ought to be conditional on the housing meeting a code for sustainable level 5 or 6*

*I agree with the drive for affordable housing BUT, there is a real risk that making a house affordable will strip out its low carbon/ energy saving potentials. I think there is a real opportunity here that all new housing built in Wales is done to the highest and best eco-credentials available. Environmental sustainability of new housing should not come at the expense of a cost cutting exercise to make it affordable. Note that if these are built right, they will need little energy for heating, so low cost to run and a lot more affordable in the long run.*

Alternative suggestions that the NDF should consider were made by some. Some said that the NDF should focus on re-utilising existing houses before building new homes (e.g. compulsory purchases on empty homes). Some suggested that the NDF should consider using park homes and caravans either as affordable housing or to reduce the number of holiday homes and free up housing stock for residents. A small number suggested the use of locally sourced timber framed housing to create affordable housing stock. Some suggested building on brownfield and other urban sites while others suggested the development of new towns or other settlements.

Other comments included: concerns about the links between crime and affordable housing; the fear that affordable housing reduces private house prices; the need for SDPs and strong planning processes to be in place; joined up national and local planning (e.g. a concern that planning officers don't know about or aren't currently taking into account the NDF in their future planning); the need to consider retaining/using Welsh language place names for developments; and the need to develop infrastructure (road networks, employment and local amenities) alongside housebuilding.



## Written Submissions

4.3.4 The following consultation responses were provided as written submissions and did not use either a full or easy-read questionnaire.

Some responses praised the recognition of the elements which contribute to the placemaking agenda within the NDF with regards to delivering additional housing.

*We note that the consultation suggests that public sector and the decisions it takes regarding its land can make a major contribution to shaping places. A key aspect of any effort to deliver any additional housing regardless of tenure, should be how the process contributes to the placemaking agenda, by developing resilient ecosystems, and improving the health and well-being of our communities. We welcome that there is a clear and strong recognition of the elements that together combine to help people prosper where they live.*

### Housing

While many of the comments in submissions reflected themes raised in the main consultation questionnaire – such as considering housing quality when building affordable housing and ensuring that it (or new council housing in general) is green/energy efficient – some submissions expanded on these themes in great detail or related them to wider policy considerations. These, and the other comments or concerns raised in the submissions are summarised below.

The comments on the draft approach to affordable housing tended to centre around the availability of land and suitability of locations for development; how new developments would or should integrate within existing communities and infrastructure; how to future-proof affordable housing so it could only be used for this purpose moving forwards; particular ways of providing affordable housing including supporting the use of housing co-operatives, creating approved contractor lists, and other advice on the specifics of housing development and planning.

A joint response submitted on behalf of The Environmental Network Pembrokeshire considered location for housing developments as part of wider concerns about the climate emergency and related increased flood risk around coastal areas. Consequently, they called for a complete reappraisal of Welsh land use plans. Others made similar comments about considering the implications of climate change on areas for future development.

*We need a complete reappraisal of Welsh land use plans, with unprotectable areas identified; to maintain the human and economic viability of communities, the NDF must steer the relocation of • roads & railways • other infrastructure • housing • businesses.*

#### The Environmental Network Pembrokeshire

*Welsh Government has declared both climate change and ecological emergencies. These have major implications for coastal, estuarine, open land and built up areas and will inevitably impact on future development choices. In the revision to this draft you may wish to consider delineating river catchment areas, strategic areas for woodland growth and biodiversity protection and enhancement*

## **Private individual**

The Wales Co-operative Centre too felt that land for development needs to be reconceptualised in terms of long-term land value, not only to help promote housing co-operative affordable housing but also to address the climate emergency.

*The New Economics Foundation suggest that shifting focus from one off sale value to the best long term value for land would lead to wider social benefits. It suggests working with long term equity investors such as pension funds or community led projects to directly fund affordable developments. Hopefully the NDF will help guide investment decisions which address climate change mitigation and adaptation, as we move towards zero carbon, in this Climate Emergency.*

## **Wales Co-operative Centre**

Other land considerations for affordable housing included considering the land quality – for example not using contaminated land which can have hidden additional costs.

*The quality of the public sector land for house building is of paramount importance. Only when this is assured can the delivery of production begin. Mitigation needs to occur to speed up the land available for house builders. This is particularly relevant in the case of brownfield sites, which may previously be contaminated land, and can involve significant risks with geotechnical and contamination issues often contributing to unforeseen costs and obstacles during remediation.*

## **NHBC**

Aside from these concerns, there were multiple responses which were sceptical of the availability of land for increased affordable housing development. Submissions were also cautious of the restrictions that greenbelt designation would place on rural development or changes in building use. Monmouthshire was highlighted as an area where restrictions in development could impact in particular due to migration from Bristol.

*Policy 3 emphasises the importance of publicly owned land in delivering development including for mixed use and affordable housing. Whilst this is welcomed in principle, it is considered that there is not a significant amount of Council owned land available for development, particularly in town and city centre locations*

*Many Local Authorities are already identifying available land to deliver Affordable Housing, schools, infrastructure improvements and other corporate projects. However, Local Authorities also use the receipts from land disposal to deliver other strategic objectives such as the 21st Century schools programme. Welsh Government need to support Councils financially to deliver this agenda if land receipts are going to be reduced to support other policy initiatives.*

## **Planning Officers Society Wales (POSW)**

*Monmouthshire has a range of urban and rural settlements which all require a minimum of proportionate growth during the NDF period. The NDF fails to recognise this, and focusses development into the valleys, and attempts to restrict development in Monmouthshire to an unreasonable level. There will inevitably be a significant migration from the city of Bristol into the county of Monmouthshire due to rises in property prices in Bristol and the abolishment of the Severn Bridge tolls. The Welsh*

*Government should not deter this movement of people into Monmouthshire, because it will in time bring the average age of the demographic of Monmouthshire down. As a county, Monmouthshire has a large aging population, with a significant lack of younger people to support the older generation. The Monmouthshire County Council Growth and Spatial Options consultation clearly identified the need for housing and the migration of people from Bristol.*

#### **Powells Chartered Surveyors**

Similarly, some called on the Welsh Government to release more brownfield sites for development, including for both public and private ownership. Others cautioned against prescriptive guidance on the creation of 'new towns', and flagged inconsistencies on this point with the PPW. Several were supportive of an approach where new settlements could be considered in-line with PPW guidance.

*The draft NDF [...] is in conflict with, and as a result comes to the wrong conclusion, with the guidance which allows New Settlements to be considered as an option in both Planning Policy Wales and the Development Plans Manual [Edition] 3 (Consultation Draft June 2019)*

*The opportunity for employment in close proximity to new residential areas combined with immediately adjoining public transport infrastructure (rail links) to facilitate transport to larger settlements, especially where such sites involve significant elements of brown field development, provides opportunity for development on a sustainable basis. Far more sustainable in some circumstances than simply extending existing development (with all of the disadvantages that can sometimes result in).*

#### **Watts and Morgan LLP**

*The NDF Strategy appears to dismiss the potential for sustainable new settlements. However, it is quite feasible that the most sustainable form of development could be a new settlement outside existing settlements rather than increasing development in settlements where infrastructure and quality of life are already challenged. This policy does not allow this form of development and as such could perpetuate less sustainable development. Planning Policy Wales (PPW) sets out the exceptional circumstances where new settlements may be appropriate. The NDF should reflect the policy advice in PPW and recognise there may be a role for new settlements if they create more sustainable places than urban sprawl at the edge of existing settlements. Such matters should be given detailed consideration as part of SDP and LDP strategies.*

#### **Planning Officers Society Wales (POSW)**

Other than new settlements, location of development was important for some, with growth areas seen as having the potential to draw money away from smaller communities towards Cardiff, and reduce the time spent within the communities. The creation of "anchor towns" with substantial populations within a 15 to 20-minute commute were seen as a solution to these issues and bolstering local regeneration.

*Co-locating homes, jobs and services in cities and large towns seems sensible as a means of focusing sustainable growth. However, we would urge that there is a geographical spread of large towns. For example, we would like to see towns in the valleys included rather than a focus on Cardiff. Creating economic opportunity in local*

*neighbourhoods means that economically active individuals will remain within the community full time to spend money and contribute to community cohesion. In contrast, encouraging commutes to Cardiff will lead to jobs and money leaking out of local areas. To help address this, we welcome the Bevan Foundation's proposal for anchor towns. Towns with substantive populations within fifteen to twenty-minute travel times, anchor institutions and key infrastructure have potential to become "Anchor Towns" that could drive local regeneration and act as a brake on the outflow of people and expenditure*

#### **Wales Co-operative Centre**

Meanwhile others suggested alternative approaches of meeting affordable housing targets or achieving sustainable communities, including facilitating community-led or co-operative housing, settlement hierarchy or integrated cluster of communities approaches. Further suggestions around affordable housing included avoiding the use of private developers due to poor delivery rates historically, or having approved contractor lists, as well as enforcing quality standards on properties (such as NHBC standards or equivalent) and having them inspected and warrantied.

*I think there should be a fundamental recognition that this housing must be set within the framework of cohesive and sustainable communities. A settlement hierarchy approach at the strategic planning stage may be sensible but within parts of Wales an integrated cluster of communities approach may be more appropriate to the social geography*

#### **Private individual**

Finally, there were some suggestions that Welsh Government needs to have greater political powers to address empty or second homes and holiday rentals or to prevent affordable housing being bought and sold at market prices further in the future.

### **Welsh Government Response – draft Policy 5: Delivering Affordable Housing**

- 4.3.5 Estimates of housing need are key to future planning at a national, regional and local level. The Welsh Government's latest estimates indicate that the provision of affordable homes should become a key focus of housing delivery both at a national and regional level and this is reflected in the NDF. The final version of the NDF will include updated estimates. As a result of other changes this policy will be renumbered Policy 7.
- 4.3.6 The methodology for calculating the Welsh Government's Estimates was adopted following advice from analytical and policy experts from both the Welsh Government and Local Government. The methodology has also been assessed as robust by an independent expert in demographic projection and housing who briefed Assembly Members on this matter. The Estimates do not reflect future policies or events and are not a housing target for Wales or the regions. The Estimates provide part of the evidence and context which informs the housing requirements established through Strategic Development Plans (SDPs) and Local Development Plans (LDPs). It will remain for local

planning authorities to determine and justify their housing requirements either through their SDPs or LDPs. Proposed additions to the 'Delivering Homes' section of the NDF will clarify these matters.

4.3.7 The Welsh Government recognises that private sector house-builders play an important role in addressing housing needs, including contributing to the delivery of affordable housing. The Welsh Government will continue to work with house-builders on the delivery of private sector housing. However, in order to address the significant need for affordable homes identified in the Welsh Government's Estimates of housing need, the focus of the NDF is on the role of local authorities and registered social landlords in increasing the number of affordable homes provided in Wales. Proposed amendments to the text supporting the policy on 'Delivering Affordable Homes' will recognise the contribution of new market homes in addressing housing need more broadly.

4.3.8 The NDF recognises that the public sector, including the Welsh Government and local authorities, has an important role in increasing the delivery of affordable homes. The role of local authorities, registered social landlords and SME builders in achieving this increase in the supply of affordable homes is explicitly referenced, along with the reuse of publicly owned land. In addition, it is proposed that the policy in the draft NDF on 'Public Investment, Public Buildings and Publicly Owned Land' (draft Policy 3) will be broadened to cover 'Public Sector Leadership'. The revised policy will commit the Welsh Government to taking an active role in the provision and enabling of development and make specific reference to increasing the delivery of social housing and to the role of smaller developers. The revised policy will also refer to the need for planning authorities to take a proactive role in identifying the right locations for development and in determining the best means of developing these sites.

4.3.9 Taking account of the environmental impact of new housing is a key element for planning authorities in determining which sites are suitable for housing and in assessing individual planning applications. The related issues are addressed in detail in *Planning Policy Wales*.

The proposed changes address Conclusions 23, 24, 25, 26 and 28 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.

## 4.4 MOBILE ACTION ZONES

### Full response form Question 4

#### Question 4

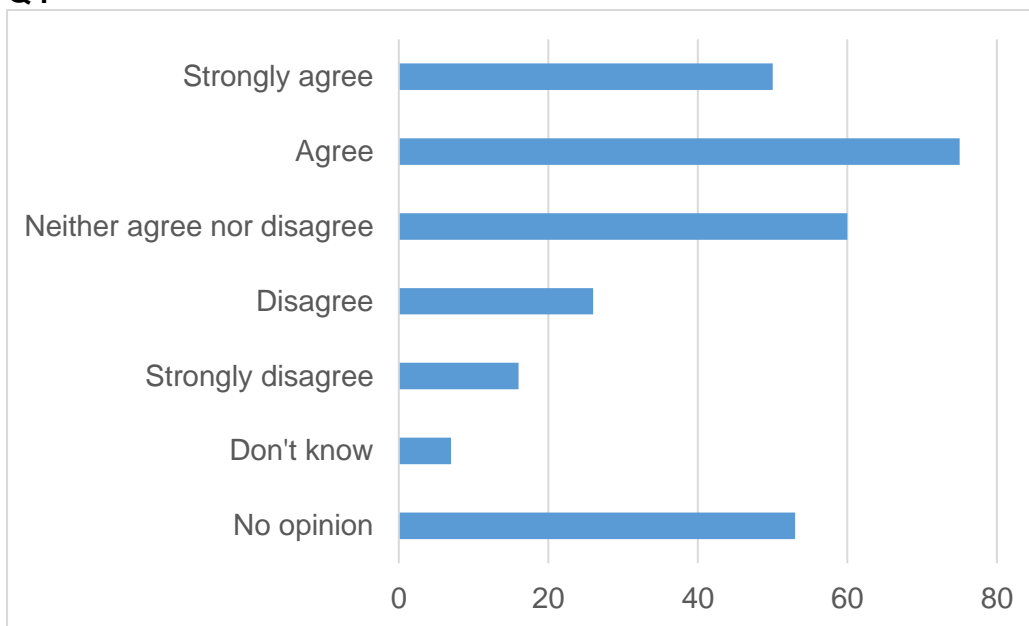
Q4 To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

#### Question 4 - Statistics

4.4.1 Based on the question above, Chart Q4 provides a visual representation of numbers of respondents agreeing or disagreeing with the question. The associated tables show the exact number and percentage of respondents expressing a view.

#### Q4



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion	Total
Number	50	75	60	26	16	7	53	287
Percentage	17	26	21	9	6	2	18	100

## Question 4 – Main Consultation Themes

4.4.2 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment. It covers question 4.

Theme	Code	Count
<b>General support</b>	Agree there is a need for better mobile phone coverage/have experienced poor coverage	<b>39</b>
<b>Plans lack detail</b>	E.g. identification/map of action zones/need more information on action zones/should be a consultation on where these zones will be	<b>14</b>
<b>Health</b>	Concerned about health impacts of 5G	<b>11</b>
<b>Environmental concerns</b>	The environmental impact/damage to landscape from masts should be considered/5G uses more energy/is worse for the environment	<b>10</b>
<b>Plans don't go far enough</b>	All of Wales should be an action zone for improvement/enforce universal service/coverage for minority areas	<b>10</b>
<b>Economy</b>	Improved network coverage important for business/should be focussed to benefit business/economy	<b>9</b>
<b>Local democracy/ decision making</b>	Decisions on mast placement should be locally taken	<b>5</b>
<b>Viability</b>	Don't believe proposals will happen in reality	<b>4</b>
<b>Co-operation</b>	Encourage/enforce co-operation between mobile telephone operators/co-operation would require fewer masts to be built	<b>4</b>
<b>Viability</b>	Incentivise mobile phone operators/won't get backing of private operators unless it is profitable/can't force operators to improve coverage in rural areas	<b>4</b>
<b>Targeting coverage</b>	Coverage should be targeted on the basis of need/to communities which would most benefit	<b>4</b>
<b>General opposition</b>	Generally oppose 5G	<b>3</b>
<b>Viability</b>	Requires funding commitment/fair funding to be successful	<b>3</b>
<b>Infrastructure</b>	Consider grid infrastructure requirements before building 5G	<b>3</b>
<b>Alternative Suggestions</b>	Plans should include internet/not limited to 5G/should look to longer-term technological innovations	<b>3</b>
<b>Wording</b>	Wording changes e.g. use of the word "significant"	<b>3</b>
<b>Community benefits</b>	Improved network coverage important for community/education/deprived communities	<b>2</b>
<b>Positive</b>	Plans safeguard landscape/protect environment	<b>2</b>
<b>Prioritisation</b>	5G/increased mobile phone coverage should not be a priority	<b>2</b>
<b>Other</b>	Already covered in PPW/should just be included in PPW/this is not a new policy	<b>2</b>
<b>Guidance</b>	Need to provide additional guidance e.g. on antenna siting	<b>1</b>
<b>Alternative Suggestions</b>	Use satellites	<b>1</b>
<b>Other (unspecified)</b>		<b>11</b>

## Question 4 – Commentary

4.4.3 The following section is a more detailed commentary on concerns expressed by respondents. It also includes selected quotes from respondents, presented in italic, reinforcing those views.

80 respondents commented on mobile phone coverage. While the question asked about other ways of improving mobile phone coverage, the most frequent comments shared experiences of poor mobile phone coverage across Wales, or agreed that this is an area for improvement. Linked to this were suggestions of the economic benefits of improved coverage, as well as less frequent suggestions that it would lead to improvements in education or benefit deprived communities.

*The policy intent to improve mobile coverage and to better position the plan-led planning system in Wales to help facilitate improvements is understood and supported.*

*I can't get any signal where I live, it's ridiculous*

*If Wales is to compete in the 21st century then better mobile infrastructure is vital to the growth of SMEs and to attract and retain people in work and leisure settings.*

Nevertheless, 11 respondents expressed concerns about potential health impacts as a result of increase in telephone masts, stations or extended coverage. One suggested using satellites instead.

*Use satellite. The masts are [not a] great idea as the frequency they emit are considered dangerous to human brains.*

*Care must be taken NOT to locate base stations close to residential properties, where perceived health risks and a loss of amenity for the householders are a major factor. New masts should be located well away from homes, and not imposed without local consent.*

*The Community Council would like it to be noted that there is a need to assess any health implications when extending coverage.*

A further 10 people were concerned about the impacts of new telephone masts on the landscape. Other areas of disagreement involved the identification of where the mobile action zones would be. Common requests were for a map of the action zones, information about when these action zones will be identified, or the criteria used to identify them and fund the improvements. Another comment queried whether there is an expectation for SDPs and LDPs to deal with Mobile Action Zones and requested that the NDF links to PPW.

*It is disappointing that these action zones are not identified, though it is understood that they will change over time.*

*These zones are not yet identified but should be included in the finalised NDF or an explanation added with regards to where such zones will be published to provide clarity to the policy. It is comforting that the NDF recognises the importance of the landscape, LPA's have designated Special Landscape Areas which should form the basis of assessments of landscape impacts.*



*We call for a spatial approach and where possible the same level of detail as that set out for wind and solar. Without this detail questions are raised around how and when the zones will be identified. Would they form part of the NDF or a separate document? Alternatively, does this mean that it is the expectation that SDPs and LDPs should deal with Mobile action Zones in policy terms? Again, we would expect the NDF to set out any links with PPW on this matter.*

Linked to this were feelings that mast placement should be decided locally, rather than by telecom companies, and a comment requesting greater guidance on mast siting, similar to Scottish Government planning advice.

*What is also needed is local knowledge and consent to siting of telecom masts. "Significant adverse landscape impacts" are a matter for local planning, not telecom businesses.*

*Give local people a say in the siting of phone masts. This is too important to be left to telecoms companies who exist solely to make a profit, not consider the opinions of local users*

*We suggest that some urban and rural siting and design guidance will be required, along the lines of that provided in the Scottish Government's Planning Advice Note PAN62, which contains many examples of sensitive siting and design practice.*

Some respondents opposed the notions of Mobile Action Zones altogether and felt that improvements to coverage should be a target for the whole of Wales, rather than just to specific areas of particularly poor coverage, or that the plans should not be limited only to 5G, but also to broadband or planning for future technologies.

*There is no commercial reason for operators to spend large sums for few customers. Only when 100% coverage is imposed on the likes of BT will we see improvements.*

*The idea of separate zones shouldn't really apply in this scenario. Although the solution of the mobile action zones is a valid one it really needs to be a National Solution with all areas in Wales being digitally connected no matter where you are if we want to move technological innovation forward as standard practice.*

*Policy 6 needs to be extended beyond mobile phones - reference needs to be made to broadband and internet things infrastructure (along with any other new technology which will become apparent during the NDF period). One intervention in the implementation in the short/medium term is the Mobile Phones Action Zone; the policy should be more long-term. The Council considers that having a general policy for digital infrastructure connectivity which includes but isn't limited to Mobile Phones would be more beneficial for the future.*

*Look beyond 2040, what will be the new technologies replacing current mobile networks? Invest in appropriate research.*

A small proportion of the comments felt that mobile phone coverage was not an important enough issue to be considered by the NDF or felt that this should be dealt with through PPW instead.

*This isn't exactly the biggest issue facing this country - what about the M4 relief road?*

*LDPs are required to provide a spatial expression to any policy with a spatial link. The NDF should not be treated differently in this respect. Therefore, as these zones are yet to be identified, it is considered that this policy advice would be better expressed through PPW.*

Others were concerned about the plan's viability, with many sceptical of telecoms providers' willingness to work with the Welsh Government to achieve their aims. Some suggested incentive payments or funding commitments would overcome this issue, while others suggested Welsh Government should force providers to co-operate or share masts in order to improve coverage.

*The aspiration of the policy is fine, but I don't see how the private mobile phone companies can be persuaded to provide better coverage in the rural areas where it is not cost-effective for them to invest in better equipment etc. Will the Welsh Government be giving the mobile phone providers financial incentives to improve the coverage, and if so, how will that be funded? The policy seems unrealistic to me, as I don't see how it could be achieved.*

*Don't see how anything the Welsh Government can do will make commercial mobile phone providers improve access in rural areas where it is not cost-effective for them to do so.*

*The best way to encourage mobile coverage is to require that all providers allow intercompany roaming meaning that duplication and triplication of coverage is eliminated.*

*Enhanced co-operation between mobile phone operators is also necessary to ensure that a multiplicity of transmission masts does not result. IN addition, sharing resources between operators is clearly required.*

*There is a need to require pre-application discussions with stakeholders on the network planning and individual applications, including where there is scope for shared solutions to avoid multiple different masts within the same area.*

## **Written Submissions**

4.4.4 The following consultation responses were provided as a written submission and did not use either a full or easy-read questionnaire.

### **5G infrastructure and Mobile Action Zones**

Several responses were received from telecoms operators regarding the importance of mobile, its interconnectedness with all of the NDF outcomes, and the viability of increasing 5G infrastructure.

Mobile UK pointed out the high proportion of people with mobile devices, stating that 18% of people, often in lower-income brackets, live in a 'mobile only household'. They went on to outline mobile's economic, social and environmental value and role in employment flexibility, innovation, travel, and reducing pollution and carbon consumption. To that end, they requested changes to wording in policies 3 and 4 to reflect mobile's importance.

Three UK and Vodafone UK supported Mobile UK's submission in agreeing that the planning regime needs to be reformed in order to realise the benefits of 5G network upgrades and deliver Shared Rural Network (SRN) targets. This was also requested by BT Group. These included permitting larger masts in order to require fewer of them; having prior approval required only for ground-based masts, not building/rooftop-based apparatus; and alignment with fixed telecom operators as to what is permitted concerning street cabinets and vertical structures.

Meanwhile, BT Group also suggested aligning planning processes with England concerning 4G and 5G mobile infrastructure and supporting the development of a mature 4G infrastructure as a precursor to 5G deployment. In addition to planning reform, they also suggested delivery of the broadband USO (Universal Service Obligation) as a safety net for households that cannot access adequate digital connectivity and public funding.

Additionally, Three UK and Mobile UK and BT Group all supported updating the Code of Practice/Technical Advice Note 19 in order to aid network development and in some cases offered to assist Welsh Government with this.

## **Welsh Government Response – draft Policy 6: Planning in Mobile Action Zones**

- 4.4.5 Responses to draft Policy 6: Planning in Mobile Action Zones and to improvement of mobile phone coverage across Wales were mostly supportive and considered beneficial to the economy, communities and individuals. The main concerns raised were that no maps of the Zones had been provided, there was insufficient discussion of the importance of digital communications in Wales, health and environmental impacts of mobile phone masts should be addressed, and benefits of Mobile Action Zones should be extended across the whole of Wales. As a result of other changes, Draft Policy 6 will be renumbered Policy 14.
- 4.4.6 The identification of zones is ongoing, which is why the NDF has been unable to present maps. Consequently the wording of the draft policy has changed slightly because without maps the Welsh Government is unable to undertake a full Impact Sustainability Assessment or Habitat Regulations Assessment. However, the policy continues to support, and add weight to, the principle of Mobile Action Zones across Wales, and the Welsh Government and Planning Authorities will work with mobile operators to create the right environment within these Zones to deliver improved coverage.
- 4.4.7 Proposed Policy 13 Supporting Digital Communications is a new policy, added to support the delivery of digital communications across Wales (see below).
- 4.4.8 Issues concerning mobile telecommunications and health are set out in Planning Policy Wales Chapter 5 Productive and Enterprising Places. Provided development meets the International Commission on Non-Ionising

Radiation Protection (ICNIRP) guidelines, Planning Authorities should not consider the health aspects of mobile telecommunication equipment. The Welsh Government continues to monitor these guidelines.

- 4.4.9 It is not considered feasible or necessary to roll out Mobile Action Zones to cover the whole of Wales or to provide a universal service. The market provides coverage for most of Wales; a targeted initiative aimed at areas of little or no coverage is more effective.

### **\* New Proposed Policy 13 - Supporting Digital Communications**

- 4.4.10 Proposed Policy 13 Supporting Digital Communications has been added to address calls that the NDF has insufficient reference to digital communications and failed to emphasise its importance to the Welsh economy, its communities and individuals.

- 4.4.11 The policy itself supports the delivery and improvement of both telecommunications and broadband infrastructure and services. It states Planning authorities must engage with digital infrastructure providers to identify the future needs of their area and set out policies in Strategic and Local Development Plans to help deliver this.

- 4.4.12 The policy also states that new developments should include the provision of 'gigabit capable' broadband infrastructure from the outset. By this we mean infrastructure to allow properties to easily link to current and future fast broadband services.

- 4.4.13 The supporting text emphasises the importance of digital communications to the future success and economic competitiveness of Wales's businesses, and to community and individual needs including access to key services and facilities. Little or no digital coverage can disadvantage local businesses, communities and individuals both economically and socially and can contribute to deprivation, social isolation, and lack of wellbeing particularly in rural areas.

**The proposed changes address Conclusion 1 and 33, from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.**

## 4.5 LOW EMISSION VEHICLES

### Full response form Question 5

#### Question 5

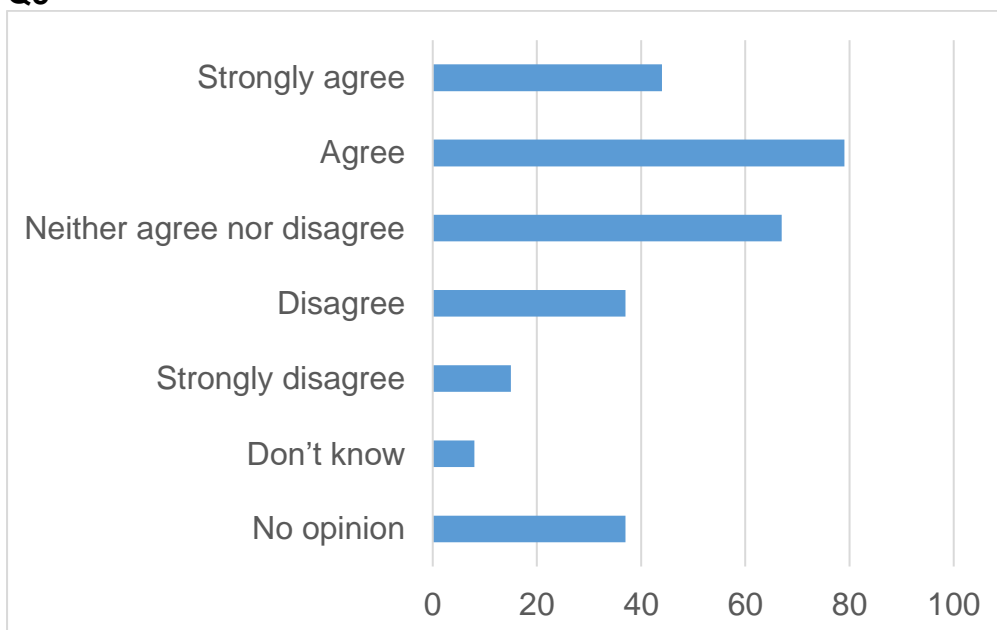
Q5 To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

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

#### Question 5 - Statistics

4.5.1 Chart Q5 shows the numbers and extent to which respondents agree or disagree with the question. The associated tables show the exact number and percentage of respondents expressing a view.

#### Q5



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion	Total
Number	44	79	67	37	15	8	37	287
Percentage	15	28	23	13	5	3	13	100

## Question 5 – Main Consultation Themes

4.5.2 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment. It covers question 5.

Theme	Code	Count
<b>General support</b>	Generally support plans/plans will improve air quality/be good for health/the environment/is important	<b>33</b>
<b>Viability</b>	Need sufficient charging ports/infrastructure to increase take up of electric vehicles	<b>29</b>
<b>Rural</b>	Plans need to emphasise provision in rural areas/plans need more detail on implementation in rural areas	<b>23</b>
<b>Public transportation</b>	Public should be encouraged to use green public transport/active travel/electric bikes, rather than private electric vehicles	<b>20</b>
<b>Viability</b>	EVs will push up energy demand/put too great demand on the grid/Renewable energy won't meet demand	<b>20</b>
<b>Viability</b>	Charging infrastructure too expensive to build/too difficult to place in rural communities/on terraced streets	<b>19</b>
<b>Viability</b>	Charging infrastructure will be greater than the demand for electric vehicles/electric vehicles too expensive for wide-spread use	<b>19</b>
<b>Viability</b>	Wait for EV technology to become cheaper/technology to evolve first/charging infrastructure may become redundant/batteries need to become more efficient	<b>12</b>
<b>Environment</b>	Electric vehicles aren't green/concerns about additional environmental damage caused by electric vehicles e.g. battery production	<b>10</b>
<b>Viability</b>	Needs adequate funding to succeed	<b>9</b>
<b>Alternative suggestion</b>	Invest in hydrogen powered vehicles instead/hydrogen power more environmentally friendly than lithium batteries	<b>9</b>
<b>Other suggestions</b>	All new homes/developments should be built with charging points	<b>8</b>
<b>Guidance</b>	Need to provide additional guidance on charging port locations/siting requirement/voltage requirements/preserving historic streets/who would be responsible for construction	<b>7</b>
<b>Viability</b>	Don't believe plans are achievable in reality/not by 2040	<b>6</b>
<b>Location</b>	Need greater detail on locations of charging stations/priority areas for charging infrastructure/charging infrastructure should be located strategically//on major road corridors	<b>6</b>
<b>Policy should be expanded</b>	To include/consider HGVs and other heavy transport /rolling this out to larger or agricultural vehicles will pose challenges	<b>5</b>
<b>Alternative suggestion</b>	Incentivise/encourage carpooling	<b>5</b>
<b>Policy should be expanded</b>	Create national charging infrastructure plan e.g. do not rely on Local Authorities	<b>4</b>
<b>Priority</b>	Should not be a priority for Welsh Government/Wales can't make a difference on this issue/should be Westminster	<b>4</b>

	decision only/there are other things which are greater priority for spending money/this is not an appropriate focus for the planning system	
<b>Environment</b>	Need green electricity production first	<b>4</b>
<b>Proposals lack clarity</b>	Other (e.g. data connectivity, links to growth in urban centres)	<b>4</b>
<b>Air quality</b>	NDF should include reference to air quality/proposals won't solve air quality problems/won't improve air quality in the short term	<b>4</b>
<b>Other alternative suggestions</b>	E.g. Ban non-essential air travel/ Involve the third sector/consider fossil fuel efficiencies/driverless cars	<b>4</b>
<b>Proposals lack clarity</b>	What constitutes electric vehicle/low emission vehicle/do proposals include hybrid vehicles?	<b>3</b>
<b>Other</b>	Consider the wellbeing of future generation act/WOFGA hasn't been taken into account	<b>3</b>
<b>Other</b>	Welsh Government/local authorities should lead the way/put this into practice first/develop this themselves	<b>3</b>
<b>Policy should be expanded</b>	Create new laws for local authorities to implement/generate income from charging infrastructure	<b>2</b>
<b>Congestion</b>	Proposals need to consider congestion issues/could make congestion issues worse	<b>2</b>
<b>Local need</b>	Tailor delivery to local need/local circumstances	<b>2</b>
<b>Viability</b>	Industry/private sector won't build infrastructure without sufficient demand/will need subsidies/uptake of EVs is dependent on factors outside of WG's control	<b>2</b>
<b>Parking</b>	Plans need to consider provision for those with/without off street parking	<b>2</b>
<b>South East Wales region</b>	Plans will most benefit South East Wales region/will be implemented here most easily/too much funding will be on the South East	<b>2</b>
<b>Alternative suggestion</b>	Invest in vehicle scrappage schemes	<b>2</b>
<b>Alternative suggestion</b>	Charging pads in roads to charge vehicles as they drive/electromagnetic induction	<b>2</b>
<b>Alternative suggestion</b>	Co-locate homes, jobs and services to lower environmental impact	<b>2</b>
<b>Alternative suggestion</b>	Explore/pair with community energy ownership	<b>2</b>
<b>Proposal lacks detail</b>	General (non-specific)/should be more action orientated/measurable	<b>2</b>
<b>Other</b>	Already covered in PPW/should just be included in PPW/this is not a new policy	<b>2</b>
<b>Other</b>	Consider impact to tourism sector	<b>2</b>
<b>Other</b>	Consider inter-operability/universal chargers/electric vehicles all have their own chargers	<b>2</b>
<b>Policies/legislation</b>	Take into account other policies/legislation e.g. Highways act/building regulations	<b>2</b>
<b>Transport</b>	Improve transport corridors/connections between north and south/to urban areas	<b>2</b>
<b>Policy should be expanded</b>	Introduce this more quickly than planned	<b>1</b>

<b>North/West Wales</b>	Plans need to emphasise North/West Wales/North and West Wales most in need of improvement	<b>1</b>
<b>Equalities</b>	Will negatively affect a vulnerable group, e.g. older people/older people more reliant on private vehicles/less affluent to buy to EVs	<b>1</b>
<b>Other</b>	Private sector will need sufficient monitoring for the pace of charging infrastructure roll-out	<b>1</b>
<b>Other</b>	protect development from international companies/keep developments Welsh	<b>1</b>
<i>Other (unspecified)</i>		<b>20</b>

### Question 5 – Commentary

4.5.3 The following section is a more detailed commentary on concerns expressed by respondents. It also includes selected quotes from respondents, presented in italic, reinforcing those views. It covers question 5.

Policy 7 proposes the roll-out of electric vehicle charging infrastructure in order to encourage uptake of ultra-low emission vehicles. While a small set of opinions said that creating the charging infrastructure for ultra-low emission vehicles should not be a priority for Welsh Government, many people supported this policy in principle with some specifically saying that this would bring improvements to air quality, health and the environment more generally.

*We welcome the Welsh Government's support for the development of an EV charging network and for encouraging EV uptake.*

*[Organisation Name] fully supports the roll-out of charging infrastructure to support the transition to greater use of ultra-low emission vehicles*

In many cases, agreement in principle came with caveats or suggestions for developing the policy, which are discussed below.

Some objections to the policy suggested that the proposals lacked detail, either in terms of outcomes needing to be more measurable/action-oriented or in terms of the definition of an ultra-low emission vehicle.

*There seems to be a lack of clarity that 'ULEV' embraces much more than electric and hybrid vehicles, ULEVs are currently defined as having less than 75 grams of CO2 per kilometre (g/km) from the tail pipe. The NDF needs improved clarity on when it is referring to electric and hybrid vehicles and when to the wider definition of ULEVs.*

Similarly, some suggested that the policy should not just focus on cars but also on HGVs and agricultural vehicles, for example. However, it was noted that change will take a long time, especially for agricultural vehicles so that intermediate solutions (e.g. hybrid vehicles) may be required.

There were also concerns that the NDF doesn't acknowledge other policies that cross-over with these proposals (e.g. Well-being of Future Generations Act; Planning Policy Wales; Highways Act; building regulations).

*Given the positive contribution that Electric Vehicles are expected to be able to make to the decarbonisation agenda, it would be good to see the NDF being more*



*specifically integrated with the Environmental (Wales) Act 2016 and the Wellbeing of Future Generations (Wales) Act (2015).*

*In my view the Policy and the supporting text should be in PPW and not the NDF.*

Many responses centred around various aspects of the proposal's viability, and in particular the charging infrastructure associated with it. While some said it was crucial to develop enough charging points to make electric vehicles a viable option and increase their uptake, others felt that electric vehicle uptake would always be at such a low level that demand would never justify the infrastructure. There were also concerns that it would be too expensive to build the charging infrastructure, especially when taking into account installation in difficult locations, such as rural areas and terraced streets.

*the technology is not sufficiently advanced to make this a viable and reliable option in remote rural areas. Most electric vehicles are currently only capable of driving around 100 miles before battery recharging, whereas the best can achieve up to 250 miles. However, this range is greatly reduced if the journey included steep hills and inclines. It is unlikely that governments can justify the infrastructure investment required to support the introduction of ultra-low emission vehicles to rural areas*

There were suggestions that the policy needs to provide more guidance in terms of locating charging points, for example: more technical detail; outlining responsibility for construction; designating Priority Areas for construction; stating where points should be located; and consideration of how charging points should be sited in sensitive historical areas. Perhaps related to the fact that many concerns were about the operating of the whole charging network, there was some feeling that the infrastructure plan should be developed nationally rather than devolved to local authorities.

Suggestions that the plans need adequate funding to succeed may relate to other concerns that infrastructure wouldn't be built by the private sector without commercial viability or subsidies, and that any private sector rollout would also need adequate monitoring. The possibility that the building work was given only to Welsh companies was also raised.

Some felt that the plans were not achievable either in general or within the set timeframe. A group of concerns suggested that technology was not yet adequate to ensure the viability of either electric vehicles or the charging infrastructure to support them. There were also concerns that would not be enough energy in the grid to meet the demand of an increased number of electric vehicles. Some people said this was particularly the case if electricity in the grid was generated by renewable sources. Possibly related to a number of the above concerns were suggestions that factors for success would be out of Welsh Government control.

*As mentioned above, [organisation name] have reservations about the roll out of ultra-low emission vehicles, including electric vehicles, as members believed that the technology is not sufficiently advanced to make this a viable and reliable option in remote rural areas.*

A group of people felt that an increase in the number of electric vehicles would make congestion worse. Others raised the need to focus on alternative transport strategies. These included: green public transport; active travel; public electric bikes; or carpooling. There were also concerns that policy 7 is not environmentally friendly. These concerns included: battery production is environmentally unfriendly; there needs to be a parallel focus on green

electricity production; and that the proposals wouldn't solve urgent air quality issues in the short term with the NDF needing to include a focus on air quality.

*It is widely recognised that an all-electric transport future can't be delivered quickly due to cost and charging infrastructure constraints so will not solve air quality problems in the short term.*

There were concerns about differential impact of the policy proposal which can be broadly generalised as a concern that urban South East Wales will benefit from the policy more than rural Wales, with particular reference made to North and West Wales. Concerns about the negative impact on rural areas have already been discussed. It was felt that the NDF needed to recognise the different needs of these different areas and provide funding and detailed plans that avoided unequal outcomes. Along these lines, there was a suggestion that plans needed to be developed locally to take account of local needs while others suggested laws to allow local authorities to develop the infrastructure, possibly making an income from it. Across the responses, a tension can be seen therefore, between preferences for local and national control of the infrastructure. Another group of concerns were around differential impact on the population, with suggestions that proposals were less likely to benefit older and less affluent members of the population.

Alternative suggestions to the policy were made by some respondents. These included: investing in hydrogen powered vehicles; all new homes being built with charging points; banning non-essential air travel; involving the third sector; considering fossil fuel efficiencies; investing in a vehicle scrappage scheme; considering the use of electromagnetic induction charging pads in roads to charge electric vehicles as they move; co-locating homes, jobs and services to lower environmental impact; and exploring ideas of community energy ownership.

Finally, a group of other suggestions included: consideration of charging provision for those without off-street parking; impact to the tourist sector; the need to tie this in with improved Welsh transport infrastructure.

## **Welsh Government Response – draft Policy 7: Ultra Low Emission Vehicles**

- 4.5.4 Draft NDF Policy 7 - Ultra Low Emission Vehicles has been incorporated within proposed new policies on National Connectivity and Regional Connectivity. For further details on these new policies, see paragraph 4.8.10.
- 4.5.5 The consultation responses raised a number of issues relating to zero and ultra-low emission vehicles, which have been used to inform the new transport policies. These include providing greater clarity about different types of zero and ultra-low emission vehicles. It also clarifies that the NDF is placing greater emphasis on battery electric vehicles as they currently offer the most immediate route to the transition away from petrol and diesel vehicles.
- 4.5.6 There was some concern that electric vehicles are not appropriate for rural areas, but this is not considered to be the case and it is our priority to support their uptake in these areas. This is important to the decarbonisation of transport, with rural areas often having no public transport or increasingly finding it hard to sustain services. It is in rural areas where the Welsh

Government and public sector will need to intervene if the market does not provide the necessary infrastructure.

- 4.5.7 Some respondents were concerned about the ability of the grid to accommodate the increased demand as a result of an uptake of electric vehicles. The NDF has been updated to reflect that the Welsh Government is working with energy network operators in Wales to develop the electricity grid infrastructure to support increased use of electric cars and the electrification of the rail network. Whilst grid improvements will surely be needed, much will depend on the way electric vehicles are used. For example, cars could be charged during the daytime using solar energy and, having driven home, use the remaining charge to power homes during the evening peak, recharging overnight when demand generally falls. The costs for charging infrastructure would be offset by the reduction in need for additional capacity to support the now reduced peak demands.
- 4.5.8 Some consultation responses suggested that the policy needs to be underpinned by an energy plan for the regions. Whilst not set out in the NDF, the Welsh Government will work with local authorities to use the evidence from the research and pilots under way in Wales, along with energy planning, to consider future demand for power, heat and transport, to establish where new infrastructure is necessary and include it within their Development Plans. Once supported by evidence, we will encourage network operators to include its delivery within their delivery plans.

## 4.6 GREEN INFRASTRUCTURE, RENEWABLE ENERGY AND DISTRICT HEAT NETWORKS

### *Full response form Questions 6 and 7, and easy-read Question 4*

- 4.6.1 Question 6 and 7 of the questionnaire cover seven draft NDF policies in all. Each question is set out separately below, together with the policies to which they relate. Question 6 relates to Policies 8 and 9, whilst question 7 relates to Policies 10 to 15. Question 7 is further split in to 7a covering policies on renewable energy, and 7b covering policies on district heat networks.
- 4.6.2 These policies have been grouped together in this section because the analysis of the responses to these questions has provided a single main themes table and commentary for all consultee comments covering Policies 8 to 15.
- 4.6.3 Question 6, in addition to receiving responses via the main questionnaire, also includes responses via an easy-read questionnaire, table of statistics and commentary.

#### **Question 6**

##### **Policy 8 – Strategic Framework for Biodiversity Enhancement and Ecosystem Resilience, Policy 9 – National Forest**

Q6 To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

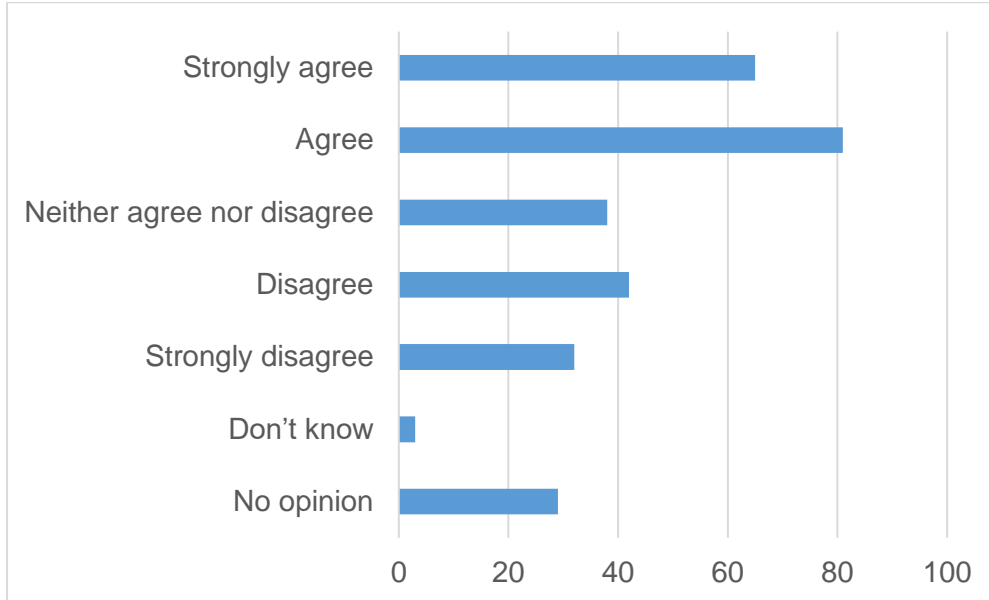
If you disagree with the NDF's approaches to green infrastructure, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

If you disagree with the NDF's approaches to 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?

## Question 6 - Statistics

4.6.4 Based on the question above, Chart Q6 provides a visual representation of numbers of respondents agreeing or disagreeing with the question. The associated tables show the exact number and percentage of respondents expressing a view.

### Q6



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion	Total
Number	65	81	38	42	32	3	29	290
Percentage	22	28	13	14	11	1	10	100

## Question 7

- **Policy 10 - Wind and Solar Energy in Priority Areas,**
- **Policy 11 - Wind and Solar Energy Outside Priority Areas,**
- **Policy 12 - Wind and Solar Energy in National Parks and Areas of Outstanding Natural Beauty, and**
- **Policy 13 - Other Renewable Energy Developments**

To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using,

### Q7.1 Large scale wind and solar developments

- **Policy 14 – Priority Areas for District Heat Networks**
- **Policy 15 – Masterplanning for District Heat Networks**

To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using,

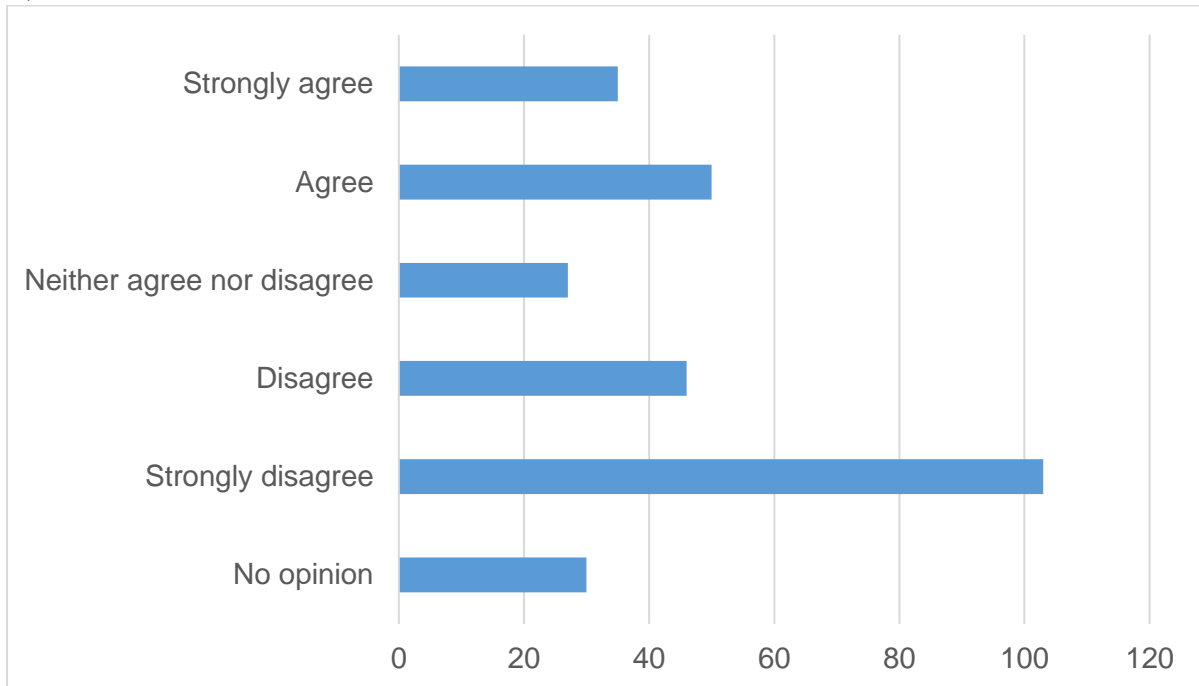
### Q7.2 District heat networks.

In relation to Questions 6 and 7,  
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?

### Question 7.1 – Statistics

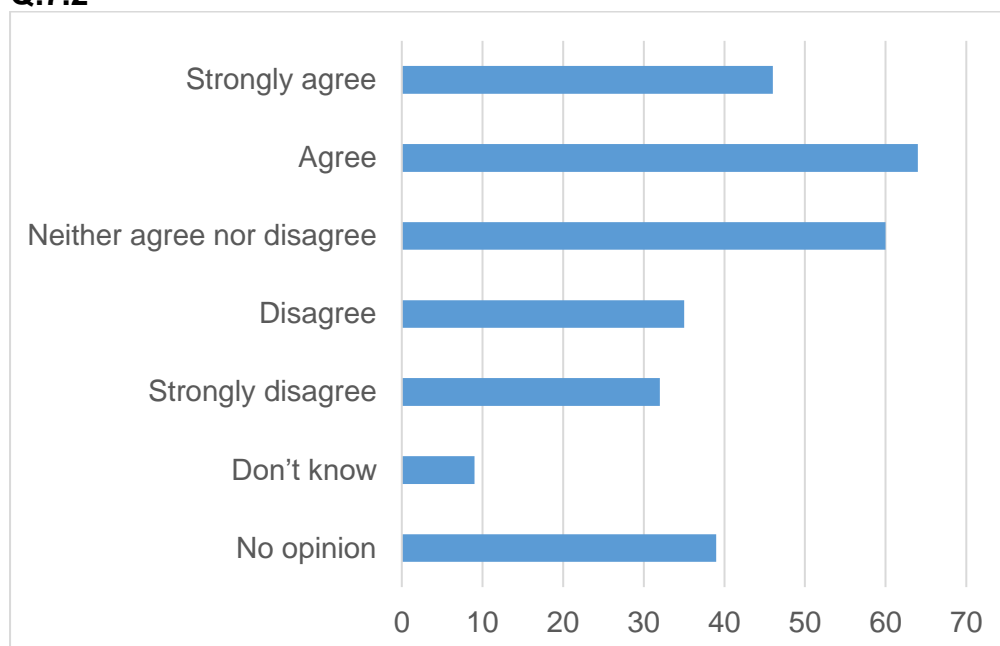
4.6.5 Based on questions 7.1 and 7.2 above, Charts Q7.1 and Q7.2 provide a visual representation of numbers of respondents agreeing or disagreeing with the questions. The associated tables show the exact number and percentage of respondents expressing a view.

#### Q7.1



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	No opinion	Total
Number	35	50	27	46	103	30	291
Percentage	12	17	9	16	35	10	100

### Q.7.2



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion	Total
Number	46	64	60	35	32	9	39	285
Percentage	16	22	21	12	11	3	14	100

### Question 6 and 7 - Main Themes

4.6.6 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment. It covers questions 6 and 7.

Theme	Code	Count
<b>Alternative energy provision</b>	Government should consider offshore wind farms or tidal power/biomass/nuclear power	<b>159</b>
<b>General opposition</b>	Generally oppose renewable energy proposals/large scale developments/proposals are unnecessary	<b>89</b>
<b>Wind/solar developments</b>	Ecological impacts/environmental damage	<b>87</b>
<b>Energy transportation</b>	Concern about how to connect rural wind/solar farms to the national grid/infrastructure necessary to transport the energy	<b>81</b>
<b>Local democracy/decision making</b>	Plans oppose local decision making/don't want decisions being taken by Welsh Government/want local consultation and decision making/ability to object to new wind developments/to object on grounds of impact to landscape	<b>78</b>

<b>Wind/solar developments</b>	Renewable energy proposals won't produce enough electricity/ will be unreliable/ not value for money/ short lifespan	<b>64</b>
<b>Tourism</b>	Wind farms will affect tourism industry/the economy/ concerns about protecting areas of natural beauty for visitors	<b>63</b>
<b>General support</b>	Generally agree with green infrastructure/renewables/ district heat networks	<b>52</b>
<b>Wind/solar developments</b>	Invest in local and self-generated energy/Install solar on buildings/invest in off-grid/battery-based electricity	<b>50</b>
<b>Wind/solar developments</b>	Solar preferred to wind power/more reliable/should be invested in within urban areas	<b>43</b>
<b>Alternative proposal</b>	E.g. bring back grants for solar power installation on buildings/local energy production/insulation/carbon sequestering	<b>40</b>
<b>Wind/solar developments</b>	Concerned about visual impact/an eyesore/turbines will be too large/infrastructure too intrusive/tourism will be discouraged affecting the local economy/introduce buffer zones to reduce visual impact	<b>37</b>
<b>District Heat Networks</b>	Generally oppose/not commercially viable/ won't be net-zero carbon/ short term use/ public scepticism	<b>30</b>
<b>Plans lack detail</b>	General (non-specific)/needs to be more action orientated/measurable	<b>20</b>
<b>Wind/solar developments</b>	Area too large/reduce the scale of wind farm plans/priority area designations need changing/ ensure buffer zones	<b>19</b>
<b>Wind/solar developments</b>	Impact to health/wellbeing	<b>16</b>
<b>Environment</b>	Concerns about levels of consumption/ energy usage / attitude/behaviour towards the environment	<b>15</b>
<b>Climate change</b>	Climate crisis should take precedent over other concerns	<b>13</b>
<b>Priority areas</b>	Definitions unclear/vague specifics need clarification/ reasons for inclusion need stating	<b>13</b>
<b>Priority areas</b>	Need to use a criteria-based approach/ case-by-case/ careful selection	<b>12</b>
<b>Plans/outcomes/ policies</b>	Contain contradictions/outcomes contradict each other /conflict with LDPs/SDPs	<b>11</b>
<b>District Heat Networks</b>	Generally agree with their use/should be extended	<b>10</b>
<b>Reforestation</b>	Details of National Forest (e.g. where/when/how) are needed	<b>10</b>
<b>Housing</b>	Concern about house building and protecting green infrastructure	<b>9</b>
<b>Plans lack detail</b>	Maps inadequate for decision making/need more detailed maps/need population map/contains errors or inaccuracies/misleading	<b>9</b>
<b>Plans lack detail</b>	Terminology requires clear definitions and criteria	<b>9</b>
<b>Biodiversity</b>	Plans need more weight/importance/ should be expanded upon/ aim for net gain	<b>8</b>
<b>Plans/outcomes/ policies</b>	Needs aligning with other documents	<b>7</b>
<b>Priority areas</b>	Area for consideration needs to be expanded (e.g. landfills, National Parks, AONBs)	<b>7</b>



<b>Plans lack detail</b>	Priority area maps not based on evidence	<b>6</b>
<b>Housing</b>	Concerned about the environmental damage of housebuilding/new houses should be eco-friendly/carbon neutral/energy efficient	<b>6</b>
<b>Wind/solar developments</b>	Local communities may want/need compensation for development/ should benefit from development	<b>6</b>
<b>Reforestation</b>	Expand plans/ larger scale/ encourage more	<b>6</b>
<b>Green infrastructure</b>	Needs more emphasis/higher priority	<b>6</b>
<b>Local democracy/ decision making</b>	Request greater engagement with local authorities/ representative bodies /local authorities should decide wind farm placements	<b>5</b>
<b>Reforestation</b>	Reforestation preferred over afforestation/ careful selection of trees/ case-by-case reforestation	<b>5</b>
<b>Biodiversity</b>	Should prioritise people first (e.g. housebuilding)	<b>5</b>
<b>Green infrastructure</b>	Plans need more detail/clarification/maps	<b>5</b>
<b>Priority areas</b>	Designations will cause difficulty for developments	<b>5</b>
<b>Housing</b>	Wind farms will affect house prices	<b>4</b>
<b>Future</b>	Priority areas/renewable technologies should be reviewed periodically/ new technology taken into consideration	<b>4</b>
<b>Developments</b>	"Presumption in favour" should be expanded e.g. all not in Policy 12 (AONBs, National Parks)	<b>4</b>
<b>Reforestation</b>	Plans need more detail	<b>3</b>
<b>Biodiversity</b>	Need more detail in plan (location, specifics)	<b>3</b>
<b>Non-specific</b>	Unsure if the plans are feasible/won't happen in reality	<b>3</b>
<b>Local ownership</b>	May be difficult to achieve/replicate	<b>3</b>
<b>Traffic light</b>	Traffic light system (Policy 11) is unhelpful/should be removed	<b>3</b>
<b>Concerns about RE development</b>	Plans may increase flood risk	<b>2</b>
<b>Energy</b>	Policy should discuss non-renewable energy plans as well	<b>2</b>
<b>Adverse impact</b>	Higher priority/importance should be placed on avoiding adverse impacts	<b>2</b>
<b>Transport</b>	Concerns about Cardiff Airport (e.g. close or reduce funding)	<b>2</b>
<b>Other (unspecified)</b>		<b>34</b>

### Question 6 and 7 - Commentary

4.6.7 The following section is a more detailed commentary on concerns expressed by respondents. It also includes selected quotes from respondents, presented in *italic*, reinforcing those views. It covers questions 6 and 7.

In terms of offering suggestions for alternative approaches to help Wales to enhance its biodiversity and transition to a low carbon economy, the most common suggestions were for alternative means of energy provision. Most commonly, respondents suggested offshore wind farms or tidal energy, which were perceived as having less visual impact and associated implications for the tourism industry when compared to onshore wind farms. Other arguments in favour of this energy source were claims that offshore wind farms now have greater efficiency and lower construction costs than has historically been the case, while

others expressed surprise that Wales' tidal lagoons did not have greater emphasis in the plans.

*The cost of offshore windfarms is falling rapidly, and their rapid development could easily displace the need for further onshore windfarms. Offshore windfarms cause less damaging landscape change and need much less power line infrastructure on land.*

*It's now accepted that offshore wind is far preferable to onshore in a great number of ways, including (but not limited to) the impact of them on the natural landscapes which make our island so precious.*

*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.*

*One example, is the lack of reference to off shore wind and tidal energy generation. Whilst this may be addressed through the Wales National Marine Plan there should nonetheless be clear reference and links in the NDF. The NDF will form the development plan for DNS applications and therefore must provide clarity for making these decisions.*

*The plan to develop tidal energy in Swansea Bay should be resurrected. We further need to investigate hydro-electric and off-shore wind schemes.*

Others suggested that nuclear power was the most quickly attainable and reliable decarbonised energy option, with some suggesting the use of nuclear energy in conjunction with smaller scale wind and solar farms.

*The NDF has an obsessive belief in wind turbine energy. It completely fails to consider the benefits of other renewables including tidal energy, domestic solar and heat exchange systems. It also fails to consider the benefits of new technology nuclear power. This is at a time when the UK government is investing £58 million of public money in small modular reactors (SMR) and advanced modular reactors (AMR).*

*Interesting research has been carried out on Nuclear fusion which will enable in small scale nuclear plants that are completely carbon free to be built in actual cities.*

*The NDF ignores any expansion of generation using offshore wind or small modular nuclear reactors. These technologies enjoy support from the UK government, which is not the case for onshore wind and solar generation. a. If an extension of the Gwynt y Môr offshore wind farm goes ahead this could add up to 1.9 TWh to Wales' annual renewable generation, 16 % of the renewable target of Policy 10 b. If Wales successfully completes a small modular reactor of 300 MW, perhaps at Trawsfynydd, operating at load factor of 85 %, this would deliver 2.24 TWh per annum, 19 % of the 2030 Policy 10 renewable generation target, and would match the production from 1 GW of onshore wind or 2.3 GW of solar.*

Less frequent suggestions included biomass and geothermal energy, although others made negative remarks about biomass' potential.

*Emphasis should be made on biomass (using wood, wood waste, town waste, landfill gasses), hydropower (we have a huge coastline we should be using to generate electricity), and geothermal should also be more actively explored, the single site in Llynfi Valley is woefully inadequate.*

The environmental or ecological impacts of wind turbines were also a common feature of the responses. Respondents argued that the environmental impact of construction, including the quantity of concrete involved in their construction, made wind turbine construction environmentally damaging. Linked to environmental considerations was a less frequently mentioned concern about an increased risk of flooding.

*Turbine blades cannot be recycled...and they are massive!*

*You will permanently destroy large areas of important upland habitat, unavoidably and permanently increasing flood risk by installation of huge areas of concrete, and for the life of the turbines the hill landscape in our area will be utterly obliterated.*

Some additionally suggested that large-scale wind turbine construction could destroy areas of peatland which have an important role in carbon sequestering.

*The document illustrates the immense land areas designated for energy generation in disproportionate detail compared with, for instance, the areas for the proposed National Forest. However, the possible ecological consequences of such a major change of land use are not stated. The effects of development on peatlands (a valuable sink for CO<sub>2</sub>), biodiversity, groundwater and soil are all disregarded.*

Others were concerned with the ecological effects of wildlife habitat destruction, or the risk to birds and bats from the turbine blades.

*In terms of the identification of the Solar and Wind Priority Area in Carmarthenshire which extends into East Pembrokeshire, we are concerned regarding the HRA undertaken that this does not adequately consider the impact of this Priority Area on Barbastelle bats and the important connectivity routes that extend into the area identified in Pembrokeshire. We consider this Area to be too extensive in nature and suggest that it should be retracted further into Carmarthenshire.*

*Although these areas are not officially classed as national parks they are none the less areas of outstanding natural beauty and are home to a wide range of wildlife including various species of birds and bats.*

*The habitat LANDMAP needs revision in the light of NRW's published spatial survey of the protected species of great crested newts on Anglesey.*

Still relating to the renewable energy proposals, respondents frequently questioned how wind and solar farms would be connected to the national grid, or felt that the additional infrastructure and associated visual impact involved in grid connection hadn't been adequately considered, particularly in rural mid-Wales.

*The designated areas have no connections to the national grid. Any such new grid connections would further desecrate the Mid Wales landscape.*

*We are surprised by the lack of consideration for Grid Connection and how that will impact the landscape and the various industries in Powys. We feel that the planning policy guidance for decision makers should regard the landscape impact of grid*

*connection as a material consideration. Applications which allow development to connect to existing DNO grid connections (and therefore would be more sympathetic to the landscape) should be given more favourable weight than applications which will require large scale pylons.*

*We have carried out an analysis of the economically developable resource within the Priority areas by considering the usual constraints and our analysis indicates that the Priority areas will only yield up to ten potential large scale windfarms with a total capacity of less than 350MW. Our analysis does not take account of the availability of a viable grid connection, which will inevitably further reduce the economically developable capacity.*

*The areas identified for large scale wind development in North West Wales appears to clash with the potential route of the National Grid's second grid line across Anglesey There is no mention as how the electricity would be moved from the areas where it is produced.*

Similar to Q1, 78 respondents felt that decisions on renewable energy development should be taken locally, rather than being influenced by an 'acceptance of landscape change' from Welsh Government.

*The NDF needs to be fair, and viewed as fair by the people who live in Wales so planning process should allow (and consider) comments in all areas including landscape change.*

*Unacceptable that objections about impact on landscape are not "accepted" despite widespread acknowledgement that this is one of the main objections to massive scale RE sites.*

*Powys County Council had put a lot of work into their LDP...which has only recently been passed. However, the WG. have chosen to ignore what plans they (and other Councils) have already put into place for potential Solar Energy; Wind Energy; or indeed, District Heating Networks. They have been completely overridden, by the WG 'proposed' NDF.*

An additional concern regarding the proposed wind and solar developments was their perceived unreliability. Wind farms in particular were described negatively in terms of reliability and efficiency because of their inability to produce electricity when windspeeds aren't sufficiently high. Others suggested that wind turbines have a short lifespan and create pollution at the point of dismantling. Consequently, there were suggestions that wind farms aren't capable of producing value for money.

*Wind power is unreliable and will be generated in areas away from urban populations so will have high transmission costs.*

*Wind power stations are only efficient and carbon neutral when the blades go round. Not during development or demolition.*

*Advances in technology over the planning period will make these installations obsolete and more effort should go into non-obtrusive solutions.*

The tourism industry was of key concern among many when it came to wind farm location. Areas such as Powys and Anglesey were seen as reliant on the tourism industry, which in turn was seen to be reliant on the unspoilt nature of Wales' rural landscapes.

*I work in the tourist sector in Priority Area 7 and I know from many years of experience and a similar situation that I moved away from in northern Powys that certain areas of the tourist sector will be directly affected by these plans. Priority Area 7 is a particularly small area of land adjacent to one of our National Parks which includes a large amount of National Trust common land used by our tourist sector. I'm struggling to understand who concluded that Priority Area 7 would be a good place to site industrial wind and solar farms. I live and work here and I know what visitors love most about this area. Check all the websites of all the local tourist businesses and AirBNBs... you'll find the word "unspoilt" in almost every one. Unfortunately, large scale wind and to a lesser degree solar are a turn off to people searching for "unspoilt". The truth is that a huge amount of entrepreneurs in Priority Area 7 have created their businesses around this concept of "unspoilt". Large scale wind and solar developments will have a negative impact on these businesses.*

*The rural economy and tourism industry supports thousands of jobs which depend upon the Mid Wales landscape.*

*Farmers have been encouraged to diversity into tourism and the Welsh government now seem determined to waste the opportunity that they have created.*

*Anglesey is a small island off the North Wales coast of approximately 32 miles in diameter. It is a rural area comprising many small communities throughout its interior. Its economy has two main contributors, tourism and farming. Tourism is the biggest earner bringing in over £300 million per annum. The appeal of the island to tourists is its natural unspoilt beauty. Whilst 95% of its coastal areas are designated as areas of outstanding natural beauty (AONB) its interior shares that natural beauty loved by visitors. The tourist industry thrives throughout the island.*

*The GIS computer generated priority areas which take into account a number of variables in locating suitable renewable development, do not look at industry which could be impacted by the development of wind or solar farms. For example, tourism business and tourism related assets (e.g. national trails). This needs to be given consideration to and factored into planning guidance for decision makers. Further, inter Policy 3, it is stated that it is important that the planning system responds to the challenges faced by the rural economy, "facilitating appropriate new development and diversification". Many agricultural businesses have diversified into tourism and this trend is likely to continue. This needs to be given due consideration and consideration given to how energy development will impact the sustainability of such rural areas.*

52 respondents gave comments which showed general support for green infrastructure/renewables/district heat networks, although some asked for clarifications or raised considerations in spite of their support for the proposals in principle.

*I know there's a campaign to stop wind farms on Anglesey, and just want to add that I am very supportive of new wind farms on Anglesey. I live in Conwy and regularly holiday on Anglesey which I will continue to do. I like the look of them and even if I didn't, they're better than a climate catastrophe.*

*In general agreement with solar / on-shore wind proposals but seeking clarification that tip-height restriction of 125M applies in Wales as it does in the rest of the UK.*

*In summary, we agree with the objectives of NDF Policies 10 – 14 but consider that the support provided to energy generating development needs to be strengthened and recognise the mix of technologies required to deliver a flexible, resilient, low carbon energy system. The NDF simply must include a presumption in favour of renewable and low carbon energy development in all areas except those identified under Policy 12.*

An alternative to large scale wind and solar developments includes investment in local or community wind or solar developments, or installing solar panels on existing buildings, especially in urban centres.

*Windfarms should be constructed close to the large urban areas that require more electricity, thus negating the need for large pylons, sub-stations and grid connections right across the rural countryside.*

*Approach should be focusing on what we can provide ourselves and stop wastage by improving our planning for homes/businesses, promote & assist with roof Solar self-created energy*

*Alternative: to encourage/promote/actively support people making their own energy for their own needs. World moving towards being self-sufficient and responsible for own use/needs and the rejection of over-use or waste.*

*If we want to be power sufficient, then we need to produce what we need, where we need it, in terms of generating for ourselves with individual projects such as the home solar panels*

While the scale of the proposed wind and solar developments both received negative comments, many suggested that they preferred solar development to wind power and approved of a further roll out in urban areas.

*For almost all ground-mount solar installations, panels are set on posts and there is minimal disturbance to the ground (typically less than 5%). The remainder of a field utilised for solar park development is still accessible for plant growth and potentially for wildlife enhancements and complementary agricultural activities such as conservation grazing of sheep. Solar parks are secure and long-term installations (with 25-40-year operational lifespans), requiring minimal human disturbance of the grounds, and with a very small infrastructure footprint – all attributes that engender them as good areas to enhance the ecological value of the landscape. Indeed, a number of our members have reported that threatened and endangered species regularly make use of their large-scale solar sites as habitat.*

As well as suggestions for alternative renewable energy schemes, other alternatives were suggested, such as bringing back grants for individuals to install solar panels on private residencies and business premises, carbon sequestering, and encouraging better home insulation, among others.

*Wind/solar/hydro electric generation at small scale farms, feeding directly into the local community. While green energy is necessary, large scale farms are not necessarily the way forward. Small scale farms also reduce the need for large amounts of pylons to export the electricity around the country. It has been shown to be viable in*

*other countries, perhaps Wales could spearhead this in the UK, as we have the natural resources in abundance.*

*Up-front grants for ground and air source energy generation to enable all homes to have them, solar panels on all industrial buildings roofs and reintroduce incentives for private individuals to install solar panels, better insulation of homes*

*The Framework makes no mention anywhere of carbon sequestration through the growing of energy crops and their bio-digestion into methane, animal feeds, and fertilisers! Since this is a glaring omission, I presume there to be some reason for it. Might the final version of the framework explain this omission please?*

*Opportunities exist to explore ways that farm waste can be re-used to generate energy through existing farm practices. Such schemes will be essential to aide the sustainability of rural areas.*

Other common themes included the proposed priority areas, with some respondents wanting more information or rationale behind the creation of these zones or how the boundaries were drawn. These comments occasionally criticized the maps included in the NDF as not sufficiently clear for decision-making or for omitting key information. Others wanted selection of priority areas to be done on a case-by-case basis, rather than blanket areas covering parts of Wales.

*It is unclear what status safeguarded priority areas have in the existing framework of ecological designations? There is already a comprehensive framework of national legislation and policy which protects biodiversity. How will these safeguarded areas be considered in GI assessments and ecological appraisals?*

*It is also unclear from the NDF and the Arup study whether further refinement of Priority Areas are required before inclusion in the LDP, and/or whether additional Local Search areas would be required to be shown in an LDP.*

*Wording of the policies should be clear and consistent to establish the meaning of "identified protected assets" (they may be protected at different levels in the planning hierarchy or be statutory/non-statutory designations).*

*If the evidence base were robust, the Council would expect the maps to more widely identify areas of wind only, solar only as well as wind and solar priority areas.*

*The maps need to be presented in terms of red/amber/green for each technology – it will also be necessary to indicate areas where there is no potential due to lack of resource. Maps presented at 1:250,000 scale due to high level study at a national level and not designed to present site-level accuracy. However more detailed maps will be required to refer to at the planning application stage in order to identify whether a site lies within or outside of the Priority Area, which will be fundamental to decision-making. How will decision makers and potential developers know whether a development proposal is inside or outside a priority area?*

*Similar to our earlier comments on the map at page 25, the map at page 42 also appears unclear, with 'priority areas' appearing extremely vast, which could give the impression that the whole area is suitable for onshore wind and/or solar.*

Comments relating to district heat networks (DHNs) were less common than those which focussed on wind and solar developments. 10 respondents made comments which were specifically supportive of DHNs, suggesting their use or presence in the NDF be expanded.

*District heat networks are clever, incinerators burn up rubbish and create heat. No smell, no carbon. Gothenburg on the west coast of Sweden has had these for decades.*

*Whilst the encouragement for district heating networks proposals is welcomed and there is recognition that in principle, they are supported wherever they are viable it is disappointing to see that Ebbw Vale is not referenced given previous and existing work being undertaken to develop District Heat Networks.*

*[W]hilst the Council supports the identification of Neath as a priority area for such networks, it is suggested that Port Talbot should also be identified. Local knowledge, experience and existing land uses would suggest that Port Talbot has significant potential for such networks. The Authority has already undertaken a feasibility study into district heating solutions as a consequence and this proved positive. The Authority is therefore in the process of pursuing a project entitled 'Smart Low Carbon Port Talbot' which is in conjunction with a private partner.*

Nevertheless, objections were raised with the feasibility of DHNs, in particular around their upfront costs and achieving critical mass, as well as environmental considerations.

*In practice, a District Heat Network (DHN) is unlikely to be considered feasible in the majority of proposals. The process of dismissing the feasibility of such schemes would place an undue burden on applicants. In any case, as set out in the Vale of Glamorgan Council's response to the Draft NDF – "a significant hurdle to financial viability in delivering DHN schemes for domestic use is consumer uptake. Energy Services Providers are likely to have a minimum dwelling uptake to be able to consider taking on a DHN scheme, which in some cases will require as many as 500 dwellings to consider a CHP scheme economically viable".*

*Our Re-energising Wales research did not explicitly consider the deployment of district heating networks (DHNs). However, we note that whilst they do provide an energy efficiency gain over many forms of individual home heating units, they are often fuelled by fossil fuel natural gas. The transition to non-fossil fuel gas would need to be an explicit element of DHN deployment.*

*Llanmoor's experience with DHN is that they are frequently unviable, dependent on third party delivery, while consumers often do not trust the technology. A significant barrier to the development of DHNs is the capital cost of infrastructure. Implementing DHNs involves substantial upfront capital costs before income is generated from developments. The potential to absorb the cost of DHN will vary across the country but is likely to be prohibitive for all but the largest development in areas of high market demand. In areas where viability is marginal, requirements to deliver DHN will render developments undeliverable.*



### Easy-read Question 4

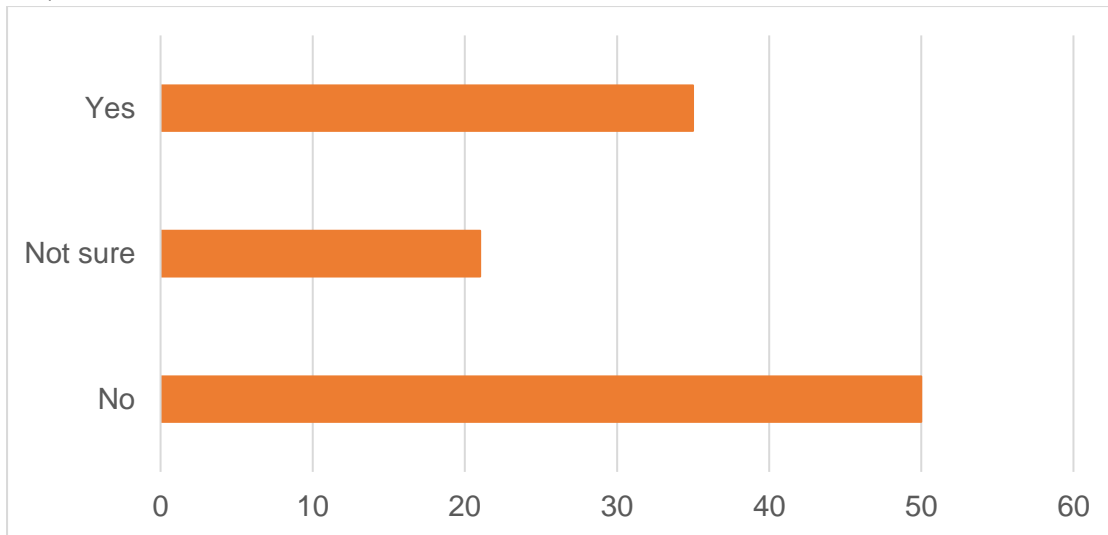
This question corresponds with question 6 of the full questionnaire, covering policies 8 and 9.

Q.4 Do you think the plan will help us take care of our environment?

### Easy-read Question 4 – Statistics

4.6.8 Chart EQ.4 show the number and extent to which respondents agree or disagree with questions Q.4. The associated tables show the exact number and percentage of respondents expressing a view.

#### EQ4



	Yes	Not Sure	No	Total
Number	35	21	50	106
Percentage	33	20	47	100

### Easy-read Question 4 – Main Themes

4.6.9 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment. It covers easy-read question 4.

Theme	Code	Count
<b>General opposition</b>	Generally disagree with proposals	<b>34</b>
<b>Wind/solar developments</b>	Damage to the countryside/ecological impacts e.g. danger to wildlife/environmental damage/should not be an 'acceptance of change' to landscape	<b>29</b>
<b>Alternative energy provision</b>	Government should consider offshore wind farms or tidal power/biomass/nuclear power	<b>11</b>

<b>Tourism</b>	Wind farms will affect tourism industry/concerns about protecting areas of natural beauty	<b>11</b>
<b>Local democracy/ decision making</b>	Plans oppose local decision making/want local consultation and decision making/ability to object to new wind developments/to object on grounds of impact to landscape	<b>9</b>
<b>Wind/solar developments</b>	Concerned about visual impact/ turbines will be too large/infrastructure too intrusive	<b>8</b>
<b>Rural areas</b>	Not enough detail or emphasis given to rural communities in plans/how will rural communities be supported for growth/not enough mention of agriculture industry/too much emphasis on urban areas	<b>6</b>
<b>Wind/solar developments</b>	Impact to health/wellbeing	<b>5</b>
<b>General support</b>	Generally agree with proposals/think plan will help take care of environment	<b>4</b>
<b>Further detail/consultation required</b>	NDF doesn't contain enough detail/maps not sufficiently evidenced for decision making/key stakeholders and residents haven't been informed of these proposed changes	<b>4</b>
<b>Wind/solar developments</b>	Wind/solar won't produce enough electricity to match demand/aren't reliable	<b>4</b>
<b>Energy transportation</b>	Concern about how to connect rural wind/solar farms to the national grid/infrastructure necessary to transport the energy	<b>3</b>
<b>General</b>	Generally oppose renewable energy proposals/large scale developments/proposals are unnecessary	<b>2</b>
<b>Wind/solar developments</b>	Solar preferred to wind power/more reliable/should be invested in within urban areas	<b>2</b>
<b>Mid and South West Wales region</b>	Plans disproportionately impact mid-Wales/mid-Wales not being listened to	<b>2</b>
<b>Housing</b>	New developments need adequate community facilities/Consider compulsory purchase on empty homes/use existing housing stock/unused housing before building new housing	<b>2</b>
<b>Reforestation</b>	Need to increase tree coverage	<b>1</b>
<b>Alternative geography/split of regions suggested</b>	Disagree with grouping of rural mid-Wales and Swansea/rural mid-Wales communities should be considered as a separate entity	<b>1</b>
<b>Other (unspecified)</b>		<b>4</b>

#### Easy-read Question 4 - Commentary

##### 4.6.10

Respondents were asked whether the plans would help take care of the environment and tended to make comments which generally opposed the plans.

*As above if you wish to care for your environment don't do it. And certainly don't do it under the umbrella of we are caring for our environment.*

*It will ruin whole communities and the livelihoods of businesses and residents within them. More work needed.*

More specific opposition was repeated on the basis of the negative impact of wind turbine development on the environment or tourism industry, with similar suggestions made about offshore wind, solar, tidal and nuclear power as alternative energy sources. Concerns about the reliability of wind power were also raised in the responses to this question, as were a couple of responses advocating solar over wind developments.

## **Written Submissions**

4.6.11 The following consultation responses were provided as written submissions and did not use either a full questionnaire or easy-read questionnaire.

The Alliance for Welsh Designated Landscapes (in conjunction with the Campaign for National Parks) felt that designated landscapes had not been recognised within the placemaking framework, and that this translated to a lack of detail on how these areas would be safeguarded.

*Designated landscapes account for 25% of Wales' land area with their international status reflecting their long history and acknowledged experience in promoting vibrant working landscapes within a sensitive context. Their legacy of adaptive planning and the positive stewardship of those nationally important natural and cultural heritage qualities which make these areas special, mean they play a specific national environmental, social and economic place making role.*

*It is clear from [their] endorsement of designated landscapes, that the Welsh Government view these areas, both individually and collectively, physically and spatially as special places where specific and very distinctive place making characteristics exist and which have a specific role to play in the future wellbeing of Wales.*

*[...] Given their recognised national spatial role, we anticipated the specific and different circumstances associated with the nation's most valued landscapes would be explicitly recognised in the strategic "Placemaking" framework proposed in this emerging NDF.*

*To the contrary and disappointingly, the NDF pays scant regard to the specific manner by which the integrity and resilience of these essential components of the nation's environmental infrastructure will be realistically safeguarded.*

**Alliance for Welsh Designated Landscapes  
in conjunction with the Campaign for National Parks**

## **Wind and solar developments**

As has featured substantially throughout the responses to the consultation, wind and solar developments raised concerns about impacts to rural areas, countryside and areas of natural beauty. Notably, there were also detailed objections on the basis of the evidence base used for the creation of priority areas.

*the creation of the SSA boundaries were subjected to a public consultation process and tested in relation to landscape sensitivity based on the LANDMAP for Wales. By contrast the ARUP studies used for the defining the PAs have downgraded all but the most sensitive areas (fixed constraints) as unsuitable for wind and solar development. The NDF does not take account of the Powys LDP RE policy, which is evidence based, extensively consulted, and properly tested for 'soundness'.*

**Meifod Community Council**

*We note that the geographical areas of National Parks and AONBs are rightly recognised as "fixed determinants", providing no scope for the deployment of major wind or solar energy installations within them. However we do not agree with ARUP's conclusions<sup>4</sup> at Page 24 Para 3.2.2 that:*

- *Landscapes of High or Outstanding value (as recognised by LANDMAP)*
- *Historic landscapes ( as recognised by LANDMAP)*
- *Areas of peat deeper than 45 cms*

*... should individually or collectively be classified as "variable determinants" rather than fixed determinates when assessing those areas adjacent to designated landscapes which may or may not be suitable as Priority Areas.*

*We find this approach completely inconsistent with all accepted current planning practices where the significance of any aspects of LANDMAP data classed as Outstanding or High, are recognised as important material planning considerations, which objectively define not only an area's landscape character but also its quality and sensitivity.*

*[...]*

*We likewise believe the legitimacy of the ARUP's conclusions are further compromised by virtue of the "Stage 2: Refinement of Priority Areas for wind and solar energy" document<sup>5</sup> clearly stating at Page 16, Para 3.1.3. There is no Wales-wide sensitivity assessment for wind energy or solar development.*

*Despite noting that 12 out of the 22 Local Authorities in Wales have undertaken such studies, this information has been disregarded. Equally where the data does exist, no attempt has been made to account for these Local Authority findings to confirm or otherwise the legitimacy of the boundaries of those Priority Areas within what ARUP define as the "visual setting area" of designated landscapes.*

**Alliance for Welsh Designated Landscapes  
in conjunction with the Campaign for National Parks**

*Definition of PAs is based on a deeply flawed Arup report that conflicts with their own earlier assessment for TAN8 Strategic Search Areas and is completely at variance with the Aecom report produced as the evidence base for the Renewable strategy in the Powys LDP*

**Montgomery Town Council**

Conversely, EDF energy stated that the Priority Areas were too restrictive once developer constraints such as property buffers and wind speeds were taken into account, and that other

areas outside of both Priority areas and AONBs were further away from residential properties and more appropriate. Because areas outside the Priority Areas would have more restrictions and consenting risks, EDF suggested a criteria-based approach instead of using Priority Areas.

*Overall, the additional consenting risk outside Priority Areas may have a negative impact on future inward investment in onshore wind development in Wales and support for the established Welsh supply chain will be reduced or lost entirely.*

*Our preference would be for Priority Areas to be replaced by a criteria-based approach which incorporates the supportive wording in Policy 10, avoids subjective constraints (such as landscape and visual impact), and avoids overly onerous buffers on designated features (heritage, ecology etc.).*

**EDF Energy**

### **Alternative energy provision**

Similar alternative energy sources were suggested in submissions that were raised in the responses to the consultation questionnaire. Respondents recommended utilising the Wales' coastline for tidal and offshore wind power. While most of these didn't clarify where they thought these tidal or offshore wind farms should be located, Conwy County Borough Council suggested the North Wales Coast as proposed in the Conwy Economic Growth Strategy and supported in the Conwy RLDP. There was an additional suggestion of a Severn tidal barrage, or Cardiff, Swansea, Newport or Colwyn bay tidal lagoons, or to the West of the Isle of Anglesey.

*On-shore wind is rapidly being superseded by off-shore technology, generation capacity, carbon footprint and employment opportunities and adverse environmental and community impacts are largely avoided. Wales should be giving its attention to off-shore potential and the development of servicing facilities.*

**North Montgomeryshire Local Councils Forum**

### **AONBs**

The Clwydian Range and Dee Valley AONB Joint Committee, while supporting the protection from development afforded to AONBs, felt this did not go far enough in terms of setting this out explicitly in-line with PPW and protecting areas adjacent to AONBs which are still visible from within AONBs and would therefore be affected by development. The Cambrian Mountains Society suggested the character of the existing landscape was grounds for expanding the number or range of existing AONBs for protection, including from wind farm development, and put forward wider concerns about the commodification of the natural environment into 'natural resources.' Other suggestions for areas which should be protected from wind/solar developments included Radnor Forest.

### **National Forests**

For the most part, the principle of developing a national forest was supported by those making submissions, and there were positive comments about its potential to reverse biodiversity decline and tackle climate change. Some made suggestions that the development needed to be considered alongside the creation of transport links for access, and as an opportunity for developing green industries. However, some felt that the lack of indicative areas in the NDF or evidence base to explain the rationale for its scope was disappointing or

believed that the proposal didn't go far enough. A less supportive comment questioned the current management of forestry by the Government and also felt that the NDF hadn't explained the purpose of the development of a national forest, while another was wary of the potential for increased timber use and its associated carbon footprint.

*The development of a National Forest is welcome but needs to be clearly backed up with a mechanism for delivery and connection to land management payment schemes. [...] There could be big opportunities around SE Wales Valleys, Brecon Beacons and Snowdonia NP's, but cultural conflict with open hill and common land and traditional use for stock rearing. We think the aspiration is low and we need to increase tree cover to a minimum of 25-30 %.*

One response, while being supportive of the concept of a national forest, suggested the national forest should only contain native trees, and highlighted the potential impact to both agricultural workers and Welsh speakers which should be considered.

*Framework should note the need to consider the impact on agriculture and the Welsh language when developing more forests, highlighting that 40% of our agricultural workers speak Welsh, the highest percentage in any field work in the country. It would turn land from being land that supports agricultural employment to be forest land has a negative impact on the Welsh language as a living community language.*

## **Biodiversity**

Among the submissions, there was generally a recognition of the importance of resilient ecosystems and reversing declines in biodiversity, with statements of support for the NDF's emphasis on biodiversity enhancement for sustainable urban growth. Wildlife Trusts Wales highlighted that the NRW (Natural Resources Wales) State of Natural Resources Report (SoNaRR) states that no ecosystem in Wales is resilient, and described the interconnectedness of biodiversity with other policies and areas of the NDF. They gave examples of an increase in carbon emissions and inappropriate developments as potential harms to biodiversity, citing Cardiff Airport Link Road, Deeside Relief Road or M4 Relief roads as potential contributors to this.

While the approach was supported in principle, there were multiple reservations about the approach of using Area Statements, due to them being "untested" or "yet to be put in place":

*We note above the emphasis that the policy places on the Area Statements process along with Green Infrastructure Planning. We note and support the need for strategic green infrastructure mapping. The supporting text to the policy refers to strategic green infrastructure mapping and NRW mapping of national biodiversity themes. No reference is provided to this work – it would be helpful if this was included. There is a risk that this mechanism may be mainly focused on urban growth areas. We support the statement that priority areas for action identified in Area Statements should be a material consideration in the planning system. We suggest that the identification of priority areas to support this policy is made more explicit in the Area Statements process. It is not clear to us how long it will take for Area Statements to generate the priority areas envisaged by this policy. The Welsh Government and NRW urgently need*

*to confirm whether Area Statements are scoped and on track to identify these priority areas and ensure that contributors to NRW's process can respond appropriately. We would also note that Area Statements are an untested mechanism and that additional mechanisms to identify priority areas might be needed.*

There were also multiple requests to make explicit reference to priority species, and suggestions on wording which would afford protection to them, as well as suggested wording changes to incorporate the concept of 'net biodiversity benefit'

*Areas that are significant for priority species (S 7 Environment Act) need to be part of the criteria for identifying priority areas and for evaluating developments. [...] The emphasis in the policy on habitats is important but does not of itself give sufficient focus to the needs of priority species. The Welsh Ministers must take steps to maintain and enhance priority species that are listed in Section 7 of the Environment (Wales) Act). As an example, curlew is one of our most threatened and iconic birds and could be lost from Wales in the next 20 years – the period covered by the NDF. The national ecological network referred to in the policy must explicitly encompass the needs of priority species such as curlew.*

**Wildlife Trust Wales**

*We therefore recommend that the language and content of the NDF is strengthened to be at least as strong as PPW, and to clearly articulate the requirement to deliver net biodiversity benefit, rather than just 'biodiversity enhancement'.*

**WWF Cymru**

*Require a significant contribution by all developments to reversing the decline of biodiversity through requiring net biodiversity benefit – for example, requiring each Priority Area to have a Statement of Environmental Masterplanning (SEMPs) which will identify nationally significant opportunities local to contribute to the ecological network*

**Wildlife Trust Wales**

## **Powys Energy Submissions**

There were 161 responses from residents, local community groups and community councils across Powys who submitted concerns which focussed primarily or exclusively around wind turbines for renewable energy production being installed in mid-Wales, as laid out in the NDF. Most of these were private individuals.

A small number of responses expressed a disbelief in climate change or took the position that Welsh Government do not have a role in addressing climate change, However, in general there was an acceptance, in principal, of the need for renewable technology as part of a broader decarbonisation strategy. Despite this, most people had concerns about both the NDF and the consultation process. Much of this revolved around plans for wind turbines in rural areas. Other issues were also raised which ranged beyond this and illustrated broader concerns. These concerns are summarised below.

## **The Marginalisation of Rural Wales**

Underlying many of the responses was a concern that through the NDF, rural Wales is being marginalised by Welsh Government. In different ways, the NDF was seen as a document which benefited urban areas at the expense of rural ones. Several respondents said this directly, for example:

*The NDF seems to be written with urban people in mind, and the potential devastating impacts on landscape and on the well-being and livelihoods of rural communities received no attention at all.*

*Don't treat the rural areas of Wales as a hinterland. They are distinctive areas within their own right and the urban centric policy making in the NDF does nothing for rural residents.*

*Perhaps the wording "rural hinterland" was chosen deliberately? Hinterland meaning: an area lying beyond what is visible or known*

People felt that, as a result, rural areas were being negatively impacted by the NDF and disproportionately to urban areas. Across almost all these responses, a sense that local character, knowledge and perspectives within rural Wales were being ignored for the benefit of urban Wales and/or Welsh Government was expressed. One respondent said, *"it seems as though the Welsh Government is determined to do all it can to ignore the views of Mid Wales people"*. This view was echoed directly and implicitly throughout many of the submissions. These were often accompanied by feelings of being *"let-down"* by the NDF. These feelings were expressed across several themes.

### **A Clash of Rural Landscape Values**

*The use of "landscape" in the draft NDF is conceptually limiting and its application to spatial strategies is damaging. I strongly advocate a democratic and collective use of "landscape" that empowers people to make decisions about development at a local level.*

The above respondent articulates a tension which seemed to underly many objections to the NDF from people in Powys. This tension revolves around different and conflicting values that people give to the rural landscape of Powys and beyond. There was a feeling that the NDF conceptualises the rural landscape primarily as a place to install infrastructure for the harvesting of renewable energy.

*Rural areas and residents are given little focus in this NDF other than being viewed as, apparently, empty spaces available for the indulgence of the Welsh Government's obsession with onshore wind generation. This government appears to have no understanding of, or concern for, rural Wales and its residents.*

Perhaps this is not surprising given that most people were objecting to wind turbines in rural Wales. That said, many people contested the *"acceptance of change"* to the landscape suggested by the NDF.

*Strongly object to your assumption of the acceptance of landscape change.*

*The Mid Wales landscapes should be protected and that an acceptance of landscape change as set out in the proposals is entirely unacceptable.*

The most common alternative landscape value focused on the aesthetic qualities of Powys and the wider Welsh countryside. Many said that the proposed landscape change (i.e.



installation of wind and solar infrastructure) was potentially damaging to the local tourist economy which heavily relied on the unbroken natural beauty of the rural landscape. The visual impact of wind and solar energy infrastructure would negatively impact both the landscape and the tourist revenue it generates. Many people also expressed concerns that the NDF did not consider how this rural tourist revenue would be protected.

*The rural economy supports huge number of jobs through tourism and other activities dependant on the scenic mid Wales landscapes*

*In my opinion, much of Radnorshire, although not designated AONB, is in reality an area of outstanding natural beauty and should be protected as such. Placing turbines, prominent and overbearing moving objects, in this area would have an outlandish detrimental effect on the landscape and the lives of those living in the area...Tourism businesses including bed and breakfast establishments, cottages, walking and riding organisations all depend upon unspoilt landscape. Tourism is vital to the economy of mid Wales but it will be ruined in areas where turbines are erected. Footpaths and bridleways would be overwhelmed by the scale and noise of turbines.*

*Please do not cover mid wales with wind turbines which would have a massive impact on tourism in this area in which a lot of people heavily rely on for an income.*

Other respondents were concerned that the NDF placed no value on the ecosystems and wildlife that could be destroyed by wind turbines. Some people mentioned that Wales has a poor record on the protection of its biodiversity and felt that the NDF would make this worse. One respondent stated:

*Neither does policy 8 get a grip on reality; our biodiversity is dying from intensive agricultural pollution. The proposed farm subsidy scheme is no guarantee it will improve pollution such as ammonia, as entry is voluntary and so intensive agriculture could well choose to opt out. Agricultural pollution is an area that it is entirely possible to regulate and use of the planning system could help. I note the October 2019 CPO letter about biodiversity but it does not address this pollution crisis. Besides, here in Powys where intensive poultry units are at the greatest density in Europe and show little sign of abating, planning officers consider a few trees labelled "enhancement" as fulfilling their EAW s6 duties.*

However, where this was mentioned, most people didn't expand on the specifics of this poor historical record, although one person mentioned the impact of upland overgrazing and others referred to the destruction of "sensitive" ecosystems. For others, the building of wind and solar energy infrastructure would destroy parts of the ecosystem that are important for carbon capture, thus undermining the wind and solar strategy of part of a broader decarbonisation programme.

Other landscape values related to a notion summarised by the respondent who said, "the beautiful landscape of Mid Wales has an intrinsic value which cannot be quantified in monetary terms".

One such view of the landscape was in terms of the therapeutic qualities of green space which can positively influence health and wellbeing. The construction of wind turbines was perceived to result in the destruction of green space and therefore negatively impact on health and wellbeing. It was felt that the NDF failed to realise these benefits of green space,

which may be hard to quantify in monetary terms, but would be a great loss to the rural population in areas where the landscape was changed.

The landscape was also seen as a place in which cultural identity lies. Several submissions included photographs and descriptions of the Welsh rural landscape underpinning this. For some, Welsh landscape was part of the Welsh identity. Others placed importance on the fact that these landscapes bear traces of the distant and recent past and that the building of turbines in rural areas would wipe out these traces of the past, destroying the cultural heritage of parts of rural Wales.

*Powys has a very wide and diverse landscape of natural beauty rich in history, archaeology and ancient sites of extreme and outstanding appeal which would be detrimentally impacted upon.*

Several respondents also pointed out that, as well as the unquantifiable cultural impact, this would also impact on the rural business that derives income from these landscape features.

Among those with these different landscape values was a feeling that the “*acceptance of landscape change*” within the NDF was an acceptance of the destruction of these qualities of the Welsh rural landscape which are not of concern to, and therefore in danger of being destroyed by, the NDF. These conflicting values were often couched in terms of the urban-rural tensions highlighted above.

Comparisons with the Marine Plan were made as it was felt that the Marine Plan’s focus on the importance of offshore wind turbines was undermined by the NDF’s proposals for onshore wind energy generation.

*No mention is made of the increasingly viable and effective offshore wind resource and other marine technologies as indicated in the Wales Marine Plan which was finalised on 12th November 2019*

*Our initial astonishment has now turned to outrage as we realise that this misconceived proposal (riddled with errors and muddle) is an inadequate and counter-productive way of responding to Wales’ ‘climate emergency’ when more suitable and effective marine technologies are recommended in the Welsh Government’s Marine Plan.*

### **Issues with the Designation of Various Spatial Areas**

There was some objection to the various spatial areas proposed within the NDF. This set of responses overlaps with suggestions that the evidence behind the NDF has led to the wrong outcomes. Most were objecting to the boundaries of the Priority Areas because lying within these boundaries were designated areas which they felt were unsuitable to host the development of wind and solar power infrastructure. Others felt that such designated areas, while not in a Priority Area, were close enough to a Priority Area to be impacted on (e.g. visually) by any development in the Priority Area. Examples of designated areas that people felt should not be impacted on by wind and solar development in Priority Areas included: Sites of Special Scientific Interest (SSSIs); AONBs; National Parks and National Trust land.

Respondents wanted to see examples of impact assessment of these Priority Areas as well as the criteria for their designation.

*The map showing priority areas for future wind and solar electricity generation have been prepared without applying any of the constraints that will inevitably apply should proposals come forward for potential approval. Powys County Council made this mistake when preparing its draft Local Development Plan (LDP), raising unnecessary public concern and pre-emptive opposition to the proposals. Once the full constraints were applied, the areas identified in the LDP as potentially suitable for future wind and solar electricity generation were a tiny fraction in size in comparison to the areas shown in the draft proposals. The Welsh Government's approach in this part of the NDF is making the same mistake.*

There was one set of responses which objected to the Priority Areas as they felt they excluded specific places which would be suitable for development of wind and solar power infrastructure, but these appear to be a group of people interested in developing a particular site.

There was also objection to the fact that the planning process for wind and solar energy infrastructure would be different for developments outside and inside the Priority Areas.

### **Concerns about renewable technology itself**

There were direct concerns about renewable energy technology and its associated infrastructure.

Both wind turbines and solar farms were seen to have a negative impact on the environment. Some discussed the ways in which the natural environment is destroyed when these, and the infrastructure supporting them, are installed. Many of these concerns tie into issues of ecosystem destruction (including the loss of environment involved in carbon capture) discussed above. Other concerns related to the direct impact on wildlife (e.g. birds being killed by turbines). Some of these respondents cited alternative sources of evidence, while others voiced general concerns about the impact on wildlife.

*The MacArthur Windfarm in Victoria, Australia, which is tiny when compared to the proposal in question, kills at least 1,500 birds a year. This includes 500 rare or endangered raptors such as Wedge Tailed Eagles, Brown Falcons, Nankeen Kestrels, Black Shouldered Kites and Spotted Harriers... In 2014, The Smithsonian Institute (USA) calculated, from a meta analysis of published data, that up to 328,000 birds were killed every year by wind farms in the States by wind turbines. They projected that the number would grow as the size of turbines increased, because they kill more birds, particularly raptors...So if the proposition went ahead it would probably clear the Welsh Skies of Kites and Buzzards in addition to a host of other birds.*

*The impact on wildlife would be tragic, we have red kites, buzzards and peregrine falcons in our valleys, together with all the other bird species and bats, which would be at risk.*

*Apart from birdlife, turbines cause catastrophic destruction of pollinating insects on which a large proportion of our food and fruit crop production depends.*

*There is insufficient road and highway access across North Powys to facilitate large scale wind development and associated infrastructure. To gain required access would mean tearing up hedgerows and possibly road-widening together with endless road works: how 'green' is all that? It is clearly not. which is hardly in the interest of the*

*environment, to say nothing of the wanton destruction of that environment...My understanding is that the huge concrete plinth upon which they stand also not only has to be replaced but re-sited, thus leading to an ugly concrete patchwork across what was beautiful countryside. There are also serious drainage issues that come with this.*

As illustrated by the above respondent, there were also fears that wind turbine installation raises risks of flooding as well as potentially lowering water supply and quality.

Wind turbines were also seen to have negative impacts on the health and wellbeing of people living close to them. These include effects of noise; light flicker and the undermining of the positive effects of green space on health and wellbeing as discussed above.

Some respondents suggested that renewable energy isn't as environmentally friendly as it first appears. These concerns pointed out that the production (including mining of natural resources), transportation, installation and decommissioning of various parts of wind turbines and solar arrays have detrimental effects on the environment. This included concerns about the negative environmental impacts on places and people beyond Wales.

Another key concern was that rural Wales does not have the road infrastructure to cope with the installation and maintenance of wind turbines. It was felt that the resulting long-term traffic chaos will have negative impacts on local communities and on tourism.

*There is insufficient road and highway access across North Powys to facilitate large scale wind development and associated infrastructure.*

*What about access roads for transporting turbines? In the hills, single track roads where even small cars have to reverse for each other are the norm. To get turbines to their destinations involves major disruption on all roads, and traffic hold-ups to enrage the tourists. As the Tourism Company's Mid Wales Regional Tourism Strategy stated in 2011, driving in the region is still a pleasure. With little public transport, what will become of tourism if that ceases to be true?*

*There is insufficient road and highway access across North Powys to facilitate large scale wind development and associated infrastructure. There would be extensive damage to the narrow and winding lanes which are unsuited to the type of development required.*

There were some concerns that the cumulative effects of an increasing number of wind turbines hadn't been considered.

Some respondents suggested that renewable energy generation won't address climate change and/or reduce emissions and that that evidence on its use is mixed, with some suggesting the importance of renewable technology is a hoax. Others felt that renewable energy won't produce enough electricity to meet demand and that the costs will be greater than the energy output. Related concerns revolved around the ability of the grid to cope with fluctuating energy output.

There were concerns about energy transportation and the infrastructure needed to transport energy to the national grid with suggestions that long lines of new cables will stretch across rural Wales, mostly above ground. This raised concerns about the environmental and visual impact of this infrastructure as well as the negative impact on

local communities during its installation and maintenance. There was some feeling that energy companies should pay for power lines to be buried.

There were concerns that wind and solar energy infrastructure would reduce local house prices with one example given of where this happened.

There were some suggestions that Wales already produces enough electricity and it shouldn't try to produce more. Some people said that Wales shouldn't be producing energy to transport beyond its borders.

People also suggested that brownfield and urban sites should be considered for solar and wind energy generation infrastructure.

There was also some agreement for a focus on smaller-scale wind and solar developments.

### **Alternatives energy strategies**

There was a lot of support for alternative energy strategies to wind and solar energy generation.

A lot of people pointed out the necessity to consider the natural environment's role in carbon capture. This was in terms of avoiding the destruction of this environment, as outlined above, but also in terms of the need to actively restore or promote ecosystems that uptake carbon.

There were suggestions that the efficiency of existing wind farms should be maximised. This included some discussion of some turbines which have never produced energy to the grid.

There were quite a few people in support of ensuring that all new developments were built to green standards, including water harvesting and energy production.

Some said that individuals and companies should be educated in saving energy.

As can be seen from this summary, across Powys, the general feeling among residents who responded was that they felt the NDF fails to listen to their voices when they express opinions about the character and needs of their rural localities and the impact these might have on planning. While most agree with the overall aims of the NDF, many residents of rural Powys feel that they, their communities and their landscapes are disenfranchised by NDF and Welsh Government. There is not an objection to the NDF in principle but the feeling that the NDF is building a legacy for the rural Wales and its residents and that the NDF should take a more nuanced approach to Wales to ensure they get that legacy right.

### **Other Energy-related Submissions**

This section consists of a summary of 34 responses which mostly discussed NDF plans for renewable energy production through wind and solar methods, and in particular plans for the installation of wind turbines. An equivalent, and much larger (161), group of these responses who focused solely on Powys, were summarised separately. The responses summarised in this section mostly focussed on concerns about NDF plans in Anglesey. However, some respondents made points about wind turbines and/or energy production in general and which were geographically non-specific.

Across these responses, people discussed themes that have been well explored elsewhere in this document. These include concerns that: health impacts of turbines have not been evaluated; renewable technology will not generate enough energy for the investment; there are issues for the grid surrounding fluctuations in energy produced from wind and solar sources; there is not enough evaluation of environmental impacts of wind turbines; wind turbines aren't environmentally friendly due to their production, transportation, installation and the decommissioning of their parts; the negative visual impact of infrastructure; the detrimental impact of renewable energy infrastructure on tourism; issues around the infrastructure (e.g. roads) needed to support the installation and maintenance of renewable energy technologies; the infrastructure needed to support power to the grid; the need for alternative energy production/saving methods; local democracy is being undermined; the centralisation of planning process and undermining local decision-making (again the case of Hendy Wind Farm in Llandegley was cited); the consultation lacked breadth; the relationship between different planning levels and which has priority is problematic; the lack of joined up national policies; and contradictions in NDF objectives (e.g. states positive links between green space and positive wellbeing but is in favour of development of green space).

Reiterating these well explored concerns in this section will only repeat the insights produced across the whole summary. Instead, the alternative insights raised by these respondents are outlined below.

### **Contesting boundaries designated by NDF**

There were concerns among respondents about various boundaries drawn within the NDF. Many of these concerns differed to boundary concerns discussed elsewhere. One respondent made the general point that, while they agreed with constraint mapping, the boundaries the process produces should be flexible in order to account for local conditions. This, they suggested would allow local planning authorities some flexibility in planning their own policies:

*We are concerned with the approach used to determine some of the Priority Areas. Whilst we agree with the use of constraint mapping to identifying the most suitable places for developments, having hard defining lines for the edge of Priority Areas can be counterproductive. Very often, high level planning tools used to direct developments to certain areas can be too general and often overlook certain constraints which make such areas unsuitable, or will exclude suitable areas on the basis of broad-brush, rather than site specific, constraints data...We would therefore suggest building in some flexibility around the boundaries of Priority Areas. The guidance should be clearer around the priorities given for developments that could potentially fall on the edge of a Priority Area or just outside. It may be worth considering having vague or broad-brush boundaries for Priority Areas rather than hard definitive lines which may give local planning authorities some flexibility when forming their own policies. An alternative may be to review the criteria used when assessing and forming the Priority Areas to include a wider scope of constraints.*

This response was from a group with a commercial interest in renewable development and who suggested an extension to the southern part of Priority Area 5. The suggestion of flexible borders here, appears to be about local planners having the capacity to extend development rather than the capacity to restrict it. This was supported by another respondent in favour of development, which also suggested that the Priority Areas would hinder development in

areas outside of their catchment. A third respondent produced a very detailed technical proposal for extending Priority Area 14. Their submission aimed to “draw attention to apparent weaknesses in the refinement process to identify Priority Areas for wind energy as part of the assessment of onshore wind and solar energy potential in Wales.” The conclusion of their study was that Priority Area 14 should be “extended slightly to the east to include the refined Strategic Search Area of SSA E of the NPT Local Development Plan”. One reason for this was their suggestion that the 250m assumed turbine height used in the NDF Priority Area designation process should be in the 150m-175m range:

*Setting the turbine tip height at a level far beyond what currently exists, and which may never exist in an onshore version, carries a very real risk of scoping out areas with excellent wind resource and very few constraints, for no valid reason. This would not preclude the deployment of larger turbines if site assessments concluded the impacts were acceptable*

One respondent said that the use of boundaries in the NDF was contradictory. On one hand, it focuses sustainable development within 3 large areas, but also argues that large-scale wind farms should be concentrated in a smaller number of Priority Areas. They suggest that, for consistency, energy policies should also be focussed around the 3 Regions.

Other boundary concerns focused mainly on Anglesey and the designation of Priority Area 1 within it. These responses generally questioned the suitability of Anglesey for wind turbines. One respondent, in another detailed and technical submission, said the final designation seemed to deviate from the evidence as they understand it. They felt that a crucial element of boundary selection was unclear:

*The methodology used is detailed, clear and transparent except for the most important part, selecting the actual Priority Areas, which is densely opaque and gives the impression other, undeclared reasons are behind the finally selected areas. Without clear explanation of the rationale behind these decisions it is impossible to know if the framework is appropriate*

These feelings were echoed by another respondent who suggested that critical findings in an earlier report by Arup for The Isle of Anglesey and Gwynedd Councils, were “glaring omissions” in the later reports, also by Arup, for the NDF. The respondent suggested that this “call[ed] into question the validity and/or motives of selecting Anglesey as a Priority Area for large scale wind energy”.

## **Wind turbine height**

Another group of people raised specific objections to wind turbines based on their height. One person made the general point that:

*It must be clear to all involved that it is totally impossible to ‘minimise the landscape and visual impact’ of 150 metre high turbines*

However, objections were mostly on the basis that high turbines are unsuitable for Anglesey which is a small, flat island and as such, the visual impact of the turbines would be exacerbated:

*The island is geographically flat so the effects of these monstrous towers will be seen, not only across the island but in many areas on the mainland*

*The scale and type of generating technology, particularly 150 - 250 m high wind turbines, is simply not appropriate for an island rarely more than 100 m above sea level*

### **Occasionally reported concerns**

There were other concerns that were raised within this group of responses and that were not raised elsewhere. Each of these were only raised by one or two respondents.

First, one respondent suggested that there had been no quantification of the financial costs of wind turbines on policing and the NHS. Impacts on the NHS appear to be in terms of the negative health impacts of wind turbines. The reason for impacts on policing costs are not clear although it could potentially be related to policing protests etc.

One respondent said that green energy was making heavy industry uncompetitive:

*...this green policy is increasing electric energy costs making heavy industry uncompetitive. The UK is already has one of the highest electricity costs. This has already had an impact to our steel making industry.*

Another concern reported by only one person was that, within the NDF, while Policy 10 on the surface appears to include protective measures to minimise the impacts of wind turbines, it *“hides a number of points that could be critical to an application for development being acceptable or not”*. Promised guidance on the development of onshore wind and solar energy in Priority Areas is also seen as lacking. As a consequence, the respondent suggests that:

*The protective measures of the planning process are poorly defined and could be interpreted to make development inappropriate, and so selection of Priority Area 1 meaningless, or could be interpreted to provide no protection at all.*

Two people said that they have concerns about the politics behind the NDF where they felt that political and personal agendas were influencing it:

*the political sector...now appears to me is an uncontrolled workplace driven nowadays by personal ambition and the accumulation of personal wealth*

*With virtually no exclusions the Priority Areas are all located in locations which did not vote for Labour so that a cynic might argue no votes will be lost here.*

One person summed up a general feeling underlying many responses, which suggested missing detail in the NDF concerning renewable energy generation:

*Overall, the entire section of the NDF concerning renewable energy appears like a collection of input material to a first draft, but requires much more thought and consultation before it can be considered anywhere near mature enough for policy*

### **Alternative insights to themes developed elsewhere**

This group of responses also brought alternative insights to themes summarised elsewhere. These thoughts are discussed below.



There were alternative suggestions regarding localised renewable energy production as an alternative to large-scale wind and solar infrastructure. One respondent in this group discussed how this model also keeps money in the local economy rather than it going to a multinational corporation. Another respondent justified grants for home-based renewable energy production by comparing it to the grants for new fires and central heating provided by government in the past.

One respondent added to concerns about the potential negative impacts of wind turbines on the tourist economy, speaking from the perspective of guidebook writers:

*As a member of the Outdoor Writers' & Photographers' Guild I am well aware that my colleagues who write guidebooks do not wish to touch Mid-Wales, given the on-going assault on its landscapes by the wind industry. As no attempt has been made to carry out even a basic tourism survey it is indelibly clear that WAG could not care less about the Welsh countryside, and that this scheme has been concocted by city-dwellers*

One respondent added to discussions around grid infrastructure, suggesting that any new grid infrastructure would have to be developer-led and that NDF does not place enough emphasis on this infrastructure:

*From our discussions with the two Distribution Network Operators serving Wales and with National Grid, they all advise that any new grid infrastructure will have to be developer led. We have seen from past experience in mid Wales that new grid infrastructure can only be delivered by developers with the full support of the Welsh Government. Given this, the document doesn't place enough emphasis on the requirement for new grid infrastructure to meet the targets and objectives it sets out. The Welsh Government's role in the need to upgrade Wales' grid infrastructure to accommodate the decarbonisation and increases in demand from transport and domestic heating use through electrification will be a huge challenge. The NDF will need to give the Welsh Government the wide scope of policy support it needs to deliver on this. We believe as drafted this has been underestimated in the Draft NDF.*

Across all responses, many people sought to place Wales and the NDF strategy into a wider context. Here, one respondent said that Wales should take a lead from other countries which tend to put their wind turbines into urban areas. Other people echoed comments summarised elsewhere in this document, that in England there is more tendency towards landscape preservation than in Wales:

*While the English are creating new national parks in areas of less scenic quality than much of Wales which is outside our three NPs, and places like Surrey and Sussex have no wind turbines, places like Powys, one of the poorest counties in the UK, will be further impoverished by these plans.*

As a caution against wind turbines, two respondents discussed the existence of turbines that have been but are yet to generate electricity for the grid. One person spoke in general terms of this issue, while the other named developments at Bryn Blaen and Llandegley, with the former still not producing electricity after 2 years. This issue has been raised elsewhere but not to a large extent.

Another set of issues surround concerns about energy production and renewable technologies, to which this group of responses also brought additional insight. One person suggested that the way forward is not just about new renewable infrastructure:

*There is plenty of evidence to suggest solutions are already available including an energy mix, more sustainable methods of working and delivering projects using existing research, funding and innovative ideas all able to provide employment, the green economy and enhance well-being of the nation*

As elsewhere, many concerns around energy production focused on concerns that renewable energy sources lead to fluctuations in energy production that the grid will struggle to cope with. In this group of responses, respondents made related points not discussed elsewhere. For example, there was discussion of the need to invest in storage (e.g. battery storage; pumped-storage) in order to reduce the impact of energy fluctuations to the grid.

Several people suggested either that that NDF lacked proper power projections or that the projections in the HDF were wrong:

*The level of generation potential is simply alarming - from onshore wind and solar in the 15 Priority Areas there is the potential to generate 1/3 of the UK's demand! With the generation offshore in the NMP, and nuclear in policy 22, Wales will be generating almost 50% of UK demand. I cannot believe this is intended...This level of generation does not align with many estimates of the growth of renewables, including:*

*"Thirty recommendations by 2030" prepared for the Labour Party*

*"Re-energising Wales" by the Institute for Welsh Affairs*

*"Zero Carbon Britain"<sup>4</sup> by the Centre for Alternative Technology*

*"Future Energy Scenarios 2019"<sup>5</sup> by National Grid ESO*

*[T]he RE assessment does not set out a clear statement of current and projected electricity generation and consumption, ignores the fact that Wales is a net exporter of electricity, and fails to quantify the level of additional output required to reach the target of 70% by 2030*

Many of those concerned about projection issues, also suggested the need to align Welsh energy policy with UK energy policy (e.g. 2011 UK Renewable Energy Roadmap):

*The electricity system is operated as an integrated UK whole. Welsh policy should reflect this or propose an alternative approach...Welsh policy needs to further evolve to reflect these issues and align with UK policy. The intentions of its policy on the levels of exports to England should be made clear.*

Some expressed concerns that Wales was providing energy for the UK at the expense of its own landscape. These related to concerns that Wales was being exploited by the UK for energy provision, with one person invoking the "depredations" suffered by Wales from coal production and the flooding of the Elan Valley.

Another made a technical point that they felt was wrong in the NDF, concerning the difference between energy and power. They suggested that generation capacity must be calculated in terms of power (kW) rather than energy (kWh). Not doing this is problematic, and the difference needs to be accounted for in the plan:

*The NDF proposals are based on a capacity target for wind and solar set by outside consultants (with a significant interest in the wind and solar industries) based solely on energy consumption. **This is spurious and will not withstand independent inspection.** They have compounded this by the incorrect use of capacity factors*

Discussions of how NDF relates to other Welsh policy have also been summarised elsewhere in this document. Additional issues about policy raised by respondents in this group include: Wales needs an overarching Welsh energy policy; Welsh policy needs to link to 2008 Climate Change Act and 2011 UK Renewable Energy Roadmap; and the need to clarify whether NDF aligns with Section 38(4) of the Planning & Compulsory Purchase Act 2004.

Finally, many respondents raised concerns about the consultation process. Again, many of these echoed concerns summarised elsewhere. However, some alternative thoughts were expressed. Again, there was dissatisfaction with the consultation process with one respondent clearly expressing a strength of feeling regarding the consultation process, that was implicit in other comments. This was in relation to the NDF policy on renewable energy, of which they said, it is “a sales pitch unworthy of government. There is no attempt to produce an evidence base for these claims”. This seems to tie in with concerns that the consultation process was a *fait accompli* which wasn't genuinely interested in local voice, with one respondent suggesting that planning issues are secondary to achieving other targets, by which they seem to mean energy targets.

One person said that the associated documents were hard to read or understand, which also came up infrequently in the questionnaire responses. Others were concerned about the breadth of the consultation with one person suggesting that the NDF is so important to the whole population that every house should have been leafleted about it. Another said that the NDF document needed more detail.

### **Standardised Submission**

4.6.12 Standardised submissions are where multiple identical responses have been made on a particular issue.

67 individuals, two town councils and one community council in Anglesey submitted identical or near identical responses objecting to wind and solar development in Anglesey on the basis of the height and scale of turbines being too large, the possibility of using alternative energy sources, a lack of clarity or evidence base for the priority areas, and inadequate consultation.

### **Welsh Government Response – draft Policy 8: Strategic Framework for Biodiversity Enhancement and Ecosystem Resilience**

4.6.13 The strategic policy for biodiversity enhancement and ecosystem resilience remains broadly as set out in the draft NDF. The policy has been strengthened, ambiguity addressed and clarity provided regarding

expectations for delivery. As a result of other changes, the policy will be renumbered Policy 9.

- 4.6.14 The policy has been slightly re-framed and re-titled to more closely reflect a broader policy context that specifically identifies green infrastructure; Policy 9 Resilient Ecological Networks and Green Infrastructure. The tone of the policy now more closely reflects the supportive legislative framework and it addresses consultation concerns regarding the need to protect the existing and the potential natural resources (alongside creation of new resources), the need for the policy to apply at all scales of planning and the need to embed enhancement (net benefit) in all interventions.
- 4.6.15 The broad thrust of the draft policy was generally supported but the lack of specificity within the policy raised concerns amongst consultees, particularly with regard to species protection and there was a call for a specific designated sites policy. The policy now provides for species protection and more explicitly explains the wider significance of designated sites within a safeguarding and green infrastructure approach.
- 4.6.16 The redrafted policy provides a strong framework for environmental protection and the sustainable management of natural resources. The bar is very high; identifying areas to be safeguarded as resilient ecological networks, identifying opportunities for strategic green infrastructure and in all decisions delivering a net benefit for biodiversity is a solid foundation to meeting the demands of a climate emergency and an ecological crisis. The ambition for this policy is supported across Government. Through pragmatic leadership further guidance will be issued to support lower tier delivery mechanisms.
- 4.6.17 Addressing consultee concerns regarding the lack of detail and clarity around the delivery of the policy, the supporting text has been substantially redrafted.
- 4.6.18 The functional role of resilient ecological networks within a planning context has been detailed, outlining the critical importance of such networks within a climate emergency and ecological crisis and the role which the planning system can play within a wider context of sustainable management of natural resources. The importance of securing a net benefit for biodiversity has been elevated within the supporting text and referenced in other strategic level policies where this can be secured (shaping urban growth and flooding).
- 4.6.19 The connections between designated sites and wider ecological networks have been more strongly emphasised and made more explicit in the supporting text and the stepping stone function detailed.
- 4.6.20 Consultees raised concerns regarding the practicality of applying a safeguarding approach as part of the policy framework. Detail has been provided in the supporting text outlining the safeguarding concept and policy intent. The supporting text also provides flexibility for lower tier plans to adopt a safeguarding approach that best suits their individual circumstances.

4.6.21 The role of green infrastructure in supporting the principal policy objectives is also outlined. The supporting narrative provides a strong policy context to drive implementation of the policy.

The proposed changes address Conclusions 12, 13, 19, 44 – 46, 49 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details

## Welsh Government Response – draft Policy 9: National Forest

4.6.22 The policy text will remain largely unchanged save for a small amendment to provide more clarity. As a result of other changes this policy will be renumbered Policy 15.

4.6.23 The national forest policy is a positive and ambitious policy which is supported across government and respondents largely acknowledged this although some felt the policy and supporting text could be more ambitious again

4.6.24 Responses to the National Forest policy were on the whole positive and favourable. Nonetheless, there were comments on how the policy could be improved where it was felt the policy or supporting text could provide more information.

4.6.25 A series of themes emerged from the consultation responses which included respondents feeling more detail was required; a need for recognition of commercial forestry; concerns over a policy which was felt solely focuses on forests and not other ecosystems; and the positive effects the national forest can have on climate change, well-being and tourism. Although this is noted, the national forest is one policy in a number in the NDF and the policy should not be read in isolation particularly without reading the policy on green infrastructure and biodiversity. Nevertheless ecosystem resilience is now recognised in the supporting text.

4.6.26 The final paragraph from draft Policy 8: Strategic framework for biodiversity enhancement and ecosystem resilience - has been moved to the supporting text of the National Forest policy. This text highlights the wide-ranging benefits woodlands provide to society. This was done following comments from stakeholders concerning the role forest can play in terms of climate change abatement but also the “right tree in the right place” concept.

4.6.27 Wording has been added to the supporting text regarding how the planning system can facilitate tree planting as part of development proposals and an example given of utilising section 106 agreements for the aim of increased tree coverage.

4.6.28 Clarity in the text has been provided on the role the forest will play and the three strands it will comprise of. This is to align it with the work on-going across government, and in response to comments which called for more detail and queried the function of the national forest

4.6.29 In response to comments about the positive effects the national forest could have on climate change, wording has been incorporated to highlight its potential role in climate change mitigation while also highlighting the positive role it has to play in water and flood risk management.

4.6.30 In terms of habitat and species creation, the text has been revised to include reference to the fact that reforestation should not compromise wider ecosystem resilience.

4.6.31 A reference has been added to the text to cite the 2,000ha per annum tree planting target.

The proposed changes address Conclusions 44, 47 and 48 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.

### **Welsh Government Response – draft Policies 10 to 15 Renewable Energy and Heat Networks**

- **10 - Wind and Solar Energy in Priority Areas**
- **11 - Wind and Solar Energy Outside Priority Areas**
- **12 - Wind and Solar Energy in National Parks and Areas of Outstanding Natural Beauty, and**
- **13 - Other Renewable Energy Developments**
- **14 – Priority Areas for District Heat Networks**
- **15 – Masterplanning for District Heat Networks**

have been revised and replaced by

- **Proposed Policy 16: Heat Networks**
- **Proposed Policy 17: Renewable and Low Carbon and Associated Infrastructure, and**
- **Proposed Policy 18: Renewable Low Carbon Developments of National Significance.**

4.6.32 The Welsh Government recognises that our energy system is in a period of transition as we move rapidly to decarbonise our energy generation. In the future we anticipate moving to a ‘multi-vector’ approach where a range of technologies, at different scales, are used to generate electricity as close as possible to communities where those benefits can be realised to the maximum and the need for large-scale grid infrastructure to support them is minimalised. Whilst to some responders the draft NDF appeared to only

support wind and solar developments (due to the high profile spatial approach), it did, in fact, support all types of onshore renewable and low carbon technologies. Offshore technologies are not covered by the town and country planning system although policies elsewhere are being strengthened to support the onshore elements of offshore schemes.

- 4.6.33 All large scale renewables (including wind and solar developments) can have an impact on their surrounding environments. This is appropriately assessed within the planning system to ensure that those impacts are minimised as far as possible to make a scheme potentially acceptable. This process (including the Environmental Impact Assessment and, where appropriate a Habitats Regulations Assessment) take into account the impacts on landscape and the environment more generally. It is Welsh Government policy that community benefits should be maximised wherever possible.
- 4.6.34 Decisions on larger scale projects have been taken by Welsh Ministers since the commencement of the 2015 Planning (Wales) Act, the National Development Framework allows the alignment with policy and decision making at an appropriate level where decisions on strategically important schemes are taken efficiently in the national interest. Local authorities have the opportunity to participate in this process by way of Local Impact Reports. LDPs will need to conform the NDF once it is published.
- 4.6.35 The Welsh Government recognises the contribution that smaller and community scale developments will have to our future energy system, however it is not envisaged that they will produce enough renewable energy to meet our needs. We therefore need to plan proactively for larger scale developments which will make a larger contribution to our targets.
- 4.6.36 The Arup report was commissioned by the Welsh Government in 2018 and used a commonly-used methodology for mapping constraints to identify the most suitable areas for large scale wind and solar. These constraints were discussed and agreed with stakeholders through four workshops, which occurred in the autumn of 2018, before modelling of the areas commenced. Representations have queried the additional use of residential properties as an additional constraint along with road, railway and river corridors. Arup have undertaken additional modelling which demonstrates that this would rule out much of Wales and is therefore it is unfeasible to do this. This is particularly so where residential properties could be purchased or form part of an ownership agreement to make a scheme acceptable to nearby residential properties, therefore requiring a smaller or no buffer to be used.
- 4.6.37 The Ministry of Defence (MOD) have raised concerns regarding the protection of their estate and strategic training areas. The areas have therefore been refined, in consultation with the MOD, to address these concerns. A revised map will be published in the NDF.

- 4.6.38 The solar industry has pointed to the need for flexibility in the policy position as it is more agile in responding to the grid capacity and applications for solar farms do not have as much of an impact on the wider landscape as wind turbines. The Welsh Government accepts this and has therefore decided to delete the areas identified for solar development from the NDF.
- 4.6.39 In terms of grid connections, the Welsh Government considers that the NDF policies could be more explicit in our policy towards grid infrastructure. This will be reflected in changes to the policy.
- 4.6.40 The term 'Priority Area' has also caused confusion. It was not the policy intention that these areas should be considered first. However it is accepted that this term, coupled with the 'traffic light' approach advocated could have had this affect. The traffic light model has therefore been removed. The Priority Areas have been retitled 'Pre-Assessed Areas' to better reflect their position as areas where the Welsh Government would like to see barriers reduced to large scale wind energy developments. This is not to say that these developments will not go through the full scrutiny of the planning processes. All planning applications, regardless of their location, will be determined under the same policy framework.
- 4.6.41 In terms of a criteria-based policy, whilst the draft NDF policies did contain criteria regarding the issues to be considered at the development management stage, the Welsh Government accepts that this criteria was not detailed enough and could cause confusion as to how they would be applied.
- 4.6.42 The Welsh Government is therefore proposing to delete all of the draft renewable energy policies and replace them with two policies which apply to all renewable and low carbon energy technologies. The first policy gives the positive policy stance from the Welsh Government on renewable and low carbon energy generation, it goes on to give the spatial dimension of the policies which apply to national parks, AONBs and the Pre Assessed Areas. The policy also states that benefits of schemes to the wider community should be maximised and sets out our approach to grid development.
- 4.6.43 The second proposed policy relates to large scale (DNS size) renewable and low carbon developments. It is positively framed to making permitting projects the starting point, with a range of criteria which need to be assessed and found to be satisfactory, before this status is confirmed.

The proposed changes address Conclusions 21-22 and 34-43 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.



## District Heat Networks

- 4.6.44 The need to consider heat networks as a genuine source of heat in the future is clear. The UK is preparing for regulatory changes to enable heat networks to operate more efficiently and effectively and the recent Building Regulations Part L consultation considers that heat networks could be part of the energy efficiency measures built in to new development in the future. It is right therefore that the Welsh Government seeks to request that local planning authorities and developers begin to examine the potential for heat networks as take-up has been slow to date.
- 4.6.45 Heat networks can operate at many different scales, from two buildings or a block of flats, to city-wide networks connecting waste heat sources with major heat consumers. It is therefore not appropriate to apply a larger threshold for developments to consider a heat network as opportunities may be lost.
- 4.6.46 It is, however, appropriate for the policy to refer to waste sources of heat and the need to use low carbon energy sources wherever possible to ensure these projects help to contribute towards decarbonisation targets; either now or in the future.
- 4.6.47 Support for heat network planning is already available from the UK Government. Part of the Welsh Government's Renewable Energy Toolkit for planners also contains information on how local planning authorities can begin to map the potential in their areas. The Welsh Government will also be considering what further assistance and guidance it can give in the future.
- 4.6.48 It is considered prudent to combine the two draft district heat network policies for the sake of efficiency and to reference low carbon and existing sources of heat. In addition, responses from local planning authorities highlighted the existing work which has been carried out in Ebbw Vale and Port Talbot; these will be added to the list of Priority Areas for Heat Networks. The proposed combined policy for District Heat Networks will be Policy 16 - Heat Networks.

## 4.7 THE REGIONS

### ***Full response form Questions 8 - 11, and easy-read Questions 5 - 7***

- 4.7.1 This section covers questions relating to the three Welsh regions identified in the draft NDF. Each question, apart from question 8, covers multiple policies. Each question from the main questionnaire is set out separately below, together with the policies they are associated with. A table of statistics follows each question.
- 4.7.2 There is one table of main themes and one overall commentary to cover all questions and associated policies (as is the case with questions 6 and 7 above).
- 4.7.3 After the main themes and commentary the easy-read questions, table of statistics and themes and commentary are set out.
- 4.7.4 The Welsh Government Response to all of the above then follows.

#### **Question 8**

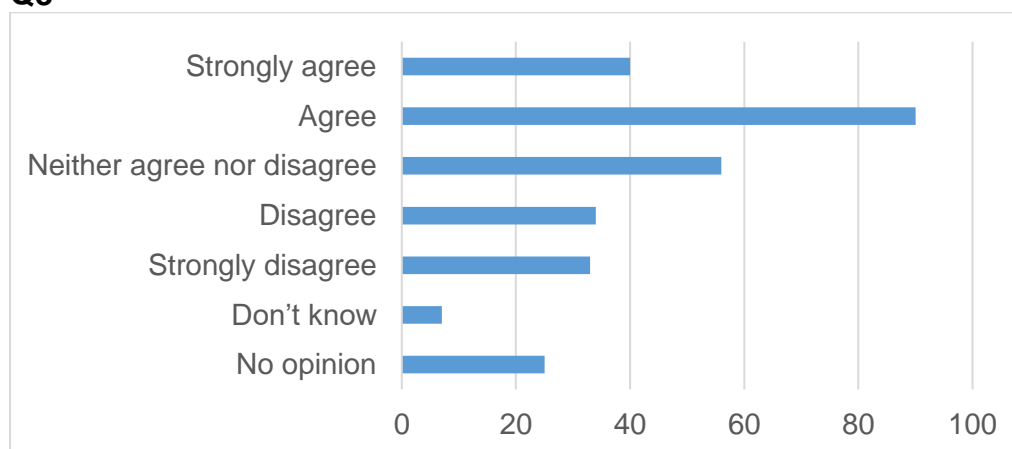
Policy 16 – Strategic Policies for Regional Planning

Q8. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

#### **Question 8 - Statistics**

- 4.7.5 Chart Q8 shows the number and extent to which respondents agree or disagree with the question. The table following the chart shows the exact number and percentages of respondents expressing a view.

#### **Q8**



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion	Total
Number	40	90	56	34	33	7	25	285
Percentage	14	32	20	12	12	2	9	100

### Question 9 – North Wales

#### Policies:

- 17 – Wrexham and Deeside
- 18 – North Wales Coastal Settlements
- 19 – Green Belts in North Wales
- 20 – Port of Holyhead
- 21 – Transport Links to North West England
- 22 – North West Wales and Energy

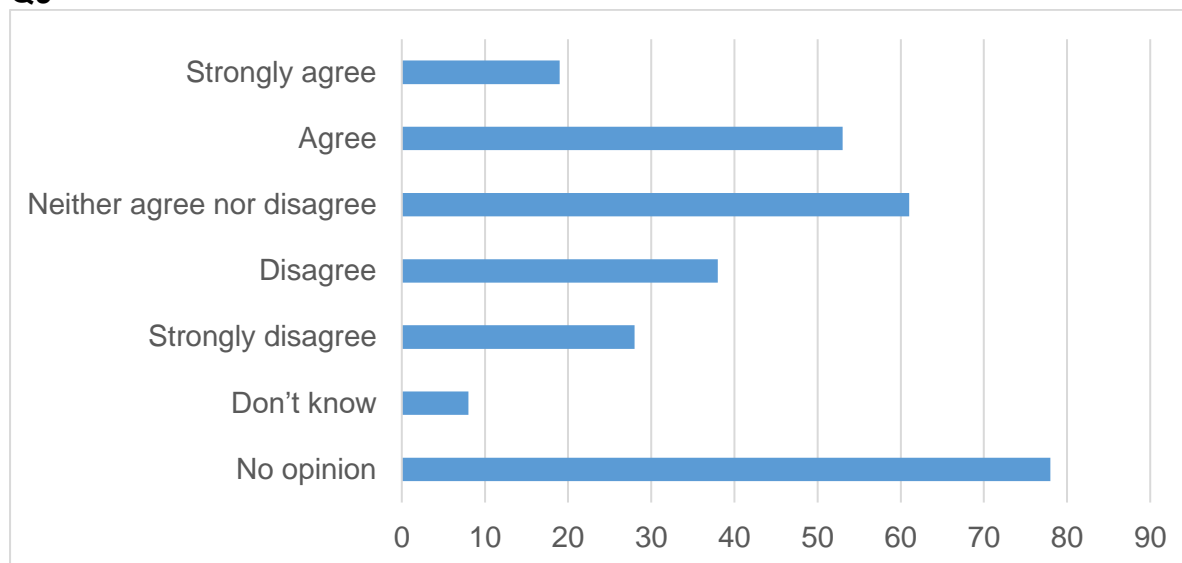
We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved 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.

Q9. To what extent do you agree or disagree with the proposed policies and approach for the North Region?

### Question 9 - Statistics - North Wales

4.7.6 Chart Q9 shows the number and extent to which respondents agree or disagree with the question. The table following the chart shows the exact number and percentages of respondents expressing a view.

## Q9



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion	Total
Number	19	53	61	38	28	8	78	285
Percentage	7	19	21	13	10	3	27	100

### Question 10 - Mid and South West Wales

#### Policies:

- **23 – Swansea Bay and Llanelli**
- **24 – Regional Centres**
- **25 – Haven Waterway**
- **26 – Swansea Bay Metro**

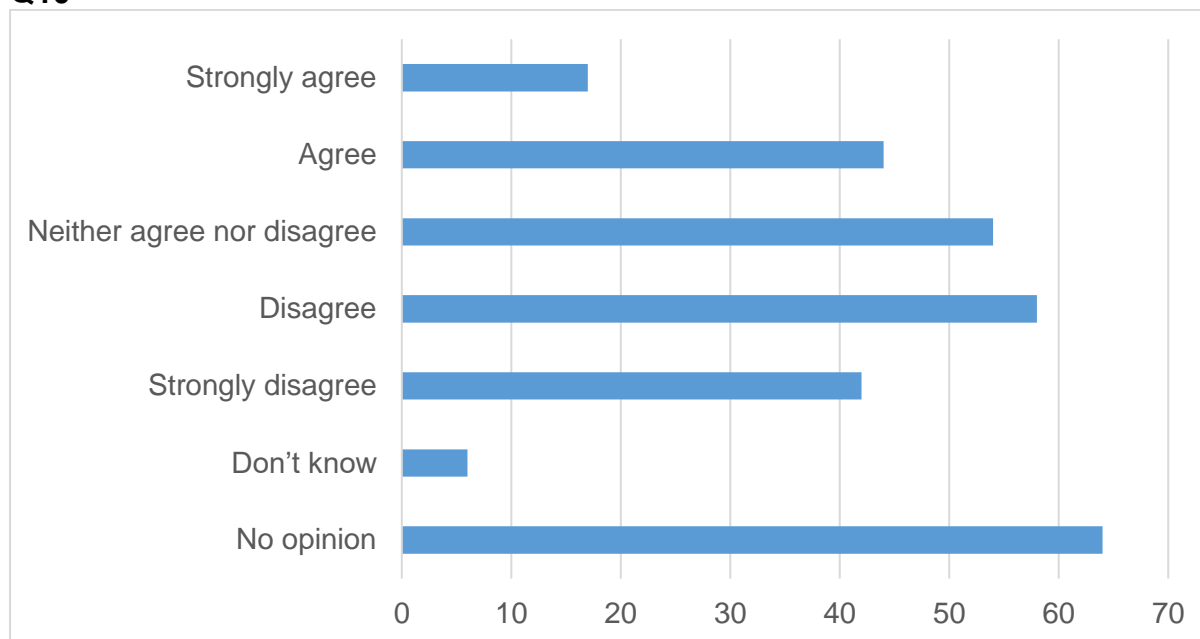
Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

Q10.1 To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

### Question 10 - Statistics - Mid and South West Wales

4.7.7 Chart Q10 shows the number and extent to which respondents agree or disagree with the question. The table following the chart shows the exact number and percentages of respondents expressing a view.

## Q10



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion	Total
Number	17	44	54	58	42	6	64	285
Percentage	6	15	19	20	15	2	22	100

## Question 11 - South East Wales

### Policies:

- **27 – Cardiff**
- **28 – Newport**
- **29 – The Heads of the Valleys**
- **30 – Green Belts in South East Wales**
- **31 – Growth in Sustainable Transit Orientated Settlements**
- **32 – Cardiff Airport**
- **33 – Valleys Regional Park**

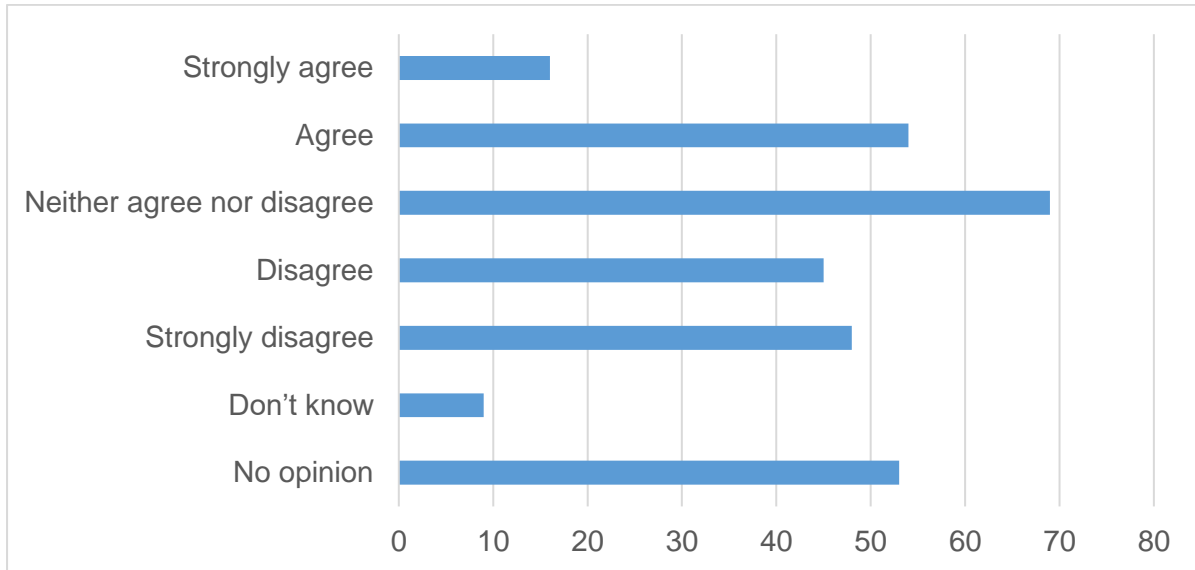
In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated 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.

Q11 To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

### Question 11 - Statistics - South East Wales

4.7.8 Chart Q11 shows the number and extent to which respondents agree or disagree with the question. The table following the chart shows the exact number and percentages of respondents expressing a view.

**Q11**



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion	Total
Number	16	54	69	45	48	9	53	294
Percentage	5	18	23	15	16	3	18	100

### Questions 8, 9, 10, 11 - Main Themes - North Wales, Mid and West Wales, and South East Wales

4.7.9 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment. It covers questions 8,9,10, and 11.

Theme	Code	Count
<b>Mid and South West Wales region</b>	Disagree with grouping of rural mid-Wales and Swansea/rural mid-Wales communities should be considered as a separate entity/too diverse	<b>40</b>
<b>General opposition</b>	Disagree with the regional split/shouldn't divide Wales	<b>32</b>
<b>Transport</b>	Better transport links/ connectivity within Wales	<b>25</b>
<b>South East Wales region</b>	Disagree with plans for greenbelt in the South East/will be a barrier to development/isn't backed by evidence	<b>23</b>

<b>Mid and South West Wales region</b>	Mid-Wales is being ignored/should be more emphasis on my area/NDF doesn't have enough policies aimed at specific area e.g. Welshpool, Powys	<b>22</b>
<b>Specific areas should be given more emphasis</b>	No mention of [specific area] / my area is missing as a centre of importance / disagree with regional growth centres / no development plan for specific area	<b>22</b>
<b>Housing</b>	NDF proposed levels do not match SDP/LDPs/ previous predicted needs/ question housing figures	<b>19</b>
<b>Rural areas</b>	Not enough detail or emphasis given to rural communities in plans/how will rural communities be supported for growth/too much emphasis on urban areas	<b>17</b>
<b>Greenbelt</b>	Disagree with greenbelts in Wales/greenbelts generally will restrict tourism/the economy/infrastructure/housing/ overlaps with growth areas	<b>17</b>
<b>South East Wales region</b>	Concern with impact to transport infrastructure/transport infrastructure insufficient for increased developments e.g. Cardiff Airport	<b>17</b>
<b>South East Wales region</b>	Too much emphasis on Cardiff/Cardiff gets all the benefits/funding	<b>16</b>
<b>Cardiff airport</b>	Oppose Cardiff Airport/doesn't fit with sustainability proposals	<b>16</b>
<b>Joint working</b>	Need joined-up/national approach	<b>14</b>
<b>Three region model</b>	Alternative geography/split of regions suggested	<b>14</b>
<b>General support</b>	Generally agree with principles/aims/outcomes of the NDF	<b>13</b>
<b>Local democracy/ decision making</b>	Request greater engagement with local/ representative bodies	<b>11</b>
<b>General support</b>	Generally agree with the regions/with the principle of creating three regions	<b>10</b>
<b>Local democracy/ decision making</b>	Doesn't give enough weight to LDPs/PSBs/area statements/LDPs and SDPs should be taken into account	<b>10</b>
<b>Alternative energy provision</b>	Government should consider offshore wind farms or tidal power/biomass/nuclear power	<b>10</b>
<b>General</b>	Plans lack detail/ contradictions in the NDF	<b>10</b>
<b>Three region model</b>	Alternative split suggested - spit Mid and South West Wales into two regions	<b>9</b>
<b>Plans lack detail</b>	Maps inadequate for decision making/need more detailed maps/need population map	<b>9</b>
<b>Greenbelt</b>	Support areas designated as greenbelt land	<b>8</b>
<b>Three region model</b>	Generally oppose three region model	<b>8</b>
<b>Local democracy/ decision making</b>	Plans oppose local decision making/want local consultation and decision making/ability to object to new wind developments/to object on grounds of impact to landscape	<b>7</b>
<b>Housing</b>	Needs to be greater rural development/should not be so much restriction on building on greenfield sites	<b>7</b>
<b>South East Wales region</b>	Support plans/ policies for Newport/ area around Newport	<b>7</b>
<b>Joint working</b>	Greater collaboration between border counties/areas and England	<b>7</b>
<b>Lack of detail</b>	Clarity on SDPs/ LDPs / amendments suggested to SDPs/ LDPs	<b>7</b>

<b>Transport</b>	Concern over traffic in South East Wales/ need to address congestion in South East Wales e.g. M4/lack of relief road	<b>7</b>
<b>South East Wales region</b>	Brownfield sites around Newport need review to meet housing plans (finite supply)/ greenfield extensions required	<b>7</b>
<b>Wind/solar developments</b>	Concerned about visual impact/ turbines will be too large/introduce buffer zones to reduce visual impact/tourism will be discouraged	<b>6</b>
<b>North Wales region</b>	Agree with proposed policies for the regions/think it is a good approach	<b>6</b>
<b>Plans lack detail</b>	Economic policies in general lack detail/ambition	<b>6</b>
<b>Plans lack detail</b>	NDF lacks detail on planned new growth for Newport/ no detail on regeneration of Newport	<b>6</b>
<b>Plans lack detail</b>	General (non-specific)/needs to be more action orientated	<b>6</b>
<b>Transport</b>	Support transport policies outlined in NDF	<b>5</b>
<b>Plans lack detail</b>	Flood risks	<b>5</b>
<b>Transport</b>	Greater investment in low carbon transport/ lack of detail on transport	<b>5</b>
<b>Housing</b>	Improve local infrastructure/employment/local amenities before housebuilding	<b>4</b>
<b>Viability</b>	Don't believe plans will happen in reality/are unfeasible/are too expensive	<b>4</b>
<b>Greenbelt</b>	Position/location of greenbelt is unclear	<b>4</b>
<b>Investment</b>	Call for greater general investment in a specific area e.g. Newport	<b>4</b>
<b>Plans lack detail</b>	Lack of detail on waste management	<b>4</b>
<b>Housing</b>	Brownfield land should be a priority	<b>4</b>
<b>Public transport</b>	Not enough detail on the Metros/ not broad enough	<b>4</b>
<b>Wind/solar developments</b>	Generally disagree with wind proposals/with mid-Wales having wind farms	<b>3</b>
<b>South East Wales region</b>	should be more emphasis on my area/NDF doesn't have enough policies aimed at specific area e.g. Cardiff, Barry	<b>3</b>
<b>Conservation</b>	Protection/conservation of historical/cultural assets/heritage should have policy	<b>3</b>
<b>South East Wales region</b>	Alternative suggestions for greenbelt	<b>3</b>
<b>Resources</b>	LPAs/ LAs don't have the resources to meet the demands of policies outlined in the NDF e.g. SDPs	<b>3</b>
<b>North Wales region</b>	Growth shouldn't be restricted to north-east Wales	<b>3</b>
<b>Plans lack detail</b>	On minerals/mineral extraction	<b>3</b>
<b>Plans lack detail</b>	Policy 30 should be re-worded/ should have more evidence	<b>3</b>
<b>Plans lack detail</b>	On the Welsh language	<b>3</b>
<b>General support</b>	Support development of SDPs	<b>3</b>
<b>Plans lack detail</b>	On tackling inequality	<b>3</b>
<b>Housing</b>	Concerned about the environmental damage of housebuilding/new houses should be eco-friendly/carbon neutral/energy efficient	<b>2</b>
<b>South East Wales region</b>	Support plans/ policies for Cardiff/ area around Cardiff	<b>2</b>



<b>Welsh Language</b>	Disagree with proposals for the Welsh language/Welsh language not a priority/Welsh speaking targets are unrealistic	<b>2</b>
<b>SDPs/LDPs</b>	Concerns about speed with which SDPs will need to be prepared and approve wind and solar developments/timing with LDPs	<b>2</b>
<b>Joint working</b>	Greater link between marine planning documents/ WNMP and NDF	<b>2</b>
<b>South East Wales region</b>	Development should be focused around the M4 corridor	<b>2</b>
<b>Sustainability</b>	Development of Holyhead as a cruise port doesn't fit with sustainability proposals	<b>2</b>
<b>Housing</b>	More houses needed in the valleys	<b>2</b>
<b>Growth</b>	Cardiff still has capacity for sustainable growth/question the assumption that Cardiff is at capacity	<b>2</b>
<b>Plans lack detail</b>	Gypsy and traveller need	<b>2</b>
<b>Alternative energy provision</b>	Energy from waste (EfW)	<b>1</b>
<b>Other (unspecified)</b>		<b>31</b>

### **Questions 8,9,10,11 – Commentary - North Wales, Mid and West Wales, and South East Wales**

4.7.10 The following section is a more detailed commentary on concerns expressed by respondents. It also includes selected quotes from respondents, presented in italic, reinforcing those views.

The NDF proposed three regions on which to focus future planning and development: North Wales; Mid and South West Wales and South East Wales. This proposed three region model drew a lot of attention from respondents to the consultation.

While there were some people who supported splitting Wales into three regions for the purposes of the NDF, more people were against the idea. For some, opposition to the split was a general principle, with some people suggesting the necessity for a joined up, national strategy instead.

*You should NOT be splitting the country into three parts, as this causes division and strife. One region will think another region is getting better or more, and they may feel like they are being left behind.*

*I don't agree that your partitions are correct. There should be more regions involved, not just 3.*

Others said that the plans were not viable; either they did not believe the plans would happen or they were unfeasible or too expensive. Others disagreed with the regional growth centres suggested in the NDF. A lot of concern revolved around disagreement with the proposed areas and alternative suggestions for regional splits were made by some.

*I feel that these matters should be viewed on a county basis as that structure is already in place and the situation in those areas is already defined and understood.*

*Members wondered why the NDF regions did not match the boundaries of the six land regions selected as Area Statements, as Area Statements were selected to rethink the way our natural resources are managed and used. Area statements were designed to coordinate work and to build the resilience of ecosystems, so having conflicting boundaries for planning issues, and management of the environment will introduce confusion.*

*There should be four regions as proposed in the report provided by Cardiff University (Identification of Regional Areas for the National Development Framework) dated June 2017. Powys should be a region in its own right designated as Central East Wales.*

Most discussion focussed on the Mid and South West Wales region and there was a lot of disagreement with the designation of Mid and South West Wales as one distinctive region. There was a feeling that the areas of Wales included in this designation were too diverse to be considered as a single planning area. A particular concern was that differences between urban Swansea and the rural parts of this region were too great for the planning area to be useful. Feelings included a sense that rural areas of Wales and their particular needs should be considered separately to urban areas of Wales.

*The three-party model is not acceptable. Powys has no commonality with Swansea and Llanelli*

*To lump mid wales with South-west Wales is preposterous. Swansea, Llanelli should be part of south Wales and Mid Wales should be properly recognised for what it is. A largely rural and agricultural area that needs special consideration for its requirements that are UTTERLY unlike those of densely populated areas in the North and South*

*The Mid and South West Wales area is too large and diverse with upland rural central Wales included with lowland farming areas, the Pembrokeshire docklands and former industrialised Swansea and Neath Valleys that currently act as affordable commuter belts for the M4 Corridor and Swansea Bay, all amalgamated together. It will be very difficult to create effective policies for such a vast diverse area*

*There is little commonality of interest between the Mid Wales region and the south west Wales region and Mid Wales should be given separate status as an independent region in order to shape an alternative model of rural sustainability founded on its quality environment, strong potential for technological innovation through collaborations between the public sector and the Universities, strong potential to improve on health and wellbeing and improved understanding of culture and environment through tourism. The growing Mid Wales partnership must not be part of a larger region which has urban development as its core. Of the regional policies for Mid and south west Wales (only 4), only part of one policy applies to Mid Wales...*

*Regional accountability is great: let's just get the regions right. The urban areas of Swansea and Llanelli obviously belong with Cardiff and the motorway corridor. They have nothing in common with Pembrokeshire, Ceredigion or Mid Wales. Let's recognise the deprivation across rural Wales, vastly underreported, in terms of housing, employment, wages and access to healthcare (i.e. a fifty-mile journey by road to hospital in Telford, Shropshire for difficult obstetric cases in Newtown, Powys.) The problems in these rural areas are quite different to the challenges of urban enclaves.*

Some felt that the NDF gives too little consideration to rural communities, or pays too much attention to urban areas and communities in its plans. There was concern about a lack of detail on rural areas and how they will be supported for growth. This perceived imbalance made some feel that the NDF would result in inequality (e.g. economic, political) between urban and rural areas.

*Need to differentiate between rural and urban areas as these have very different needs. Disagree strongly with the joining of Powys with the urban areas of Swansea and Llanelli – to combine these areas will inevitably mean that resources are concentrated on the urban area and it will be difficult to fully and properly address rural issues.*

*A separate policy relating to rural areas would also be appropriate, outlining how these can be supported to meet their needs in terms of housing, access to services, sustainable transport and digital infrastructure.*

*I agree that development should be centred on Newport and Cardiff and Heads of Valleys area in the South East Wales region to co-locate jobs and homes. However, it would be helpful if the Welsh Government in its policies and grants could support the type of endeavours most suitable to rural economies such as the growth of the tourism industry and better broadband connections in Monmouthshire, so that more people can work at home instead of commuting long distances to work.*

As part of this, two respondents felt that certain areas of mid-Wales had unacknowledged potential for technological innovation and, in some instances, that this would be overlooked if it were part of a larger region.

*There is little commonality of interest between the Mid Wales region and the south west Wales region and Mid Wales should be given separate status as an independent region in order to shape an alternative model of rural sustainability founded on its quality environment, strong potential for technological innovation through collaborations between the public sector and the Universities, strong potential to improve on health and wellbeing and improved understanding of culture and environment through tourism. The growing Mid Wales partnership must not be part of a larger region which has urban development as its core. Of the regional policies for Mid and south west Wales (only 4), only part of one policy applies to Mid Wales...*

*Given that renewable energy technologies are now becoming cheaper than fossil fuels, the Haven Waterway should be designated as a hub for renewable energy research and development, in order to ensure that it has a sustainable post-oil/LPG future.*

Other responses focused on the South East Wales region where a variety of concerns were expressed. While some supported plans for the Cardiff area, others had concerns that the NDF places too much emphasis on Cardiff which tends to get all the funding. This reinforces concerns over a rural-urban divide. However, there were others who said that Cardiff still has capacity for sustainable growth and questioned the assumption that Cardiff is at capacity.

Away from Cardiff, there was support for policies and plans around Newport although it was also suggested that the NDF lacked detail on the planned new growth/regeneration of Newport. Some said that, in these policies, the role of brownfield sites around Newport needed reviewing as they were not sufficient to meet housing development plans and

greenfield extensions might be required. Some felt that development in the South East Wales region should be focussed around the M4 corridor.

There was also some discussion of the North Wales region. Some people agreed with the proposed policy for the North Wales region, thinking it was a good idea. These included comments supporting development in North Wales in general, focussing development along the coastal arc, making North Wales a centre for new energy development and investment, and a couple of comments supporting investment in Holyhead port.

*Furthermore, it states that investment to the port's capacity to accommodate cruise ships is supported. We support this policy as it recognises the importance of Holyhead Port within the region and its potential for future expansion.*

Others said that in North Wales, the NDF focussed growth to north-east Wales and that growth shouldn't be restricted to that area.

*Strengthening transport links to North West England is vital for the whole of North Wales and it is important that this policy is not simply about improving links from Wrexham and Deeside with improved service levels on the Wrexham-Bidston line. The North Wales coast line is far more important as it connects most of North Wales, including Holyhead, to Manchester, Manchester Airport, and to Crewe and beyond. There appears to be no mention of connecting North Wales to HS2 or Northern Powerhouse Rail. This is a significant omission. Some of the issues affecting connectivity may be outside of Wales, such as capacity on the rail network at Chester, and even as far as the Castlefield Corridor in Manchester. If needed, it benefits North Wales if Welsh money is spent on infrastructure in England. The document mentions the ongoing pinch point schemes on the A55 but doesn't mention the Deeside Corridor/Ewloe Interchange which, from a commuter's perspective, is a far more important scheme.*

Issues of transport infrastructure were raised for all regions, but with a large focus on South East Wales. There was support for existing transport policies from some while some suggested the policies lacked detail. Within the South East Wales region there was concern about the existing transport infrastructure including the need to address issues on the M4 (especially the question of a relief road). Some were concerned about the impact of the NDF on transport infrastructure with a feeling that the infrastructure was insufficient to meet increased developments such as Cardiff Airport. Others suggested the need for a greater policy focus on low carbon transport and public transport, especially when considering new developments. Some of these comments sought clarity on the exact nature of, or wanted specific details about, the proposals for a Metro.

*There is in-principle support for development and growth focussed around existing and committed railway and Metro stations. However, the policy should additionally recognise that development around other sustainable transport nodes (such as bus stops with sufficient frequency and range of services) can also deliver transit-orientated development. The policy should also clearly recognise that it is not just about providing housing close to railways/Metro links but also encouraging development around other existing urban areas with opportunities to reduce the need for residents to travel to work and access services. By allowing an appropriate level of growth around existing urban areas (housing and employment), it will help create a*

*'critical mass' of population to encourage businesses/services/public transport etc to locate in that town – a more sustainable pattern of growth and a public transport network at local and regional/national scales in the longer term.*

*There is uncertainty over the precise nature of the metro proposals which are likely to evolve over time, and it is not yet known when the scheme will be delivered. In the meantime, there is already growing need for housing development in the region, while there are sites that are suitable for development that are not necessarily in close proximity to the intended Metro routes. As such, development should not be delayed by stringently focusing on alignment with possible future metro routes.*

Across all regions, there were some who felt that their locality was being ignored or given no voice. These feelings were particularly voiced about mid-Wales and South East Wales. Some felt that the NDF's policies were too general and that it needed more policies focussed on specific areas (e.g. towns; local authorities) such as Welshpool, Powys, Cardiff and Barry. Others felt that the NDF had missed out their area as being a centre of importance. One area in particular which came up repeatedly as somewhere which should be considered as a Regional Growth Area was Holyhead. Another example was where Pembrokeshire was singled out as an area which was missing a specific energy policy.

*We are very concerned that Holyhead and surrounding area has not been identified as a Regional Growth Area. Holyhead is ideally placed to exploit the opportunities afforded by the development of offshore wind energy and tidal energy, as well as to build upon the existing port infrastructure. A rejuvenated Holyhead will have knock-on effects across the island.*

*Its location makes Holyhead an obvious potential Regional Growth Area. It seems perverse that Carmarthen, Llandrindod Wells, Newtown, Aberystwyth and the four Haven Towns are acknowledged as regional centres but Holyhead is not*

*Why is Holyhead not a 'Regional Growth Centre'? Holyhead's connections by road, train, port and air (within a reasonably close distance) means that there are opportunities for Holyhead to be a 'Regional Growth Centre'. Similar settlements in other parts of Wales, such as Milford Haven and Pembroke are identified as Regional Growth Centres. It is considered that Holyhead merits the same status.*

*There is no equivalent to policy 22 (NW Wales and Energy) for Pembrokeshire – even though the Haven Waterway is the UK's biggest energy port with a £60m + City Deal renewable energy project and the possibility of a major hydrogen project. The map for NW Wales indicates an 'Anglesey Energy Island' and also shows 'Anglesey Airport'. The Board agree with PCC and would like to see something closer to policy 22 for Pembrokeshire, focusing on the Haven Waterway as an energy port and with the related map showing an 'Energy' icon for the Haven Waterway and also identifying the Airport at Haverfordwest (Withybush), which is situated within the Haven Waterway Enterprise Zone boundary.*

Issues around greenbelts were also raised. There was some suggestion that the location of greenbelt is unclear in the NDF. Others said the policy on greenbelt should be reworded.

Some people were in support of having areas designated as greenbelt

*Green belts are a good idea and could be planted with wild flowers etc to encourage insects, thereby feeding birds etc.*

*I strongly support policies 30 and 31 in particular and that it is recognised that growth should be focussed around public transport and existing centres, and that our valuable rural landscape should be protected with a long overdue green belt.*

Others disagreed with greenbelts in Wales as they would restrict tourism; development; the economy; infrastructure; or housing. Some suggested that greenbelt proposals weren't backed by evidence. Others said that greenbelt overlaps with growth areas. In South East Wales alternative suggestions for greenbelt were made.

*Wales does not need greenbelts, it needs greater investment opportunities so it does not fall further behind the rest of UK. The WG are focusing too heavily on protecting the environment rather than creating sustainable communities through investment and development.*

*It is noted that document states that the Strategic Development Plan must identify a green belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff. We welcome this policy; however, consideration should be given to move the southern boundary north to cover the heart of Monmouthshire area only.*

*The NDF seems to be focusing on forcing development to all take place in the Valleys but not all people want to live or work in the Valleys. There is no need for a greenbelt north of the M4. Development should be allowed in this area.*

*The Green Belt as proposed contradicts the growth and spatial options preferred by Monmouthshire and also severely curtails the opportunity for the City Region to capture growth.*

There were some issues over the objectives of the NDF. Some said the plans were too general and lacked detail or need to be more action oriented. Examples of detail that should be included were: flood risk; detail on waste management; detail on minerals/mineral extraction; detail on the Welsh language; detail on tackling inequality; detail on the economy; protection of cultural/historical/heritage assets; and consideration of gypsy and traveller needs. Other respondents had issues with the maps suggesting that they were inadequate for decision making and needed more detail or said that the provision of other maps might have been helpful (e.g. a population map).

*Information provided on the national map are omitted from the regional maps, most noticeably protected landscape (National Parks and AONBs). The regional maps should include not only the information on the national map but provide additional regional context. Additional detail is necessary to accurately reflect the extent of regional growth centres, which may be best represented by inset maps.*

Other concerns were that the plans were contradictory; a common example of this was Cardiff Airport which respondents said contradicted sustainability proposals in the NDF.

*Growth and development of Cardiff airport is in contradiction to the decarbonising and sustainable objectives outlined in this document.*

Another example was that the development of Holyhead as a cruise port does not align with broader sustainability proposals. As with other policies in the NDF, there were suggestions

that there needed to be more explicit alignment between the NDF and the Welsh National Marine Plan. There was also a suggestion that plans needed a more economic focus.

A final, but important key theme is where issues were raised over the relationship of the NDF to SDPs and LDPs with this relationship needing clarification. For example, comments were made that the NDF figures and predictions do not always match those in SDPs and LDPs.

*The NDF makes it clear that the green belt will be put in place (and boundaries finalised) via the SDP. There is a query therefore as to whether it exists just because it is in the NDF and, if so, what status it can have if it is not fully defined and justified. Why therefore should an SDP inherit the requirement to designate a green belt.*

*However, given how specific the preceding chapters and policies are about spatial choices, locations for growth and numbers (for housing at least), and given what comes later in the regional sections, this policy could imply more freedom for SDPs than it actually delivers. The SDPs will all be prepared in the context of this version of the NDF, although the prospect of a 5 year review does raise some questions about the NDFs relationship to the SDP process. The SE Wales SDP, for example, is programmed for adoption in 2024/25 (at about the time of the first review of the NDF). These concerns and the role of the NDF (before SDPs are in place) are not tackled in the Development Plans Manual which was recently consulted on.*

Related to this were broader concerns, discussed elsewhere in this report, about the NDF undermining local democracy and decision-making. Some felt that not enough weight was being given to pre-existing SDPs and LDPs. There are associated feelings that local representatives, local bodies and local knowledge are being ignored by an increasingly centralised Welsh Government and its planning system. These fears, for many, are enshrined in the NDF. These fears run across many of the themes, including the designation of regions and in growing and deepening fears of a rural-urban divide that favours urban South East Wales and, to a lesser extent, Swansea, while stifling the economy and growth of rural Mid and South West Wales and North Wales.

*It sounds a sensible policy however I am concerned that it will impact upon local democracy and that attention will be focused more upon Cardiff and Newport with the needs of other small towns becoming secondary and subservient to the Cardiff and Newport centric thinking.*

*With Local Development plans originating from Swansea is a further erosion of local democracy.*

There were some other issues raised not all of which were focused on the three region model. These included: consideration should be given to alternative forms of energy generation; the need for greater collaboration between border counties/areas; visual impact of wind turbines; and the speed and environmental damage of house building.

#### **Easy-read Questions 5, 6, and 7**

4.7.11 Easy-read questions 5, 6 and 7 deal with North Wales, Mid and West Wales and South East Wales respectively.

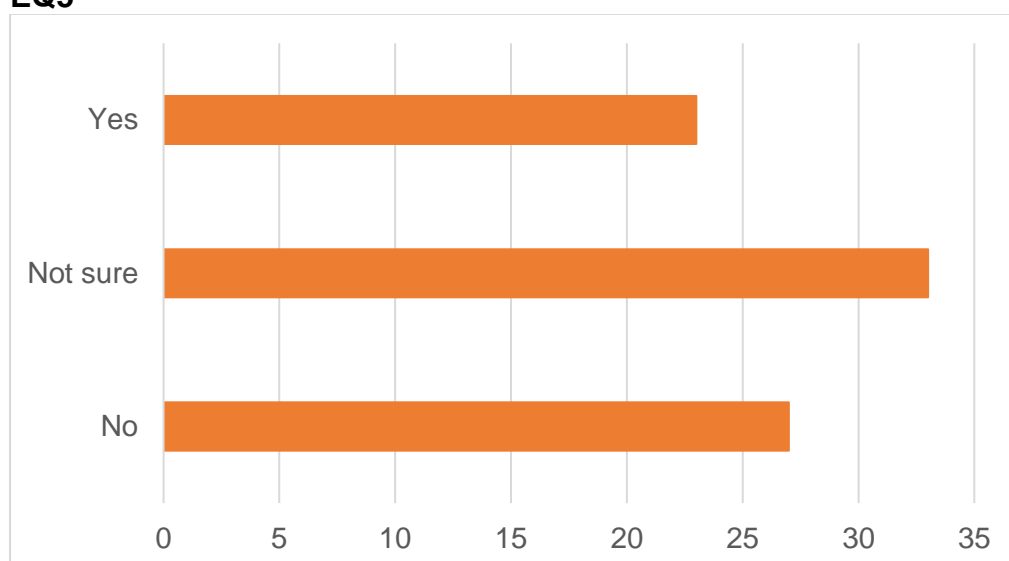
### Question 5 – North Wales

Q.5 Do you agree with our plans for North Wales?

### Easy-read Question 5 - Statistics

4.7.12 Chart EQ.5 shows the numbers of respondents agreeing or disagreeing with question Q.5. The associated tables shows the exact number and percentage of respondents expressing a view.

#### EQ5



	Yes	Not Sure	No	Total
Number	23	33	27	83
Percentage	28	40	33	100

### Question 5 – Main Themes

4.7.13 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment. It covers question 5.

Theme	Code	Count
<b>Economy/tourism</b>	Plans will result in negative impacts to the economy or tourism industry	<b>6</b>
<b>General opposition</b>	Generally disagree with proposals for North Wales	<b>5</b>
<b>North Wales region</b>	Concern of impact on Anglesey	<b>5</b>
<b>North Wales region</b>	Disagree with proposed policies for the regions/think it isn't a good approach	<b>3</b>



<b>Alternative geography/split of regions suggested</b>	Should be four regions/depends on boundaries/there are differences between north-east and north-west Wales	<b>3</b>
<b>Wind/solar developments</b>	Concerned about visual impact/ turbines will be too large/introduce buffer zones to reduce visual impact/tourism will be discouraged	<b>3</b>
<b>North Wales region</b>	Agree with proposed policies for the regions/think it is a good approach	<b>2</b>
<b>Alternative energy provision</b>	Government should consider offshore wind farms or tidal power/biomass/nuclear power	<b>2</b>
<b>General support</b>	Generally agree with proposals for North Wales	<b>1</b>
<b>Local democracy/ decision making</b>	Plans oppose local decision making/want local consultation and decision making/ability to object to new wind developments/to object on grounds of impact to landscape	<b>1</b>
<b>Transport</b>	Good transport links vital for economy/tourism/active travel/need to improve transport	<b>1</b>
<i>Other (unspecified)</i>		<b>2</b>

### Question 5 – Commentary

4.7.14 The following section is a more detailed commentary on concerns expressed by respondents. It also includes selected quotes from respondents, presented in italic, reinforcing those views.

When specifically asked about North Wales, 24 people responded with concerns about the impact to the economy or tourism, in particular in Anglesey.

*North Wales needs state-of-the-art hospitals and proper support for its important industries of agriculture and tourism. It doesn't need huge tracts of Denbighshire and the whole interior of Anglesey obliterated by solar and windfarms (visible from Snowden) which can only wipe out tourism and small local businesses and cause people to leave the region in search of work and a decent quality of life.*

*The building of Wind Turbines on Anglesey is totally at odds with the role of the island as a tourist destination and an area of AONB.*

Almost all of these concerns related to wind farms, and nearly all concerns about the impact to Anglesey were explicitly wind farm related.

When suggesting alternative geographical boundaries or splits for the regions, respondents pointed out that there were differences between north-east and north-west Wales, or that there should be four regions. Another comment indicated they were unclear where the boundary lay but opposed any part of north Powys being included in the North Wales region.

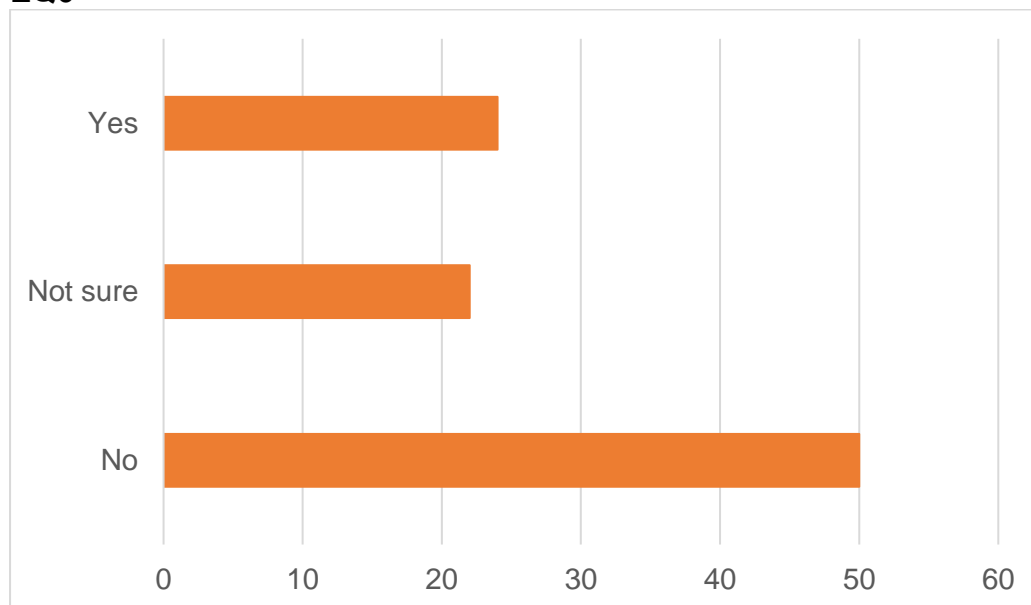
### Question 6 - Mid and South West Wales

Q.6 Do you agree with our plans for Mid and South West Wales?

### Easy-read Question 6 - Statistics

4.7.15 Chart EQ.6 show the numbers of respondents agreeing or disagreeing with question Q.6. The associated tables shows the exact number and percentage of respondents expressing a view.

**EQ6**



	Yes	Not Sure	No	Total
Number	24	22	50	96
Percentage	25	23	52	100

**Easy-read Question 6 – Main Themes – Mid and South West Wales**

4.7.16 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment. It covers easy read question 6.

Theme	Code	Count
<b>Wind/solar developments</b>	Ecological impacts/environmental damage/damage to countryside	<b>19</b>
<b>Mid and South West Wales region</b>	Plans will negatively affect mid-Wales/mid-Wales has been ignored	<b>13</b>
<b>Tourism/economy</b>	Plans will negatively affect tourism and business in the area	<b>13</b>
<b>Alternative geography/split of regions suggested</b>	Disagree with grouping of rural mid-Wales and Swansea/rural mid-Wales communities should be considered as a separate entity	<b>8</b>
<b>Alternative energy provision</b>	Government should consider offshore wind farms or tidal power/biomass/nuclear power	<b>6</b>
<b>Mid and South West Wales region</b>	Disagree with grouping of rural Mid Wales and Swansea/rural Mid Wales communities should be considered as a separate entity	<b>4</b>

<b>Energy transportation</b>	Concern about how to connect rural wind/solar farms to the national grid/infrastructure necessary to transport the energy	<b>4</b>
<b>Local democracy/ decision making</b>	Plans oppose local decision making/want local consultation and decision making/ability to object to new wind developments/to object on grounds of impact to landscape	<b>3</b>
<b>Further details required</b>	Want more specific proposals/to know how the NDF affects RSPs	<b>3</b>
<b>Wind/solar developments</b>	Reduce size, number or area of wind/solar development	<b>3</b>
<b>Local decision making</b>	Plans oppose local decision making/want local consultation and decision making/ability to object to new wind developments/to object on grounds of impact to landscape	<b>3</b>
<b>Wind/solar developments</b>	Impact to health/wellbeing	<b>2</b>
<b>Plans lack detail</b>	Too broad/need to be more action orientated/measurable/generally lack detail or clarity	<b>2</b>
<b>General opposition</b>	Generally disagree with proposals	<b>1</b>
<i>Other (unspecified)</i>		<b>2</b>

### Easy-read Question 6 – Commentary

4.7.17 The following section provides an easy-read commentary on concerns expressed by respondents. It also includes selected quotes, presented in italic, reinforcing those views.

42 respondents gave comments about the plans for Mid and South West Wales. These most commonly focussed on the ecological impacts of wind turbines on mid-Wales, but also raised concerns about the impacts to tourism in rural communities, how energy produced in rural mid-Wales would be connected to the grid and the level of infrastructure development necessary for this. There were also a small number of comments about the impacts of wind turbines on health and wellbeing.

*The grid connection in mid wales is poor, to get power from turbines and solar farms there then send to south wales will require an enormous amount of cabling or pylons. These types of green energy are intermittent and can't be stored easily.*

*I think the benefits don't out way they cost of renewing out beautiful land scape. Great scenery is mid Wales' biggest asset*

Other comments conveyed a feeling that mid-Wales (with Powys being mentioned in particular) had been ignored, forgotten about or would be used for the benefit of other regions, e.g. as an area used for the supply of energy for the rest of Wales.

*Mid wales should be considered separately, but as always, we are the forgotten area of Wales*

*This area appears to be the dumping ground for large scale renewable energy projects [...] In Powys, the plan to grow Llandrindod Wells and Newtown appears to be thrown in to appease the residents. For the people of Mid Wales, the NDF paves the way to the destruction of communities in the area.*

As was expressed elsewhere throughout the consultation responses, respondents felt that not enough weight had been given to tourism in mid-Wales and the impact that wind turbines would have to these industries and the local economy.

Suggestions for alternative regional arrangements highlighted, as they had in the main consultation questionnaire, the differences between rural mid-Wales and Swansea, and argued that these shouldn't be grouped into a single region.

*The area you have marked as Mid Wales is not really Mid Wales. I have never heard of Swansea described as being in Mid Wales. Mid Wales being comprised of Powys and Ceredigion[...]*

*There is no "Mid and South West Wales". Swansea and Llanelli have needs and aspirations absolutely in conflict with those of the great rural heartlands of Powys. How can the two be bundled together?*

*There should be a mid Wales area separate from SW Wales*

*These areas are so vast and completely different in their geography and demographic that it seems nonsensical to group them together*

*Firstly, this cannot be regarded as a region as the Framework lumps a City Region in with two distinct and predominantly rural regions. In addition, Mid Wales has little connectivity with South West Wales as demonstrated in the document...*

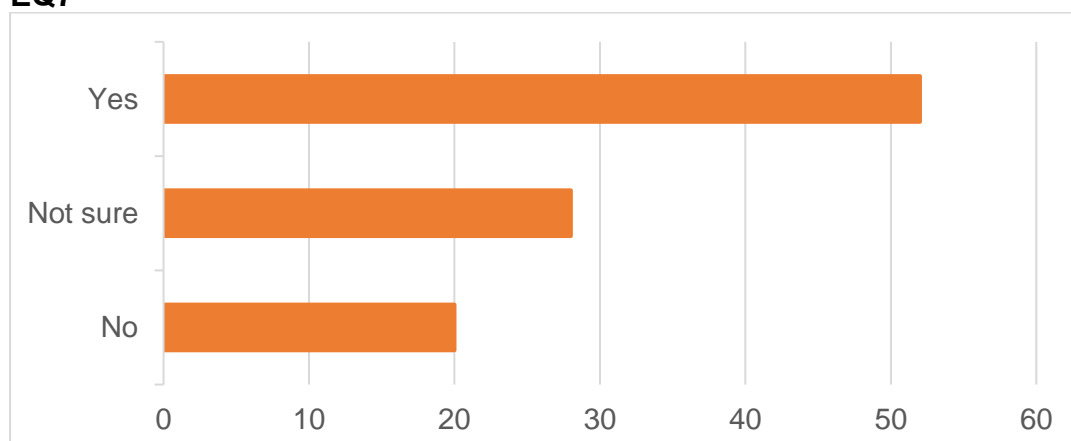
### Easy-read Question 7 – South East Wales

Q.7 Do you agree with our plans for South East Wales?

### Easy-read Question 7 - Statistics

4.7.18 Chart EQ.7 shows the numbers and extent of which respondents agree or disagree with the question. The associated tables shows the exact number and percentage of respondents expressing a view. It covers easy-read question 7.

#### EQ7



	Yes	Not Sure	No	Total
Number	52	28	20	100
Percentage	52	28	20	100

### Question 7 – Main Consultation Themes

4.7.19 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment. It covers easy-read question 7.

Theme	Code	Count
<b>Generally oppose</b>	Disagree with the regional split/too much focus on the South East	<b>6</b>
<b>Generally oppose</b>	Generally disagree with proposals	<b>5</b>
<b>Concerns about wind turbines</b>	Ecological impacts/environmental damage/damage to countryside	<b>3</b>
<b>Alternative energy provision</b>	Government should consider offshore wind farms or tidal power/biomass/nuclear power	<b>3</b>
<b>South East Wales region</b>	Concern with impact to transport infrastructure/transport infrastructure insufficient for increased developments e.g. Cardiff Airport	<b>2</b>
<b>Mid and South West Wales region</b>	Disagree with grouping of rural mid-Wales and Swansea/rural mid-Wales communities should be considered as a separate entity	<b>1</b>
<b>Further details required</b>	Want more specific proposals	<b>1</b>
<b>Wind/solar developments</b>	Reduce size, number or area of wind/solar development	<b>1</b>
<i>Other (unspecified)</i>		<b>3</b>

### Easy-read Question 7 – Commentary

14 respondents gave comments, most frequently to suggest that there was too great a focus on the South East Wales region, with this region receiving the majority of the benefits of the plans.

*Well you are only interested in South Wales aren't you.*

*There is an undue emphasis on South East Wales at the expense of the rest of the country. More should be spent on developing fast broadband access across the whole nation to strengthen rural entrepreneurship and employment.*

*This area seems to have got away without providing any renewable energy, but with the growth planned will consume much more energy.*

Similar concerns to those seen elsewhere were raised about the ecological, environmental and landscape damage of wind turbines, and suggestions for offshore and tidal energy.

Other comments specific to the South East Wales region regarded transport infrastructure, opposing airport expansion, and developing to encourage public transportation use and active travel.

## Written Submissions

4.7.20 The following consultation responses were provided as a written submission and did not use either a full or easy-read questionnaire.

### Greenbelts

The proposals for greenbelts designation were supported by some submissions from the perspective of protecting wildlife and agricultural land from development. Julie Morgan AM also welcomed the plans and pointed to significant support from petitions for a greenbelt in South East Wales and pointed to the area north of the M4, including both sides of Caerphilly Mountain, being designated as a Green Wedge with protection until 2026 (in the Local Development Plans for Cardiff and Caerphilly).

There was also a call to extend the proposed greenbelt in the South East to ridge line around north Cardiff across the Taff Valley to extend across Garth mountain area and west Cardiff due to it being an “*extremely distinctive setting to the City*”. Meanwhile, RCPT suggested it extend from Caerphilly Mountain in the north to the M4 and include the Ruperra Estate and historic parkland, as well as Coed Craig Ruperra, as evidenced by Caerphilly Sustainable Landscape Masterplan and Agricultural land classification and “*the fact that it has no significant physical infrastructure*”.

However, Powells Chartered Surveyors suggested greenbelt designation would conflict without Monmouthshire’s LDP and place economically damaging restrictions to rural growth and the ability of rural businesses to diversify. They also gave examples of where greenbelt designated land had to subsequently be released due to it being too restrictive on development.

*We, as a firm, undertake development work and planning consultancy in a number of counties both in England and Wales. We are finding that in our recent experience of dealing with the greenbelts in the Gloucester, Cheltenham and Tewkesbury under the Joint Core Strategy area, there has been a significant release of greenbelt in and around Cheltenham and Gloucester principally because greenbelt has been far too restrictive over the previous 40 years or so. The restriction has only led to a significant undersupply of housing which in turn has led to a much more significant release of greenbelt then later on a disproportionate level. If the greenbelt policy had been absent, there is an argument to say smaller scale development could have taken place on a more organic basis over the period of years rather than it all being clumped together within one plan period to satisfy objectively assessed and identified need.*

**Powells Chartered Surveyors**

Others suggested that there appeared to be an overlap between areas of growth and green belts on the NDF maps, which was described as a contradictory.

*RCPT strongly supports the proposal for a Green Belt to the north of Cardiff. However, we suggest that it is defined more clearly without overlapping an Area of Growth (which appears contradictory).*

**RCPT**

## **Mid Wales**

While concerns about wind developments were mentioned generally, comments specifically referenced the impact to Mid Wales in terms of the impact tourism. The tourism industry in Mid Wales was seen as reliant on the natural environment and therefore tourism would be discouraged by the visual effect of turbines and their associated infrastructure. One submission highlighted that the plans do not detail how regional income loss from the effect on tourism would be mitigated e.g. by sharing income from wind/solar developments.

Additionally, the peat bogs, dark soils, and woodland of Mid Wales were perceived as vulnerable to degradation from the construction of wind turbines, thus going against environmental principles.

*The Mid Wales landscapes already have significant windfarm development; yet upland areas where windfarms and their infrastructure are not installed provide significant carbon storage not only in peat but its dark soils and woodlands. Potential for further sequestration is a significant part of the strategic planning of the environmental and agricultural sectors*

### **Conservation of Upland Powys**

Outward migration was an ongoing concern for the area, with some suggesting greater development for business growth was necessary to prevent skills and young people from leaving the area.

*It is also noted that whilst development is planned for North Wales and South Wales there are no plans to encourage business development in Mid Wales. We need more Business parks to enable local Businesses to grow and so help to retain our young people and associated skills.*

### **Llandysilio Community Council**

Several submissions from North Wales wanted greater clarity on the role of nuclear energy for the future of Wales' energy provision, with some suggesting that this was an effective low carbon option in the context of the declared climate emergency. Conversely, several objected to nuclear being considered at all as an energy source and 'swapping carbon emissions for nuclear waste', while others said it was unclear the extent to which the NDF supported future nuclear developments or specifically whether a small modular reactor at Trawsfynydd would be determined at Welsh or UK government level and whether it would be treated Development of National Significance' (DNS) determined by the Welsh Government or a 'Nationally Significant Infrastructure Project (NSIP) determined by the UK Government.

In addition to the Priority Areas, there was also objection to the designation of a Mid and South West Wales region. This reflects responses outlined elsewhere in this report. It was felt that the evidence for this designation was poor and the region itself problematic. Some felt that Swansea would dominate within this set up, drawing resources away from rural mid-Wales.

*[Respondent states that Swansea is better included with Cardiff region] It is clear that Swansea has been arbitrarily appended to mid Wales in order to create of this enormous rural area an urban loading, with urban priorities sucking the lifeblood out of rural areas, so leaving the latter a Cinderella in a quasi-apartheid system. The purpose of this appalling gerrymandering of mid Wales (whose natural connections are east west into large parts of Gwynedd and in England, Shropshire and Hereford) is glaringly apparent.*

*The NDF proposal of three planning regions for Wales based on Cardiff, Swansea and Wrexham is unacceptable. A “spatial strategy” for Mid and South West Wales (See map on draft NDF page 25) which lumps Tenby and Welshpool together and suggests that Swansea can be in any sense a “regional centre” or “focal point” for planners in Montgomeryshire is seriously deluded.*

Others felt that this “super-region” would undermine the voices of those in rural mid-Wales. There was a general feeling that the Mid and South West Wales was being seen as a homogenous area, failing to address local perceptions and issues. The final respondent quoted above illustrated how they perceived the region to be meaningless by pointing out that:

*Here in Llansantffraid we are closer in distance to Lancaster or Nottingham than to Swansea and much closer to both in travelling time. Nobody with whom we discussed the “three regions” proposal could see any merit in it. Our recommendation is that Mid Wales or Powys should immediately be re-defined as a fourth Welsh planning region as previously.*

One respondent said that the NDF pays much more attention to north-east Wales with lots of north-west Wales being ignored.

There was also criticism of the maps used to illustrate both Priority Areas and regions in terms of their accuracy, the evidence behind them, the level of detail they contained and their consequent usefulness for decision making.

## **Standardised Submissions**

4.7.21 Standardised submissions are where multiple (identical) responses have been made on a particular issue.

67 individuals, two town councils and one community council in Anglesey submitted identical or near identical responses objecting to wind and solar development in Anglesey on the basis of the height and scale of turbines being too large, the possibility of using alternative energy sources, a lack of clarity or evidence base for the priority areas, and inadequate consultation.

23 standardised submissions related to the North West Wales Energy Policy (policy 22), objecting specifically to the proposed use of nuclear power. In particular, these objection were in relation to the waste products, environmental damage, cost of electricity, unproven technology, and uncertainty of the number of jobs for local people, social problems and poor experiences with other nuclear sites, link to nuclear weapons, splitting of funding for



renewable energy and contradiction with existing legislation such as the Wellbeing of Future Generations (Wales) Act.

## **Welsh Government Response – draft Policy 16: Strategic Policies for Regional Planning**

- 4.7.22 Comparatively few comments were made in relation to draft Policy 16 regarding the principle of the policy, what it requires or its wording. There is a general acceptance that it is reasonable for the NDF to provide direction for SDPs and that what the policy sets out are realistic requirements for a regional plan. The Development Plans Manual, which was consulted on in 2019, sets out advice and guidance on the preparation of SDPs and supports the NDF policy. With near 100% LDP coverage across Wales, planners are experienced in preparing development plans and capable of delivering regional plans.
- 4.7.23 Comments received both directly to this policy and to other parts of the NDF queried where SDPs were required; the relationship between national parks and SDPs; what happens in the absence of a SDP; what happens to the NDF once SDPs are adopted; the role of SDPs in dealing with cross border issues; and the relationship between SDPs and growth deals.
- 4.7.24 The supporting text has been extended to clarify the NDF's role in supporting SDPs. An explanation of how SDPs should consider cross border issues has been introduced and sets out the importance of SDPs working together, with English regions and Ireland. The role of SDPs in supporting the delivery of city region and growth deals is vital and supporting text has been added to clarify and establish this relationship. The future relationship between SDPs and the NDF is key to aligning the planning system at all levels in delivering the Welsh Government's vision for Wales. Supporting text has been added to explain how future NDFs will be informed by SDPs.
- 4.7.25 Text has also been added to clarify the relationship between the SDP and NDF Outcomes to help provide a focus for the preparation of SDPs. Finally, the supporting text has been expanded to include a much fuller overview of the NDF's regional policies and their focus on national and regional growth and managing and supporting this growth within each region.
- 4.7.26 As a result of other changes this policy will be renumbered Policy 19.

### **New Mid Wales Region and South West Region**

- 4.7.27 Draft NDF Policy 16 and the supporting text has been amended to reflect the introduction of a Mid Wales region. The originally proposed Mid and South West region has been separated to create two distinct regions, Mid Wales and South West Wales. The regional element of the NDF is now based on four regions – North, Mid Wales, South West and South East.
- 4.7.28 There were a high number of representations in relation to the proposed Mid and South West region. Responses considered the region was too large; that

there was no functional relationship between places such as Welshpool and Tenby which are over 100 miles apart; that it would be impossible to prepare an SDP for such a large area; that the region did not reflect the aims and priorities of the established and emerging growth deals in the Swansea region and Mid Wales; that the issues across this diverse region would be too great to reconcile in a single regional approach; and that the region included the second largest urban area in Wales and the most sparsely populated and entirely different approaches would be required to address issues faced in the urban and rural areas.

4.7.29 The draft NDF acknowledged that the area was large and diverse and supported different approaches to addressing regional issues across the Mid and South West region. The three region approach was developed in accordance with the Economic Action Plan's three region approach and to support and co-ordinate economic policies with the delivery of housing, services and infrastructure.

4.7.30 It is agreed that a change to a four region approach and a defined Mid Wales region strengthens the NDF. It allows each region to be shaped around the issues it must address and set out policies that can more directly focus on the key issues. It will also ensure that the NDF's spatial geography better reflects the people of Mid Wales' views on the wider region in which they live. The Welsh Government's Regional officer for Mid & South West Wales supports this change and is similarly reviewing their approach across Mid and South West Wales. (See Welsh Government Response for new Mid Wales policies from paragraph 4.7.51)

### **Additional Mapping & Data for All Regions**

4.7.31 Comments were made across responses to different parts of the draft NDF in relation to its spatial content. There is a view that the national spatial plan should be more spatial in its presentation and that many of the issues the NDF seeks to influence, can be presented very simply in the form of maps. The CCERA committee concluded that there is scope for more exploration and better presentation of the implications of the identified challenges and opportunities for each area of Wales and that for each area, the NDF should map demographic, economic, environmental and Welsh language dimensions.

4.7.32 The infographics shown at the start of each regional chapter sought to provide an introductory overview of each region, identifying a range of spatial issues distinctive to each region. On reflection, this introductory overview would be strengthened by a more clearly defined and consistent approach to setting out spatially the key economic, social and environmental issues within each region. The infographic that introduces each region on pages 48, 55 and 61 of the draft NDF will be replaced by mapping and graphics setting out the key regional spatial characteristics.

The proposed changes address Conclusions 7, 10 and 13 from the Climate Change, Environment and Rural Affairs Committee. They also address issues 5 and 8 raised by the Economy, Infrastructure and Skills committee. See sections 5 and 6 of this report for details.

## Region – the North

### Welsh Government Response - draft Policy 17: Wrexham and Deeside

- 4.7.33 Wrexham and Deeside remains a National Growth Area, with the main features of this policy retained. The wording of this policy, and equivalent policies in other regions, has been amended to ensure greater consistency across different parts of the NDF. Some consultation responses queried why there were differences in wording between the policies for the National Growth Areas and we agree that a more consistent approach can be introduced without affecting the scope of the policy. As part of introducing greater consistency, the policy will be renamed “*National Growth Area - Wrexham and Deeside*”, and as a result of other changes it will be renumbered as Policy 20.
- 4.7.34 The consultation raised few significant concerns in relation to this policy, with its aims broadly accepted. The justification for identifying Wrexham and Deeside as a National Growth Area is set out in the [NDF Explanatory Paper on the Spatial Strategy](#).
- 4.7.35 Some of the key places in the National Growth Area are listed in the supporting text. This list and the strategic map should guide proposals in Strategic and Local Development Plans but it is not a definitive list. Local planning authorities in the region should develop suitable policies and identify appropriate sites for development to support the aims of this policy.

### Welsh Government Response - draft Policy 18: North Wales Coastal Settlements

- 4.7.36 The series of large towns along the north coast remain identified as Regional Growth Areas. A significant change to this policy is the introduction of Holyhead, which a number of consultation responses identified as having an important role as a retail, commercial and service centre. The draft NDF recognised the importance of the Port of Holyhead but did not provide a clear statement regarding the importance of the town itself. This amended policy should ensure appropriate opportunities for growth and development are identified in Strategic and Local Development Plans.
- 4.7.37 The wording of this policy, and equivalent policies in other regions, has been amended to ensure greater consistency across different parts of the NDF. Some consultation responses queried why there were differences in wording between the policies for the Regional Growth Areas and we agree that a more consistent approach can be introduced without affecting the scope of the policy. As part of introducing greater consistency, the policy will be renamed “*Regional Growth Area – North Wales Coastal Settlements*”, and as a result of other changes it will be renumbered as Policy 21.

## Welsh Government Response - draft Policy 19: Green Belts in North Wales

- 4.7.38 There were a number of comments raised in relation to the proposed green belts for North and South East Wales. Respondents questioned the evidence for identifying the areas; the potential for green belts to restrict development; the potential for a green belts to restrict development that could be achieved based on strong cross border markets; the Welsh Government's position in determining a green belt was required and removing the decision from the regional tier better suited to evidencing, engaging, identifying and establishing a green belt; whether the Welsh Government had misunderstood the purpose of green belts; that green belts would restrict the rural economy; that there was no evidenced need for green belts; and that there is an inconsistent approach between the policies in the North and South East.
- 4.7.39 The green belts are an essential element of the NDF's Spatial Strategy. They are intended to focus development in the National Growth Areas which are the most appropriate locations for strategic, sustainable growth. The Spatial Strategy Explanatory paper (<https://gov.wales/sites/default/files/publications/2020-01/ndf-explanatory-paper-the-spatial-strategy.pdf>) explains the rationale for the green belts.
- 4.7.40 Planning Policy Wales sets out the national policy context for green belts. It explains that in establishing the green belt, a sufficient range of development land should be made available, having regard to the longer term need for development land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. In identifying a green belt, land may be safeguarded for future development and boundaries of proposed green belts must be carefully defined to achieve this. The process of preparing SDPs and defining green belts is therefore able to consider the long term growth requirements of a region, including at settlements within or near the indicative green belt areas shown on the North and South East spatial strategy maps. It is not accepted that green belts will bluntly restrict growth but rather that green belts should be considered through a formal statutory process which is able to consider growth across the full region to maximise sustainable development and regeneration; establish settlement hierarchies and the locations for strategic regional growth in the context of the NDF; and determine the appropriate regional response to development pressures outside of the region.
- 4.7.41 To avoid uncertainty on what should happen in the indicative green belt areas shown on the North and South East spatial strategy maps in advance of the adoption of SDPs, changes will be made to this policy to make clear that LDPs and development management decisions should not permit major development in these areas until the publication of the respective SDPs.
- 4.7.42 The comments on inconsistency between the North and South East region policies are accepted and greater consistency will be introduced. As a result of other changes this policy will be renumbered Policy 22.

## **Welsh Government Response - draft Policy 20: Port of Holyhead**

- 4.7.43 The NDF has been significantly updated in response to consultation responses relating to transport issues. Chapter 4, which covers the national strategic matters, has been expanded with three additional policies on International, National and Regional Connectivity.
- 4.7.44 Holyhead Port has been identified as a Strategic Gateway under the proposed International Connectivity policy (proposed Policy 10). This is to recognise its international connections, scale and the role it plays within the economy of Wales and the region. Although it has an important role within the local and regional economy, it is also a major national asset which provides an important international gateway for freight and passengers. It is major conduit for imports and exports and key transport infrastructure between land and sea providing international connectivity for Wales and the UK.

## **Welsh Government Response - draft Policy 21: Transport links to north west England**

- 4.7.45 A number of responses expressed concern regarding a lack of detail on the Metro proposals which will have a significant influence over future development locations. Some responses also considered there needed to be greater policy focus on public transport in general and opportunities not associated with the individual Metro proposals.
- 4.7.46 The NDF has been significantly updated in response to consultation responses relating to transport issues. Chapter 4, which covers the national strategic matters, has been expanded with additional policies on International National and Regional Connectivity (proposed Policies 10,11 & 12). These proposed policies provide a greater focus on active travel, public transport and reducing the use and ownership of private vehicles. These are fundamental principles in Planning Policy Wales and have been reflected in the updated NDF.
- 4.7.47 The National and Regional Connectivity policies now set out the strategic approach to connectivity and how the Welsh Government will support and invest in improvements to active travel and public transport. The draft regional transport policies (draft Policies 21, 26 and 31) have been amended to focus on specific Metro proposal with an emphasis on improving connectivity within their respective regions and neighbouring regions. The policies set direction and provide support for the consideration of the detailed Metro proposals to ensure associated benefits are maximised. As part of introducing greater consistency, the policy will be renamed "*North Wales Metro*". As a result of other changes it will be renumbered as Policy 23.

## Welsh Government Response - draft Policy 22: North West Wales and Energy

- 4.7.48 The Welsh Government recognises the strong feelings that some have towards the generation of nuclear power, and that which is generated in Wales in particular. However it also recognises the economic benefits which these developments also help to bring to the area and the opportunities which existing nuclear sites have to bring prosperity to this region. As a result of other changes this policy will become Policy 24.
- 4.7.49 It is recognised that the policy needed to be more specific around the projects which the Welsh Government is supporting and so references to Anglesey Energy Island Programme, Wylfa Newydd and Trawsfynydd have been included. The Trawsfynydd site is located with the Snowdonia National Park. At the detailed planning stage, it will be necessary to consider design and impact upon the environment and landscape of the National Park including potential mitigation.
- 4.7.50 Through representations on the renewable energy policies it is also become clear that Welsh Government support for the onshore elements of offshore renewable energy development should be consolidated through the NDF. The policy has now been amended to reflect this position.

The proposed changes address Conclusions 31 and 50 from the Climate Change, Environment and Rural Affairs Committee. They also address issues 4 and 6 raised by the Economy, Infrastructure and Skills committee. See sections 5 and 6 of this report for details.

## Revised Region - Mid Wales

### \* New proposed Policy 25 - Mid Wales Regional Growth Areas

4.7.51 The scope of the strategic spatial policy for Mid Wales is defined by the national strategic spatial policy – proposed Policy 1: ‘Where Wales will grow’. This identifies Mid Wales as having Regional Growth Areas. This reflects the size of the towns and the population distribution in Mid Wales. By identifying Mid Wales as a region, there is an opportunity for a regional spatial strategy that is tailored to the region.

4.7.52 The proposed spatial approach is compatible with the objectives of the Growing Mid Wales Partnership. It recognises that places in the region are interlinked and inter-dependent. People in the region are used to needing to use different towns for different services – for example shopping in one place, using the library and leisure centre in another. The proposed policy recognises this way of life and promotes a ‘poly-centric’ approach to development in the region. Many places are part of a cluster and it will be for the Strategic and Local Development Plans to set out locations for growth and development within the identified Regional Growth Areas.

4.7.53 The proposed policy identifies a series of Regional Growth Areas:

- Aberystwyth
- Brecon and the Border
- Bro Hafren, including Welshpool and Newtown
- The Heart of Wales, including Llandrindod Wells and Builth Wells
- The Teifi Valley, including Cardigan, Newcastle Emlyn\*, Llandysul and Lampeter.

4.7.54 These areas are important places at the regional scale. They each offer public and commercial services, community facilities and employment opportunities. Public transport in the region is less developed than in more urban parts of Wales, but most services link the Regional Growth Areas and enable people in rural parts of the region to reach them.

4.7.55 The NDF does not set growth targets or housing requirements for the regions; these should be produced by local planning authorities in the preparation of Strategic and Local Development Plans, using local evidence and in collaboration with stakeholders and communities in the region. Factors such as the provision of services and facilities, accessibility and capacity should be taken into account. Some of the growth areas are in or very near National Parks and other designated areas, and it is important that these factors are also taken into consideration. The relevant local planning authorities should not consider the five named areas to be equal or to be expressed in any order.



4.7.56 There are no National Growth Areas in the region because the evidence does not suggest any part of the region is sufficiently accessible and well-served to act as central focal point for growth. Aberystwyth is the region's biggest settlement; it has a renowned university, a general hospital and a number of public services and institutions. Its coastal location in the north west of the region means however it does not function as a focal point for the whole region. For many people and communities, places like Birmingham, Cardiff, Hereford, Shrewsbury or Swansea are more natural destinations for important services.

*\*The Teifi Valley Regional Growth Area includes Newcastle Emlyn, located in Carmarthenshire in the south west region. This reflects the close functional relationship of places along the Teifi Valley. It will be important for the relevant strategic and local development plans across the regional boundary to take a coordinated approach that recognises the cross-boundary nature of this Regional Growth Area in particular*

### **\* New proposed Policy 26 – Growing the Mid Wales Economy**

4.7.57 There were a high number of representations in relation to the proposed Mid and South West region. Comments made included:

- People did not recognise the region as a functioning area;
- they considered the range of issues too diverse to be addressed in a single regional approach; they
- believed that rural issues would be lost in the context of the urban issues in the Swansea region;
- they believed that the traditional rural sectors had not been adequately identified or addressed;
- people stated that where rural issues were discussed in the NDF they were clichéd and did not recognise that rural areas of Wales and Mid Wales had the potential to support dynamic, modern, innovative enterprises;
- some suggested that the future of Wales was as much rural as it was urban;
- people said that rural areas and Mid Wales were already home to a broad range of modern, strong companies and this should be built on and strengthened;
- some said that the NDF is not the tier to address regional issues; and that significant progress has been made in Mid Wales on a regional growth deal and the draft NDF does not support this approach.

4.7.58 Some of these issues have been addressed by changes to the proposed NDF rural Policies 4 and 5. These changes are discussed elsewhere in this report (from paragraph 4.2.37 – Policy 4 and 4.2.46 for Policy 5).

4.7.59 It is agreed that the introduction of a Mid Wales region strengthens the NDF and allows it to more clearly focus on key issues such as supporting the

region's economy. The new policy recognises that future growth in Mid Wales should be based on both traditional and new sectors and that SDPs and LDPs have a key role to play in establishing the policy framework to support the region's economy. The supporting text identifies the importance of both the regional growth deal and the Regional Economic Framework and the role SDPs and LDPs will have in facilitating their delivery.

### **\* New proposed Policy 27 – Movement in Mid Wales**

- 4.7.60 Movement is a key issue for people in the Mid Wales region and this came across repeatedly in the representations. Distance between places, the need to travel within and outside the region to access jobs, schools, shops and services and the lack of frequent public transport mean that the need to travel and how people travel is a central feature of people's everyday lives. Representations recognised the importance of the private car, and whilst acknowledging the importance of public transport and other forms of travel, that for many there was little or no alternative to the car.
- 4.7.61 The introduction of a Mid Wales region strengthens the NDF and allows it to more clearly focus on key issues such as travel and movement. The new policy recognises that investment in the region's transport infrastructure can improve accessibility, support growth and help regenerate places. It identifies the important role Strategic and Local Development Plans will have in helping to deliver new transport infrastructure and managing land use to ensure that opportunities arising from improved accessibility are taken.
- 4.7.62 The supporting text recognises the English border and the wider region with large populations and England's second city, Birmingham. Joint cross border working is already underway and this is fully supported. It also recognises the role of the private car and the importance of supporting other forms of travel.

The proposed changes address Conclusion 10, 11 and 31 from the Climate Change, Environment and Rural Affairs Committee. They also address issues 6 and 8 raised by the Economy, Infrastructure and Skills committee. See sections 5 and 6 of this report for details.

## Revised Region – the South West

### Welsh Government Response - draft Policy 23: Swansea Bay and Llanelli

4.7.63 Swansea Bay and Llanelli remains a National Growth Area, with the main features of this policy retained. The wording of this policy, and equivalent policies in other regions, has been amended to ensure greater consistency across different parts of the NDF. Some consultation responses queried why there were differences in wording between the policies for the National Growth Areas and we agree that a more consistent approach can be introduced without affecting the scope of the policy. As part of introducing greater consistency, the policy will be renamed “*National Growth Area – Swansea Bay and Llanelli*”, and as a result of other changes it will be renumbered as Policy 28.

### Welsh Government Response - draft Policy 24 – Regional Centres

4.7.64 By creating separate Mid Wales and South West regions there is a need to update this policy. The places identified in the draft NDF as regionally important in the South West are retained as Regional Growth Areas. The inclusion of Pembroke as a Regional Growth Area was questioned due to concerns that growth and development could affect the historic character of the town. The special qualities of Pembroke, and the need to maintain and enhance them, are fully recognised and inclusion within Regional Growth Area should not be seen as a threat to those qualities. Strategic and Local Development Plans will be able to use Pembroke’s status as a part of the Regional Growth Area to focus on delivering enhancements to the townscape that reflect its importance as a service and tourism centre.

4.7.65 The wording of this policy, and equivalent policies in other regions, has been amended to ensure greater consistency across different parts of the NDF. Some consultation responses queried why there were differences in wording between the policies for the Regional Growth Areas and we agree that a more consistent approach can be introduced without affecting the scope of the policy. As part of introducing greater consistency, the policy will be renamed “*Regional Growth Areas – Carmarthen and the Haven Towns*”, and as a result of other changes it will be renumbered as Policy 29.

### \* Proposed New Policy 30 - Green Belts in the South West

4.7.66 Comments were made during the consultation that the absence of a green belt policy in the Mid and South West region risked creating confusion regarding the Welsh Government’s position on green belts in the region. It could be interpreted that the NDF did not wish to see a green belt in the region, that the NDF did not want a SDP in the region to consider a green belt, that the Welsh Government had no view or that the Welsh Government was supportive of a green belt. This different approach between the regions

was unequal and it was proposed that the NDF be amended to include a green belt policy in the Mid and South West region.

4.7.67 We agree with these comments. The green belts are an essential element of the NDF's Spatial Strategy. They are intended to focus development in the National Growth Areas which are the most appropriate locations for strategic, sustainable growth. The Spatial Strategy Explanatory paper (<https://gov.wales/sites/default/files/publications/2020-01/ndf-explanatory-paper-the-spatial-strategy.pdf>) explains the rationale for the green belts.

4.7.68 It is important given the National Growth Area identified in the South West region, that there is clarity on the Welsh Government's position and that a future SDP is not frustrated by uncertainty. The NDF will therefore be changed to include a policy entitled 'Green Belts in South West Wales' supporting SDPs in establishing green belts in the region.

4.7.69 Development pressures in the North East and South East arise in part from the presence of established green belts in adjoining areas of England. In these regions, the Welsh Government has identified indicative green belt areas to support the SDP process in establishing green belts and to ensure that LDPs and development management decisions do not direct major growth to these areas in advance of the SDP process considering sustainable regional growth and how wider development pressures should be managed. The development pressures around the South West National Growth Area are not driven in part by wider cross border pressures and therefore it is not considered necessary to identify an indicative green belt area in the NDF. As the new policy states, the Welsh Government is supportive of the SDP process identifying and establishing green belts within the South West.

### **Welsh Government Response - draft Policy 25: Haven Waterway**

4.7.70 Draft Policy 25 Haven Waterway will be revised to reflect the comments made and the proposed changes to the transport policies within the NDF - in particular proposed Policy 10: International Connectivity - and recognise its importance in relation to energy.

4.7.71 The proposed changes mean that the importance of Haven Waterway from a transport perspective are addressed in proposed Policy 10 which is located within the spatial strategy section of the NDF reflecting its national importance and benefits. The importance of the area for Wales' energy needs is addressed through proposed Policy 32.

4.7.72 The changes to draft Policy 25 respond to specific consultation responses with regard to reflecting Haven Waterway's importance for energy for the region, Wales and the UK. The rationale for these changes is to acknowledge the strategic role of the Waterway and its potential for the testing, development and provision of renewable energy technologies and the wider benefits this could bring to the region. The changes recognise the deep water nature of the waterway as this is recognised as providing a unique opportunity which should not be sterilised through inappropriate land uses.

4.7.73 These changes will help to deliver NDF outcomes 6 (in places where prosperity, innovation and culture are promoted) and 11 (in places which are decarbonised) as well as contribute towards the wider decarbonisation objectives of the Welsh Government.

### **Welsh Government Response - draft Policy 26: Swansea Bay Metro**

4.7.74 A number of responses expressed concern regarding a lack of detail on the Metro proposals which will have a significant influence over the future development locations. Some responses also considered there needed to be greater policy focus on public transport in general and opportunities not associated with the individual Metro proposals.

4.7.75 The NDF has been significantly updated in response to consultation responses relating to transport issues. Chapter 4, which covers the national strategic matters, has been expanded with additional policies on International, National and Regional Connectivity (proposed Policies 10, 11 and 12). The National and Regional Connectivity policies have been informed by calls for a greater focus on active travel, public transport and reducing the use and ownership of private vehicles. These are fundamental principles in Planning Policy Wales and have been reflected in the updated NDF.

4.7.76 The National and Regional Connectivity policies now set out the strategic approach to connectivity and how the Welsh Government will support and invest in improvements to active travel and public transport. The regional policies have been amended to focus on their specific Metro proposal with an emphasis on improving connectivity within their respective regions and neighbouring regions. The policies set direction and provide support for the consideration of the detailed Metro proposals to ensure associated benefits are maximised.

4.7.77 As part of introducing greater consistency, the policy will be renamed “*South West Metro*”, and as a result of other changes it will be renumbered as Policy 31.

The proposed changes address Conclusions 10, 33 and 50 from the Climate Change, Environment and Rural Affairs Committee. They also address issues 8 raised by the Economy, Infrastructure and Skills committee. See sections 5 and 6 of this report for details.

## Region – the South East

### Welsh Government Response – draft Policies 27-29

**27 – Cardiff**

**28 – Newport**

**29 – The Heads of the Valleys**

- 4.7.78 The draft NDF addressed the National Growth Area in South East Wales through three separate policies. A number of consultation responses highlighted this as inconsistent with policies in the other National Growth Areas. As a result, we are proposing to merge these policies, with some amendments and shortening of wording. The new policy will be named “*National Growth Area – Cardiff, Newport and the Valleys*”, and as a result of other changes it will be numbered Policy 33.
- 4.7.79 The amended layout does not materially change the aims of the policy from the draft NDF approach. Policy 27 on the role and status of Cardiff as the capital city was broadly supported, while the principle of Policy 28 on Newport was widely welcomed. Concerns about the deliverability of Policy 28, in relation to the immediate availability of brownfield land in Newport, did not sufficiently recognise that the NDF is a twenty-year plan and that large scale development opportunities frequently arise in urban areas. Additionally, ensuring suitable land is available for development is one of the aims behind NDF Policy 3 (draft and proposed). The consultation highlighted legitimate concerns regarding flood risk constraints in Newport and other growth areas; a new proposed policy on Flooding (see Question 15, paragraph 4.8.6) will assist in improving the resilience of potential development areas to flood risks.
- 4.7.80 Policy 29 in the draft NDF focussed on the Heads of the Valleys area, whereas the proposed policy identifies the broader Valleys area as part of the National Growth Area. This reflects the strategic map for South East Wales in the draft NDF, which shows the majority of the region as being within the growth area. The revised policy is better aligned with the strategic map and therefore should reduce the potential for confusion. The supporting text retains the content on the Heads of the Valleys and references to the Welsh Government’s ambitions for economic opportunities in the area.
- 4.7.81 The revised policy and the updated strategic diagram for the region will form the basis for spatial policies and proposals in Strategic and Local Development Plans. It will be the role of these plans to distribute growth appropriately and identify key centres of growth within the National Growth Area.

## Welsh Government Response - draft Policy 30: Green Belts in South East Wales

- 4.7.82 There were a number of comments raised in relation to the proposed green belts for North and South East Wales. Respondents questioned the evidence for identifying the areas; the potential for green belts to restrict development; the potential for a green belts to restrict development that could be achieved based on strong cross border markets; the Welsh Government's position in determining a green belt was required and removing the decision from the regional tier better suited to evidencing, engaging, identifying and establishing a green belt; whether the Welsh Government had misunderstood the purpose of green belts; that green belts would restrict the rural economy; that there was no evidenced need for green belts; and that there is an inconsistent approach between the policies in the North and South East.
- 4.7.83 The green belts are an essential element of the NDF's Spatial Strategy. They are intended to focus development in the National Growth Areas which are the most appropriate locations for strategic, sustainable growth. The Spatial Strategy Explanatory paper (<https://gov.wales/sites/default/files/publications/2020-01/ndf-explanatory-paper-the-spatial-strategy.pdf>) explains the rationale for the green belts.
- 4.7.84 PPW sets out the national policy context for green belts. It explains that in establishing the green belt, a sufficient range of development land should be made available, having regard to the longer term need for development land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. In identifying a green belt, land may be safeguarded for future development and boundaries of proposed green belts must be carefully defined to achieve this. The process of preparing SDPs and defining green belts is therefore able to consider the long term growth requirements of a region, including at settlements within or near the indicative green belt areas shown on the North and South East spatial strategy maps. It is not accepted that green belts will bluntly restrict growth but rather that green belts should be considered through a formal statutory process which is able to consider growth across the full region to maximise sustainable development and regeneration; establish settlement hierarchies and the locations for strategic regional growth in the context of the NDF; and determine the appropriate regional response to development pressures outside of the region.
- 4.7.85 To avoid uncertainty on what should happen in the indicative green belt areas shown on the North and South East spatial strategy maps in advance of the adoption of SDPs, changes will be made to the policy to make clear that LDPs and development management decisions should not permit major development in these areas until the publication of the respective SDPs.
- 4.7.86 The comments on inconsistency between the North and South East region policies are accepted and greater consistency will be introduced. As a result of other changes this policy will be renumbered Policy 34; and re-titled for consistency purposes, Green Belts in the South East.

## **Welsh Government Response - draft Policy 31: Growth in sustainable transit orientated settlements**

- 4.7.87 A number of responses expressed concern regarding a lack of detail on the Metro proposals, which will have a significant influence over future development locations. Some responses also considered there needed to be greater policy focus on public transport in general and other opportunities not associated with the individual Metro proposals.
- 4.7.88 The NDF has been significantly updated in response to consultation responses relating to transport issues. Chapter 4, which covers national strategic matters, has been expanded with additional policies on International, National and Regional Connectivity (proposed Policies 10, 11 and 12). The National and Regional Connectivity policies have been informed by calls for a greater focus on active travel, public transport and reducing the use and ownership of private vehicles. These are fundamental principles in Planning Policy Wales and have been reflected in the updated NDF.
- 4.7.89 The National and Regional Connectivity policies now set out the strategic approach to connectivity and how the Welsh Government will support and invest in improvements to active travel and public transport. The regional policies have been amended to focus on their specific Metro proposal with an emphasis on improving connectivity within their respective regions and neighbouring regions. The policies set direction and provide support for the consideration of the detailed Metro proposals to ensure associated benefits are maximised.
- 4.7.90 As part of introducing greater consistency, the policy will be renamed “*South East Metro*”, and as a result of other changes it will be renumbered Policy 36.

## **Welsh Government Response – draft Policy 32: Cardiff airport**

- 4.7.91 The Welsh Government recognises the concerns expressed in some consultation responses that Cardiff Airport, and any future expansion, is inconsistent with the decarbonisation and sustainable objectives in the NDF. However it is also recognised that Cardiff Airport is an essential part of Wales’ strategic transport infrastructure and a key driver within the Welsh economy. It is an international gateway connecting Wales to the world and an essential part of Wales’ strategic transportation infrastructure.
- 4.7.92 The NDF has been significantly updated in response to consultation responses relating to transport issues. Chapter 4, which covers the national strategic matters, has been expanded with three additional policies on International, National and Regional Connectivity (proposed Policies 10, 11 and 12). Cardiff Airport has been identified as a Strategic Gateway, under the International Connectivity policy. This is to recognise its international



connections, scale and the role it plays within the economy of Wales and the region.

4.7.93 The NDF supports appropriate development which can enhance international connectivity and can be accommodated within statutory climate change targets and carbon budgets. Decisions associated with international aviation will need to demonstrate how they can be accommodated within the statutory climate change targets and carbon budgets.

### **Welsh Government Response – draft Policy 33: Valleys Regional Park**

4.7.94 Comparatively few comments were made in relation to draft Policy 33. Those that were made were generally supportive of the approach. Some respondents sought greater clarification of the Valleys Regional Park, its role, its delivery and status. The Valleys Regional Park is best planned for and delivered through Strategic and Local Development Plans. Working of delivering the Park is underway and the Welsh Government is working directly with local authorities and key stakeholders. Appropriate development plan policies and allocations can ensure that local communities and the wider region benefit from the Welsh Government's actions and investment; and that housing, employment, commercial and related developments are planned and co-ordinated with the Valleys Regional Park. The NDF policy as drafted is sufficient to support this work. As a result of other changes this policy will be renumbered Policy 35.

**The proposed changes address Conclusion 50 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.**

## 4.8 OTHER ISSUES AND NEW PROPOSED NDF POLICIES

### *Full response form Question 15 and Easy-read Question 8.*

4.8.1 Question 15 has been presented before questions 12, 13 and 14 because it is more closely related to the previous questions and preceding text.

#### **Question 15 – Other Issues**

Q.15 Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

#### **Question 15 – Main Themes**

4.8.2 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment.

<b>Theme</b>	<b>Code</b>	<b>Count</b>
<b>Plans lack detail / evidence / transparency/ need clarification / are flawed</b>	Detailed evidence base not provided /tourism / tourism impact not accounted for / national transport planning / detailed definitions and criteria e.g. green infrastructure / reference to strategic economic policies	<b>98</b>
<b>Wind/solar developments</b>	Disagree with use/building of wind turbines/wind turbines spoil areas of natural beauty	<b>88</b>
<b>Local democracy/ decision making</b>	Plans oppose local decision making/want local consultation and decision making/ability to object to new RE (wind or solar) developments/to object on grounds of impact to landscape	<b>75</b>
<b>Concerns about physical impact</b>	The protection existing assets / open spaces/ of the countryside/rural areas/areas of natural beauty / Ancient Woodland / ecosystem / wildlife/ landscape/ biodiversity	<b>71</b>
<b>Alignment</b>	NDF Conflicts/ needs alignment and reference to other key WG policies and legislation e.g. Planning, PPW and TANs, processes for Nationally Significant Infrastructure Projects, WIIP, Economic Development policies/initiatives (including regional), Transport, Historic Environment (Wales) Act 2016 / City Growth Deals etc, Wales Energy Priority Areas, Education, Health etc	<b>60</b>
<b>Consultation</b>	Respect the views of respondents/the electorate	<b>46</b>
<b>Alternatives</b>	Proposals should consider alternatives to onshore wind or large solar power e.g. offshore, tidal, biomass, nuclear, hydroelectric, hydrogen	<b>46</b>
<b>General</b>	Generally disagree with proposals/the NDF/think the proposals will be bad/ damaging for Wales	<b>43</b>
<b>Rural areas</b>	Take the views of communities into account	<b>40</b>
<b>Local democracy</b>	Request greater engagement with local/ representative bodies	<b>39</b>
<b>Transport and travel</b>	No overarching policy on transport - good transport links vital for economy/tourism/active travel/need to improve	<b>37</b>

	transport/road network / concerns about national transport infrastructure (inc. M4)/needs to refer to new	
<b>Alternative suggestion (smaller scale or local)</b>	Invest in self-sufficient/own energy grants/own energy /re-introduce grant funding for installation of solar panels on houses/planning conditions for solar and heating panels on commercial developments/housing developments (carbon neutral new builds) / local energy generation / peat bogs etc	<b>34</b>
<b>Consultation</b>	Consultation hasn't been advertised enough/isn't fair/is foregone conclusion/decisions have already been made / meaningful consultation needed/ time allowed for consultation inadequate/ space for responses on certain questions / difficulty in navigating the documents/ unable to access mapping data from Arup - not open to scrutiny, not overlaid for scrutiny / needed wider consultation with wider sectors and stakeholders / consultation not fit for purpose	<b>34</b>
<b>Concerns about negative economic impact</b>	Proposals will result in loss of (tourism and related and others) jobs/investment; will change perceptions of tourist offer	<b>32</b>
<b>Wind/solar developments</b>	Area too large/reduce the scale of wind /solar farm plans	<b>31</b>
<b>Plan layout and presentation</b>	Concerns with colours on maps / missing information on maps/ presentation / wording/ paragraph numbering and references / layout of the document/ boundaries shown etc	<b>31</b>
<b>Rural areas</b>	Not enough detail or emphasis given to Welsh landscape/areas of natural beauty/value of landscape (e.g. historical/cultural, health, wellbeing, recreation, economic)	<b>30</b>
<b>Wording and amendments</b>	Specific wording changes or amendments requested or suggested	<b>29</b>
<b>Alignment</b>	Concerns about conflicts with Future Generations Act / needs of future generations / lack of alignment with	<b>28</b>
<b>Alignment</b>	Concerns or clarification needed on how the NDF will be used/ how it will relate to SDPs and LDPs and PPW / how lower tiers will work / at what stage it will carry weight	<b>27</b>
<b>Housing</b>	Concerns only affordable housing mentioned/WG need enable housing development more generally including general housing / sustainable sites should be available to meet housing needs in Wales / not appropriate for mid-Wales	<b>26</b>
<b>Viability</b>	Scrutiny / lack of scrutiny/ monitoring - plans need to be tested for soundness, scrutiny etc (with evidence to support) / concerns that if not tested for soundness will not be deliverable/ cause conflicts with lower tiers / clarity on monitoring, evaluation and review	<b>25</b>
<b>Regional bias concerns</b>	Affecting some regions more than others/ concerns investment will be directed unfairly (lack of investment in mid-Wales/Valleys/Newport)	<b>23</b>
<b>Housing</b>	Concerns with housing figures/ housing need figures will become targets / housing need figures are too low compared to current LDP targets / how affordable housing targets can be met / ability of HAs and Councils to deliver within budget	<b>21</b>

<b>General support</b>	Generally agree with principles/aims/outcomes of the NDF but some have concerns	<b>20</b>
<b>Local democracy</b>	Doesn't give enough weight to LDPs/ LDPs and SDPs should be taken into account / Rural Development Plans (RDPs) should also be taken into account	<b>19</b>
<b>Energy transportation</b>	Concern about how to connect rural wind/solar farms to the national grid/infrastructure necessary to transport the energy/pylons	<b>18</b>
<b>Priority areas</b>	Disagree priority areas identified for RE	<b>17</b>
<b>Plans lack detail</b>	Economic growth plans and context of other policies and initiatives / impact of Brexit	<b>17</b>
<b>SDPs</b>	Concerns about role of SDPs - needs clarification on who/when/how and resources; potential policy vacuum due to timing	<b>16</b>
<b>Consistency</b>	Too prescriptive/too much detail in some areas but not so in others for a strategic document - on some matters e.g. electric charging points, semiconductor, housing - is confusing	<b>15</b>
<b>Plan lacks detail on growth targets</b>	NDF should reflect growth not just existing centres / NDF needs to be clearer on targets it is setting	<b>14</b>
<b>Consultation</b>	Concerns that business interests/ commercial concerns are driving proposals rather than being in the interests of the public	<b>13</b>
<b>Proposals don't go far enough</b>	NDF lacks ambition and vision /is a missed opportunity/ is unclear what it is aiming to achieve / its purpose	<b>13</b>
<b>Plans lack detail</b>	National Forest or suggestions for woodland management / plans unrealistic or lack detail	<b>10</b>
<b>Plans lack detail</b>	Long term health and social care planning / impact on health services including rural areas	<b>10</b>
<b>Three region model</b>	Generally oppose three region model / have concerns	<b>9</b>
<b>Plans lack detail</b>	Climate change not covered in depth / not ambitious enough	<b>9</b>
<b>Viability</b>	Investment and resources need to be considered to ensure NDF can be delivered including in 'unviable' areas	<b>9</b>
<b>Greenbelt</b>	Disagree with approach; query need for establishing greenbelt / no evidence / clarification needed	<b>9</b>
<b>Growth</b>	NDF will constrain growth because too prescriptive	<b>8</b>
<b>Housing</b>	Role of housing not acknowledged as a key economic driver / WG need to look at housing development more generally	<b>8</b>
<b>Wind/solar developments</b>	Rural roads cannot cope with heavy goods vehicles for wind farm construction/will cause disruption to road network/local residents.	<b>7</b>
<b>Digital connectivity</b>	Should refer to mobile as well as broadband/internet; lack of broadband connectivity in rural areas is an issue; references needed to Wholesale Infrastructure Providers	<b>7</b>
<b>Plans lack detail</b>	Little reference to and protection of Historic environment / heritage not mentioned and these and other community assets need to be protected; culturally important and key to the tourism sector	<b>7</b>
<b>Plans lack detail</b>	Flood, drainage and related risks, implementation, effect on development opportunities etc not mentioned in any detail	<b>7</b>

<b>Welsh language concerns</b>	Further emphasis needed on economic prosperity in Welsh language strongholds /reduce emphasis on Welsh language	<b>6</b>
<b>Outcomes</b>	Outcomes and proposals are contradictory or conflict with each other - leaves too much open to interpretation due to lack of details	<b>6</b>
<b>Plan lacks detail</b>	No comprehensive RE policy for onshore and offshore/ marine resources not covered	<b>6</b>
<b>Viability</b>	Too much focus on growth in town and city centres but lack of evidence to demonstrate this growth is viable / lack of understanding of rural areas and how they differ from urban	<b>6</b>
<b>Alignment</b>	Align energy policies with UK-wide policies and developments - avoid duplication/make use of expertise / how wider UK policy will impact on Wales	<b>5</b>
<b>Plan lacks detail</b>	Agricultural communities and farming and support (little reference to agricultural land quality and WG Agricultural Land Classification)	<b>5</b>
<b>Green Infrastructure</b>	Clarification needed on Green Infrastructure - identification of areas to be safeguarded, definition of terminology / plans unrealistic/not ambitious enough / should include blue infrastructure	<b>5</b>
<b>Plans lack detail</b>	Little reference to education, education provision / impact on education	<b>5</b>
<b>Plans lack detail</b>	Tourism impact and recognition of the sector through policy to support growth	<b>5</b>
<b>New build</b>	Planning should facilitate high level of energy conservation	<b>5</b>
<b>Long term plans need to be protected</b>	Long term plans need to be protected from political changes such as new ministers/administrations etc	<b>4</b>
<b>Plan lacks detail</b>	National Parks - only shown on diagram - not in regional plans	<b>4</b>
<b>Housing</b>	Increasing developments will lead to overcrowding/an increase in pollution/ congestion and pressure on services	<b>3</b>
<b>Low emission vehicles/ reducing emissions</b>	Need greater investment/faster development of charging points	<b>3</b>
<b>Plans lack detail</b>	North-south connectivity infrastructure (not long term enough in plan)	<b>3</b>
<b>Housing</b>	Disagree with greenfield for housing, use town and city centres to regenerate / brownfield	<b>3</b>
<b>Plans lack detail</b>	Border connections in Wales - west-east connectivity and links need to be considered / South East Wales and south-west links not considered / cross-border (England) impact of developments need to be considered	<b>3</b>
<b>Migration</b>	Inward and outward migration and associated issues not covered in detail in NDF	<b>2</b>
<b>Plans lack detail</b>	No position on fracking indicated	<b>2</b>
<b>Urban areas</b>	Urban areas can be sustainable/green/achieve critical mass / invest in cycle lanes	<b>1</b>
<b>Plans lack detail</b>	Consequences of NDF impact not identified in consultation	<b>1</b>
<b>Plans lack detail</b>	Food security/supply chain/ local food	<b>1</b>
<b>Balance</b>	NDF emphasises energy policy over other development priorities	<b>1</b>

<b>Plan lacks detail</b>	Role of ferries and ports only shown on map - nothing which outlines current or future role	<b>1</b>
<b>Plan lacks detail</b>	Policy framework for land use such as retailing, recreation, leisure, minerals, tourism	<b>1</b>
<i>Other (unspecified)</i>		<b>43</b>

### **Question 15 - Commentary**

4.8.3 The following section provides an easy-read commentary on concerns expressed by respondents. It also includes selected quotes, presented in italic, reinforcing those views.

As this question gave respondents the opportunity to comment on anything relating to the NDF, the topics varied widely. Some re-emphasised points already made elsewhere in their response or expressed strong disagreement with the NDF, either in general or specifically, regarding one or more of the proposals. Others made comments on the NDF as a whole, particularly raising issues such as the perceived lack of evidence base, querying how the implementation of the NDF would align with planning policy and other tiers as well as other policy areas or initiatives. The key and other common themes are discussed in more detail below.

A frequently raised concern related to a perceived lack of detail and content within the NDF. In particular, reference was made to the lack of evidence base to support the proposals put forward. Without the ability to review the evidence on which the NDF has been based, many respondents questioned the viability of the proposals and how they might be delivered, especially within the context of the three-tiered planning system.

Although many people highlighted issues with the evidence base in general, some referred to specific areas where they felt evidence was lacking. This included evidence relating to tourism, transport, flood risks, green belt, housing, population growth, regions, education and health.

*Whilst we are fully supportive of the preparation of an NDF, it is fundamentally flawed in that it is overly prescriptive without being based on a sufficient evidence base. It moreover lacks balance, would unduly constrain the ability of subsequent SDPs and LDPs to deliver the aspirations of the economic ambitions of the growth deals... The NDF as drafted would not provide a clear framework and presents a significant risk to achieving the Government's national strategy set out in Prosperity for All, hindering sustainable economic growth, with a potential moratorium on growth in large parts of the country, including SE Wales.*

On a related note, concerns were expressed that the NDF does not take into consideration or align with other existing legislation, policies and initiatives. A wide range of policy areas were mentioned including the overall programme for government as outlined in *Prosperity for All* but also key development programmes such as City Growth Deals and regional initiatives in north Wales and the south Wales valleys. Some commented that little mention was made of a wide range of policies and legislation on health, education, active travel, future generations, environment, marine plans.

*There seems to be little attempt to have policies coherently underpinned by robust evidence such as housing viability or aligned with active existing regional agenda such as Growth Deals, which raises concerns that the NDF can be effectively delivered.*

*The main direction of the NDF, with its promotion of huge areas of wind turbines across rural Wales and the presumption for development does not appear compatible with the seven goals of the Well-Being of Future Generations (Wales) Act 2015 or the objectives of the Environment Act. There is virtually no reference to the impact of tourism of the eleven outcomes.*

*Clearer links need to be made with DNS, WIC and the Wales Infrastructure Investment Plan, as currently there is no mention of DNS and WIC in the draft. Links also need to be clearly made between PPW, SDPs LDPs and the LDP Manual. A table setting out the links and relationships between the relevant plans would provide clarity. Links also need to be made with how wider UK policy affects Wales, as planning issues just across the border can have a long-term impact on Wales.*

There were particular concerns about the perceived lack of transparency resulting from a lack of evidence and limited access to information which could be used for thorough review and scrutiny to establish the viability of the proposals. Some respondents noted that Welsh Government had indicated that the NDF would not be independently scrutinised and were concerned that this would not allow the plans to be fully tested for 'soundness'. They highlighted that this is contrary to the process which LDPs and SDPs have to comply with. Concerns were expressed that the lack of detail left many proposals in need of clarification, particularly in the absence of independent scrutiny.

*It is our view that the evidence base falls a long way short of what would be expected of a document forming part of the development plan, particularly in respect of the proposed requirement for Strategic Development Plans to identify green belts. While forming part of the development plan, we note that the NDF will not be subject to independent examination. This should not be a reason to bypass the preparation of a robust evidence base to support and justify the NDF's policies. In short, we strongly object to the NDF as drafted given the lack of evidence supporting the proposed policies.*

*I agree with this approach; the scale and location of growth is best identified at the regional and local levels where there is greater knowledge and understanding of local issues, for example, regeneration initiatives, growth strategies, market areas and constraints. Furthermore, given that there is currently no intention for the NDF to be subject to examination it is vital that the scale and location of growth are developed and identified under SDPs and LDPs to ensure that the proposals are subject to appropriate scrutiny; the NDF should help frame the work to be carried out under SDPs and LDPs but not define it.*

*Further context and evidence are needed on certain topics to enable better infrastructure decisions and long-term investment. The involvement of wider sectors and stakeholders could also help form a stronger evidence base. This lack of evidence means that much of the plan seems simplistic and are not overtly based on evidence as LDP's are.*

*To increase understanding of how the NDF intends to influence lower tier plans, it would be better if the Welsh Government could identify the national issues in this document that lower tier plans are best placed to address, especially where evidence is still awaited.*

The responses drew attention to confusion about how the NDF will work with existing planning policy and how the three-tier system would work in practice. The timing of the introduction of the NDF was also queried and some respondents identified that there could be a 'policy vacuum' until SDPs were in place which needed careful consideration.

*Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole (the three tier framework). Whilst this is well explained in the introduction (Chapter 1) as is the fit with PPW and Technical Advice Notes, later chapters (including Renewable Energy and the regional sections) fail to recognise the synergy of the three tier system and also how the NDF relates to the existing national policy framework in PPW/TANs. Further cross-references with PPW and TANs would be welcome to firmly establish the policy framework.*

*Whilst there has been much work undertaken to seek the development of a SE Wales SDP, it will not be in place for a number of years. An LDP would not be considered 'sound' if it were to base its strategy on a process yet to be defined. The weighting of the policies in the NDF prior to the adoption of an SDP is something that needs further clarification. How do Area Statements fit in, is it not a requirement of development planning to have regard to these documents?*

*The NDF requires significant policy detail to be provided by the proposed SDP's, yet there appears to be no clarity on how and when SDP's will be adopted. This raises the concern of a 'policy vacuum' being created in which strategic issues are not dealt with due to the lack of detailed policy guidance within an SDP, resulting in decisions continuing to be made at a local level as part of the ongoing round of LDP reviews.*

At a more general level, some respondents pointed out the lack of detail presented in the outcomes and proposals put forward. This contributed to calls for clarification on the meaning, interpretation and ramifications of some of the content within the NDF. Some noted that the lack of clarity would place the burden of interpretation on the lower planning tiers which would be problematic and would cause problems with planning decisions or potentially stifle development. Some respondents also noted omissions in the document on issues which they felt should have been included or more thoroughly considered including transport infrastructure, a comprehensive renewable energy policy, economic, housing, national forest, digital infrastructure, flood risks and climate change, green belt and green infrastructure.

*There is also a need for the NDF to be clear in regards to what it means for practitioners and how they use it and understand what the NDF is for, as well as how it is different from PPW10.*

*To increase understanding of how the NDF intends to influence lower tier plans, it would be better if the Welsh Government could identify the national issues in this document that lower tier plans are best placed to address, especially where evidence is still awaited.*



*There is a lack of detail on certain topics. The outcomes have no clear detail on actions and directions. And on certain topics (e.g. Mobile Action Zones, biodiversity enhancement, national forests etc.) it only stipulates that areas and sites are to be identified, but does not clarify the how and when. And on topics where there is a lot of detail, it only highlights the inconsistencies in other places.*

*Disappointingly, the NDF makes no reference to addressing the M4 congestion and the consequential adverse impact on the economy of Wales. The NDF proposes economic growth but is silent on the M4, this is considered to be a significant omission from the 20 year spatial development plan for Wales.*

*There do not appear to be any specific transport proposals in the NDF yet the proposed Metro will have a huge influence over the sustainability of development locations. The Metro proposals should be included in the NDF. There should also be a policy on tackling pollution hotspots - not just noxious gases but also particulates.*

*The NDF recognises that climate change is the greatest threat to development in Wales, however flooding and managing its impacts is not included within the framework. This very light reference to flooding and flood management does not draw enough consideration to how flood risk will limit development opportunities across Wales. Flooding is one of the greatest natural hazard risks in Wales and the risk of flooding is only expected to increase as a result of climate change. We must have a framework that gives direction and guidance to how Wales' future development can adapt to the impacts of climate change, especially adapting to increased flood risk.*

*The NDF is largely silent on the importance of developing digital infrastructure across Wales. Superfast Broadband or copper to fibre infrastructure is now yesterday's technology and the need to ensure that full fibre to premises is achieved across Wales to improve its attractiveness as a place for modern business is essential. This needs to be at the forefront of the aims and objections of the NDF and is largely missing without detail about how it can be secured.*

Some respondents were particularly concerned about the implications of some of the policies and statements within the NDF. A commonly highlighted issue was the implication for local democracy and decision making. There were very strongly expressed concerns that some of the proposals would have major implications for local decision making powers and the ability of second and third tier planning structures to make choices which reflect local need.

Many respondents felt that the proposals indicated a move away from local democracy and towards the centralisation of decision making which they were strongly opposed to. They felt that the NDF as it stands would rule out any meaningful consideration of the concerns of local residents, particularly if the ability to object is removed.

*The Welsh Government cannot ignore the views of the Welsh People. Local people have disagreed with a number of attempts to destroy Wales with large pylons - this plan should acknowledge that feeling and not over-ride it.*

*The mid Wales landscape is a key factor in providing employment in tourism and the economic benefit that visitors bring. Imposing wind and solar development in mid Wales through a national policy that accepts landscape change is unacceptable. Such applications should be determined at county level.*

*Please produce an evidence based plan, not simply a wish list written by people in Cardiff. Please pull together an effective analysis of Welsh requirements for renewable energy and relate this to volumetrics about all potential sources of energy - i.e. off shore wind, hydro, tidal etc.*

There was a strong feeling among some respondents that the consultation had not been carried out in line with their expectations for a major policy area which will have such wide-ranging and long-term implications. The perceived lack of evidence and independent scrutiny to test the viability of the proposals heightened these concerns.

Some responses queried a perceived lack of engagement with the general public and stakeholders through the consultation, some citing too few local events and limited publicity including links to appropriate documents. Others were concerned about the lack of time allowed for meaningful consultation and response and a lack of confidence that their views would be taken into account. On a related matter, some experienced difficulties navigating and accessing information about the consultation on the Welsh Government website. Some of the key stakeholders were also concerned that they were unable to access mapping and other data behind Arup's proprietary tools.

*I and many others believe that this whole 'public consultation' is just tokenism and carried out to try to hood wink the general Welsh populace that the WG really will take any notice of our objections/suggestions. The WG will just continue to take more control centrally and steamroll their fanatical renewable energy plans through. We have little local democracy or a local voice now - if this plan is adopted (as is a foregone conclusion anyway) then local democracy is well and truly dead in Wales.*

*I think this consultation has been introduced in a fairly low key manner. Many people who would be affected are not aware of it and it has been up to private individuals to spread the word.*

*The NDF is set to influence emerging policy at both the regional and local levels through the production of SDPs and LDPs that will be required to align with the NDF. However, there will also be an interim period prior to the adoption of SDPs and new/replacement LDPs whereby a policy vacuum is likely to exist for many LPAs. As such, the NDF will take on a heightened role in decision making due its development plan status. Given the weight that will be afforded to the NDF it is paramount that the plan is robust and justified on sound evidence. Consequently, we consider it is necessary for the plan to be subject to examination and public scrutiny, as per traditional development plans.*

A few respondents also noted that it was not possible to comment within the consultation questionnaire specifically on some parts of the NDF, such as the Introduction and Section 2 – Challenges and Opportunities. There was also some confusion about where to direct comments relating to Green Infrastructure.

Some responses highlighted detailed suggestions for changes in the format, layout, content, policy wording and presentation of the NDF. Many suggested areas where they felt further clarification was needed or where there were significant omissions such as references to the AONB's and National Parks. Others commented on inaccuracies or omissions on the maps within the document, for example, where locations were incorrectly mapped or population data was incorrect.

Some respondents also found information contradictory within the document. There was also reference to inconsistencies with the language “must” and “should” which created confusion.

*Sometimes the NDF is trying to do too much in one document and failing to make appropriate links to the complementary coverage that PPW and TANs already include on national issues. In other places (e.g. Policy 5 and Policy 8) the approach is far clearer.*

*The outcomes are mostly laudable aims but there is a real issue on deliverability, particularly when they are in part contradictory. For example, Outcomes 2, 3, 5, 6, and 8 would support growth whilst Outcomes 9, 10 and 11 seek to protect and enhance natural resources and the environment. A conflicting set of objectives cannot deliver sustainable development. However, it would be left for Local Planning Authorities to try and reconcile this through their LDP's which would be difficult.*

Objections to the proposals for wind and solar energy were frequently raised, often echoing fears outlined earlier in this summary regarding damage to the landscape and communities and the wider economic, health and social impacts of this. Some expressed general disagreement with the proposals while others noted omissions in the NDF with some making alternative suggestions. A key concern was the limited number of options for renewable energy generation which were presented in the proposals and the omission of other potential alternative large scale solutions notably marine-based technology such as tidal and offshore wind as well as other suggestions including nuclear, hydroelectric, biomass or hydrogen.

*Renewable energy: All forms should have equal weighting – not just wind and solar.*

*As it stands it has a glaring omission ... where are the offshore wind farms and tidal barrages? Those are the real future for renewables in North Wales.*

Objections were raised about the scale of the renewable energy proposals and the lack of consideration of the role that smaller alternative local and regional solutions could play in future plans. These included local energy generation and grants to facilitate this, including small scale solar and heating projects, peat bogs and self-generation. Some would also like to see the NDF stipulate the need for conservation principles to be embedded into the planning process for new builds and housing developments in an effort to make them carbon neutral.

*Promote different methods of promoting own generation of energy - including re-visiting the solar tiles/ roof panels. Plan includes the building of new property - ensure this meets the highest conservation of energy levels.*

*Low impact living is what needs to be encouraged and covering the country in wind turbines is not going to solve our pending energy crisis. Explore tidal energy instead! Generate power to power people locally not nationally. Stop subsidising fossil fuels and build more off shore wind farms. Accept that this plan has not been properly thought through as there simply is not the infrastructure to transport and store this energy should these plans go ahead.*

*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.*

The lack of consideration the NDF gave to energy transportation was also highlighted in response to this question. Firstly, concerns were expressed about the impact of the infrastructure which would be needed to connect rural wind or solar farms to the national grid, including pylons, for example. Secondly, many questioned the capacity for rural roads to cope with the heavy construction traffic and the disruption that this may cause to local residents and communities.

*The NDF makes only a slight reference to connecting wind and solar generating sites to the national grid. This is as significant as the generating sites themselves - potentially introducing large pylons across areas currently free of such visual intrusion. This is an oversight and the potential corridors for grid connections should be shown for each 'priority area'. Also, the rural road network of mid Wales is unsuitable for the over-size vehicles that are required to build groups of large wind turbines and enormous pylons and their cables.*

Concerns about the housing proposals were raised which specifically referred to the scope of the NDF to address housing needs across Wales. These respondents felt the focus on affordable housing outlined was not a viable approach to planning or meeting the long-term housing needs across Wales. They highlighted that the proposals do not take into account the need for general housing or reflect market need or demand in terms of location and other factors. Some commented that the proposals do not learn from past mistakes in housing policy.

Concerns were also expressed that the housing need figures referred to within the NDF could be misconstrued as housing targets which would not be realistic yet would be used as a measurement tool. Some went on to express concerns that this would have ramifications for SDP and LDP planning including restricting their ability to deliver developments which reflect the needs identified at a local or regional level.

*The housing figures within the plan are based on new methods that are subject to debate. The danger of putting housing 'need' figures on the face of the NDF are that they become 'targets' that LDP's will be tested against. Given that the figures are widely considered low and suggest unviable levels of social housing this is problematic.*

*The statistical release for the Estimates of Housing Need provides caveats that they are estimates based on a given set of assumptions, aimed at forming a basis for policy decisions. It is clear that the figures in the statistical release "should not be used as housing targets," yet there is a real danger that the inclusion of a single figure in the NDF without a full explanation of what this figure is will result in the figure being treated as a target. There is some recognition that these estimates provide part of the evidence base and context on which the SDP should be based, but this should go*

*further to state explicitly that this figure is not a housing target, but is informed by household projections that are based on past trends.*

*The draft NDF needs to be explicit in that it is not setting out the scale of growth at any level, but instead provide an indication of the minimum likely requirements. As previously highlighted, we are concerned that the central estimates of housing need detailed in the plan are effectively being presented as targets and will further suppress the delivery of much needed housing in Wales.*

Some also felt that the importance of the role of housing as a key economic driver was not appropriately acknowledged within the NDF in the way that other policy documents recognise. Some expressed the need for the housing proposals in the NDF to recognise and give due consideration to the link between housing and wider health and social issues evident in Wales and the pressure that new developments could create on existing resources.

*It would also help if the NDF recognises that some activities contribute to more than one outcome. Housing not only provides places for people to live, but creates jobs, drives innovation and (in some cases) recycles and transforms land. This is broad spectrum economic activity and also meets the much wider definitions either used or implied in national economic development policy. That Policy specifically recognises the multiple dividends from new housing and it would be helpful if the NDF did that too.*

*A genuinely sustainable strategic approach to achieving the statutory well-being goals would ensure co-ordination between housing plans and health care, so that every proposal for housing development would have to incorporate specific provision for how new residents would be able to access primary and secondary health care and social care services. To focus solely on setting and meeting building targets, without taking into account and making advance provision for the health needs of eventual residents, is not only irresponsible and symptomatic of fragmented government, it appears to me to be in clear conflict with the well-being goals.*

In this general question, respondents expressed their concerns about a range of issues already covered in this proposal in some detail. These included strong disagreement with the three region model and worries about the impact on the landscape particularly in rural areas which rely on tourism, a lack of protection for heritage and cultural assets, the potential negative economic impact, the location and scale of priority areas, regional development bias within the proposals, an 'urban-centric' approach to development which they felt does not take into account the differences with rural areas of Wales and concerns over the impact on Welsh language communities.

Some also felt that overall the proposals would constrain growth in Wales and demonstrated a lack of vision or ambition for a long-term plan and considered this "a missed opportunity". Some respondents expressed general support for the principle of developing a national plan such as the NDF before going on to highlight their concerns.

### Easy-read Question 8 - Other Issues

Q.8 Do you have any other comments you would like to make about this plan?

### Easy-read question 8 – Main Themes

4.8.4 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment.

Theme	Code	Count
Wind/solar developments	Disagree with use/building of wind turbines/wind turbines spoil areas of natural beauty	19
Consultation	Respect the views of respondents/the electorate	14
General opposition	Generally disagree with proposals	10
Alternative energy provision	Government should consider offshore wind farms or tidal power/biomass/nuclear power	10
Local democracy/ decision making	Plans oppose local decision making/want local consultation and decision making/ability to object to new wind developments/to object on grounds of impact to landscape	9
Rural areas	Other concerns about the protection of the countryside/rural areas/areas of natural beauty	8
Wind/solar developments	Ecological impacts/environmental damage/damage to countryside	7
Mid and South West Wales region	Plans disproportionately impact mid-Wales/mid-Wales not being listened to	6
Economy	Proposals will lead to profiteering/ money making/ exploitation of Wales	5
Energy transportation	Concern about how to connect rural wind/solar farms to the national grid/infrastructure necessary to transport the energy/suggest underground cabling	5
Consultation	Consultation hasn't been advertised enough/isn't fair/is a fait accompli/decisions have already been made	5
Wind/solar developments	Won't produce enough energy/will be ineffective/not value for money	4
Rural areas	Not enough detail or emphasis given to rural communities in plans/how will rural communities be supported for growth/too much emphasis on urban areas	4
Renewable energy	Agree with plans to reduce emissions/renewable energy is important/will benefit economy	3
Plans lack detail	Not enough information on how electric cars/charging infrastructure will be delivered/rolled out	3
Tourism	Concern wind turbines will decrease tourism	2
Three region model	Too much emphasis on South East/Cardiff	2
Transport	Good transport links vital for economy/tourism/active travel/need to improve transport	2

<b>Alternative geography/split of regions suggested</b>	Should be four regions/depends on boundaries/there are differences between north-east and north-west Wales	<b>1</b>
<b>Plans lack detail</b>	Maps inadequate for decision making/need more detailed maps/need population map	<b>1</b>
<b>Housing</b>	Concerned about the environmental damage of housebuilding/new houses should be eco-friendly/carbon neutral/energy efficient	<b>1</b>
<b>Perceived error/ omission in the NDF</b>	Omitted/missing documents (Links to ARUP evidence documents)	<b>1</b>
<i>Other (unspecified)</i>		<b>7</b>

## Written Submissions

### Transport – rural and cross-border connectivity

Submissions involving transport were highly regionally specific, with respondents highlighting current poor connectivity from particular rural areas in North and mid Wales. These areas overall were described as poorly connected to other regions in Wales as well as to England. A detailed submission from North Pembrokeshire Transport Forum stressed the importance of taking into account multi-modal transport spanning all the proposed regions and suggested taking an ‘all-Wales’ approach to transport, rather than planning transport needs at a regional level.

*NPTF rail surveys continue to provide evidence that:*

- *Users of public transport systems currently travel for a variety of reasons: for employment, recreation, medical appointments, family obligations, educational pursuits, as well as on holiday (e.g. tourism – to/from international destinations). These (often multi-modal) journeys (provided by more than one operator and/or authority) cross urban and rural boundary lines on a daily basis.*
- *The current provision and coordination of such varied user journeys by a mixture of urban, rural and cross-border operators and authorities leaves much to be desired - given the complexity of journeys and modes of transport.*
- *Given the fact that transport transcends local and regional interests and requirements, it is logical for the Welsh Government to hold the responsibility for transport policy and strategy throughout Wales.*

*NPTF recommends that future Welsh Government transport policies and strategies be designed to meet the transport requirements of users throughout Wales, and not just to selected regions, and that SDP strategies and policies should be predicated upon this prerequisite.*

### North Pembrokeshire Transport Forum (NPTF)

Some submissions determined that the importance of transport links to England hadn’t featured heavily enough when considering travel in the proposals, with some suggesting more effective transport links to England from North Wales were needed, or that the NDF should

take into account that current travel from the North to the South of the country often involves travelling through England. By contrast, another submission felt that the proposals were too focused on East-West connectivity and hadn't included enough proposals on connecting the North and South of the country.

*The NDF recognizes several times that the eastern border is porous but then limits its attention to maps of Wales and transport links within Wales. It needs to recognize that for many the quickest route between north and south Wales is down the Marches – whether by rail (which it recognizes) or by road. If such a recognition were to lead to efforts to get the Westminster government to improve the roads between Shrewsbury and Symonds Yat (broadly the A49) it would do more for more people than any efforts to improve the A470 across miles of sparsely populated sheep country.*

*Rural transport is a major issue across Wales and the NDF should ensure this is addressed. Opportunities for Mid Wales arising from their proximity to the English midlands are not fully realised. The NDF should consider how these links can be improved and Mid Wales can benefit from economic opportunities across the border*

Transport's role in reducing urban sprawl also featured among responses, with linked green spaces encouraging the use of public transport and improving health through access to these spaces.

*Creating a linked network of green spaces would reduce urban sprawl and - together with the investment planned in Metro - encourage use of public transport and other sustainable modes of travel, making for a fitter and healthier Wales*

Comments relating to the wording of transport related policies included stronger references to car-free development as part of sustainable travel.

*The focus on sustainable travel in Policy 1 is welcomed, however the wording needs to be stronger to support car free development as a priority in appropriate locations.*

However, population mapping was also requested to inform the transport proposals.

## **Placemaking**

While acknowledging the references in the NDF document to its shared commitment with PPW to placemaking, some felt that the NDF document itself lacked detail in its relationship with PPW on the subject or in setting out the Government's strategic policy for placemaking requirements.

*The outcomes' relationship with PPW's National Placemaking Outcomes, the Welsh Government's Well-being objectives and Wales' Well-being Goals is unclear. It may assist if, as per Planning Policy Wales Edition 10 (2018), there was a cross matrix in the appendix to the Plan clarifying the relationship?*

## **Wrexham County Borough Council**

*The omission of a clear, positive policy on what is the highest priority overarching principle of good planning in Wales – i.e. placemaking - is a significant failing of the draft NDF. Whilst the explanations of what placemaking is, and its importance, is set out in PPW, there is a clear need for the development plan for Wales to set out in unequivocal terms what government's strategic policy is for ensuring new*



*development accords with placemaking requirements, as set out in its supporting guidance. Policy 1 of the NDF could set out the terms of this placemaking policy and relate it to the roles and responsibilities of national government, local authorities, other public sector and the private sector in delivering these key aims. This lies at the heart of nation building that the NDF will provide the overarching Plan to guide and facilitate.*

South west wales Regional POSW

## **Maps**

Several submissions commented on the maps provided in the NDF document, and made suggestions for additional contextual explanations; evidence they wished to see included on these maps to help with decision making, such as population mapping; or important elements they felt had been omitted, such as Areas of Natural Beauty or a strategic port at Fishguard. As previously mentioned, some also wanted clarification on the overlap shown on the maps between green belts and areas of growth.

*For the avoidance of doubt, it should be made clear that the spatial strategy and regional spatial maps are diagrammatic only and should not be taken as indicative of any specific land allocations. For example, the Deeside/Wrexham national growth area appears to extend up to the boundary of the AONB, which if followed literally would have a harmful impact on the setting of the protected landscape.*

### **Clwydian Range and Dee Valley AONB Joint Committee**

*Can the Society draw your attention to what must be an omission on page 2 of the draft document – the map of Wales. The map shows the areas protected as National Parks (NPs) but does not show the 4/5 Areas of Outstanding Natural Beauty (AONBs) in Wales, even though they are regarded as equals in the designated landscape family.*

### **Cambrian Mountains Society**

## **Brexit**

Multiple submissions referenced the UK exiting the European Union as a process which could have a bearing on a wide range of sectors in Wales and thus the NDF. Some comments suggested that flexibility might be needed to respond to changes arising from Brexit, while others highlighted the impacts they believed would affect certain industries, particularly agriculture.

*We also suggest that it may be beneficial to make reference to the potential need to consider any Wales related land management strategies that are developed post-Brexit in 'down the line' in-combination assessments.*

*At this time of profound uncertainty we are asking Welsh Government, through its policies, to provide stability and certainty for Welsh farmers. The planning system and the National Development Framework will need to be sufficiently flexible to respond to outcomes, as yet unknown, and to enable farmers to respond and develop sustainable farming systems for the future.*

*Economically Montgomery has a strong agricultural base, which has also benefited from EU funding via the CAP. Given the uncertainty regarding proposed Structural Funding post-Brexit, currently planned to be decided at UK rather than a Welsh level, this could pose further challenges.*

## **The NDF and the consultation undermine democratic process**

There were strong feelings that local democratic process was being undermined by both the NDF and the consultation process. These feelings of disenfranchisement from the decision-making process further explain fears among some people of Powys that rural areas of Wales are being dismissed as a homogenous hinterland with no attention being paid to local residents and local decision-making processes.

Many felt that planning decision-making was being ever-more centralised to Welsh Government at the expense of local planning processes. Described as a “*power grab*” by one respondent, there was a strong feeling that local democracy and decision-making were being undermined. Many felt that decisions about placement of wind and solar energy infrastructure should be taken at a local level, with genuine community engagement, and taking into account local conditions and feelings including the ability to object on grounds of landscape. Instead, the presumption in favour of granting planning permission for renewable energy installations that they felt was enshrined in the NDF, disenfranchised local people.

*Community Councils like ours should be the productive grassroots of planning and development in Wales. But as the Welsh Government centralises more and more planning decisions we are now becoming almost totally irrelevant, as indeed are the Powys County Council planners at the next level up who are responsible for our Local Development Plans. Now that the Welsh Government has decreed that all RE projects over 10MW are “Developments of National Significance”, power has been taken away from the people of Wales and reserved for a small group of Welsh Ministers. The result, we fear, will be a disregard for local feelings and a series of damaging, poor-quality planning decisions.*

*When a DNS application is submitted it must allow for local community engagement / consultation, there must be a clear process and communities must be given ample notice of the application to assess wider implications and impact on the community. Community engagement and consultation should also extend to those communities along any transport routes which will be used during construction phases.*

*[The NDF] operates at too large and crude a scale to be the sole arbiter with respect to the detailed siting of such large scale developments as wind power stations.*

Often comparisons were made to England where people felt that there was a much stronger local voice in deciding planning applications, especially regarding wind turbines.

It is worth noting that many people cited the recent case of the Hendy Wind Farm in Llandegley, which they seemed to view as a watershed moment in what they saw as the undermining of local democracy. Respondents recounted how local concerns had seen planning permission for the Hendy Wind Farm rejected by Powys County Council, a decision which was upheld on appeal by the Planning Inspectorate. However, the decision to not allow the development had been overturned by the Minister for Environment, Energy and Rural Affairs. It is apparent that this moment is still fresh and, for some, has led to a current deep distrust of Welsh Government in matters of planning relating to renewable energy infrastructure.

*...the member of the Welsh Government responsible, having barely had time to read the inspector’s report, overrode the whole democratic process and waved the*

*developers in. This was the act of an autocracy, not a democracy. If you want to take the people of Wales with you for your NDF, you must scrupulously observe proper democratic process and not act as you did in Powys, or your proposed National Development Framework will seem to be what might have been expected from a dictatorship rather than from a democracy*

*Sadly, the way in which works at the Hendy wind farm have been carried out, show that the authorities have no regard for the local populations in Wales*

*The people of Powys had challenged the erection of a wind farm in the wonderfully beautiful area round Hendy, near Llandrindod Wells and Powys County Council denied the developers planning permission. The developers appealed against this decision on the grounds that the production of renewable energy trumped all other considerations. After a lengthy and costly inspection, Powys County Council's decision was upheld. Whereupon the member of the Welsh Government responsible, having barely had time to read the inspector's report, overrode the whole democratic process and waved the developers in. This was the act of an autocracy, not a democracy. If you want to take the people of Wales with you for your NDF, you must scrupulously observe proper democratic process and not act as you did in Powys, or your proposed National Development Framework will seem to be what might have been expected from a dictatorship rather than from a democracy.*

*One can have no confidence in WG making unbiased judgements. Wales has already experienced Ministers overriding Planning Inspectors' well-argued RE decisions.*

Many also reported concerns over the consultation process which led to further feelings of an undermining of democratic process. These concerns tended to be that the process was a *fait accompli* due to it not being advertised widely enough; attendees feeling they weren't listened to or that the consultation would not change the final policy. One respondent pointed out that a lack of information about the post-consultation process added to these feelings:

*I do not think the process that this consultation sits within has been explained sufficiently for the lay person to enable a full response, for example*

- *what happens next?*
- *will there be a further consultation, or responses produced to this draft?*
- *when might the framework be implemented?*
- *do Welsh Government have to approve it?*

### **The NDF does not align with other policies**

There was a lot of frustration where people felt that the NDF contradicted or undermined existing policies in different ways.

There were concerns about how the NDF changes the planning policy landscape of Wales, with respondents asking how it relates to both SDPs and LDPs. This included suggestions that the status of the NDF would mean it supersedes both SDPs and LDPs. Some respondents, as discussed elsewhere in this document, directly addressed issues of the ambiguity of the NDF's status in relation to SDPs and LDPs. In the Powys energy submissions, however, concerns about this relationship were mostly expressed in terms of the way that the NDF overrides

SDPs and LDPs with regards planning decisions, especially given the feeling that the NDF “is in conflict with the objectives of the LDP”.

*This framework seems to brush aside Powys County Council’s Local Development Plan causing an erosion of local democracy by removing local decision-making.*

*Policy protections for the natural world within Local Development Plans will be swept away where the consideration of large RE development within Priority Areas is concerned.*

Some objections to these conflicts were because of feelings that they undermine the time and money that has been spent on creating regional and local plans. Another objection was that the NDF leads to a reduction in local decision making. This was seen as problematic, especially given concerns that the NDF is not sensitive to the nuances of Welsh localities. This seemed to compound feelings that local agency and understanding are being removed from the Welsh planning system and was another facet to a wide-ranging theme where respondents felt that local democracy and decision-making are being undermined by the NDF.

*The RE section of Powys County Council’s Local Development Plan has been tossed aside. The cost of producing the LDP must have been very considerable, and we now see that our money is to be wasted by the WG. So much for local democracy; the WG is behaving like a dictatorship. For many of us the LDP battle was massively stressful over a long period of time. It is beyond belief that we now have to go through it all again thanks to the WG.*

*There is nothing in the NDF to give anyone any confidence that local people will be anything other than ignored.*

Other concerns were raised that the NDF contradicted the objectives of other Welsh policies, including: *Well-being of Future Generations (Wales) Act 2015; Welsh National Marine Plan; Moorland Management Plans; Sustainable Farming and Our Land: Consultation; and Environment (Wales) Act 2016.* For many, the perceived destruction of ecosystems for the building of renewable energy infrastructure was at odds with the broad principles of sustainability and environmental protection in these other policies. This was compounded by the feelings of rural disenfranchisement already discussed.

*This does not seem compatible with the objectives of the Environment (Wales) Act or the Well-being of Future Generations (Wales) Act, or the Nature Recovery Action Plan which has committed Welsh public bodies to the ‘sustainable management of natural resources’, ‘sustainable development’ and the “enhancement of resilient ecosystems”, and also to work towards the 7 Wellbeing of Future Generations Goals. Rural areas are being regarded as provisioning areas for urban Wales without regard to their intrinsic benefits and needs.*

Other criticisms focused on the fact that consideration hasn’t been given to how different policies join-up with one another, while some pointed out what they felt were inconsistencies in detail.

*There is no consideration of how the marine plan can cross cut to deliver targets despite the now adopted plan stating at 338: Coherence across land-sea planning and consenting and with wider electricity cable considerations are important to ensure sufficient capacity to enable grid connection of new technologies.*

*The NDF documents “Assessment of onshore wind and solar energy potential in Wales”, the Marine Plan and PPW 10, (5.7.16), use the original statement made in 2017: “one gigawatt of renewable electricity capacity in Wales to be locally owned by 2030;” whereas the NDF (page 36) reads, “one gigawatt of renewable energy capacity to be locally owned by 2030.” I am sure the Welsh public would like Welsh Government to get a grip and provide clarity on what the locally owned target is, electricity or energy capacity.*

There was some suggestion that the NDF undermines historical policies which have either encouraged or necessitated Welsh farms to diversify by seeking revenue streams away from non-agricultural enterprise. One respondent said that *“upland farms have been encouraged to invest millions in tourism based diversification”* and felt that some of the businesses which have been grown as a result, and which are based on landscape-based tourism, will suffer losses where wind and solar energy infrastructure impact on this landscape.

There were also a group of people who said that Welsh plans to address climate change (e.g. decarbonisation) needed to align with UK and global policies and strategies. There was a lack of detail as to which policies people felt it was important to align to and more a sense that, in order to be successful, climate strategies need to be co-ordinated globally. As such, Wales needs to ensure its policies align to this broader context.

### **Questioning the evidence behind the NDF**

A fair amount of people who questioned the evidence base behind the NDF. Most of these criticisms referred to the NDF’s approach to wind and solar energy infrastructure. Some of these said that there was no evidence presented to justify the NDF approach while others suggested the evidence presented was weak. A third group suggested that conflicting evidence had been ignored (e.g. evidence suggesting renewable energy was inappropriate). As a result, questions were raised as to the suitability of the NDF’s outcomes, Priority Areas and policies.

*how can anyone have any confidence in the [Welsh Government’s] decision making, when it has shown itself to ignore any conflicting evidence [gives examples of other Acts/Policy that they feel contain evidence which has been ignored]*

*The spurious claim that wind farms contribute to the local economy is another of those oft repeated myths that seem to become accepted as fact by distant Governments with no supporting evidence*

A few people suggested that there had been no, or the wrong, experts used to inform the NDF. There was some suggestion that stakeholders selected to consult on the NDF had agendas which matched the Welsh Governments while others felt that the renewable energy section of the NDF favoured developers and the Welsh Government rather than the people of Wales.

*It appears evident that stakeholders who have been [consulted] are set to profit massively from the industrialisation of the hills of Wales.*

One person felt that the climate emergency was being used to justify the plan especially as the Welsh Government didn’t declare that there was a climate emergency until after the NDF was being prepared. Several people also suggested that the definition of sustainability used in the NDF is too narrow and should be broadened.

## Welsh Government Response – Question 15

### Proposed new policies

4.8.5 Under question 15 proposed new NDF policies are set out, alongside the response to non-policy issues raised in the consultation. These policies are in addition to some new policies which have been grouped together under their relevant topic areas earlier in this report.

Proposed new policies outlined in this section include:

- 8 - Flooding
- 10 - International Connectivity
- 11 - National Connectivity
- 12 - Regional Connectivity

Proposed new policies outlined earlier in report include:

- 6 - Town Centre First
- 5 - Supporting the Rural Economy
- 13 - Supporting Digital Communications
- 25 - Regional Growth Areas - Mid Wales
- 26 - Growing the Mid Wales Economy
- 27 - Movement in Mid Wales

### \* Proposed New Policy 8 – Flooding

4.8.6 A number of responses questioned why the draft NDF did not contain a policy on flooding, and why there were few references to flood risk across the document. The reason for the absence of a policy in the draft NDF was that we considered Planning Policy Wales and Technical Advice Note 15 to provide the policy and guidance required for flood risk issues to be fully taken into consideration in the planning system.

4.8.7 Some of the consultation responses highlighted how there could also be a role for the NDF in promoting effective flood risk management, especially in National and Regional Growth Areas, where there are places at risk of flooding. On reflection, we agree that a policy on flood risk management should be included in the NDF.

4.8.8 The proposed policy is a recognition of the significance of flood risks in Wales and it should help provide certainty about the deliverability of the spatial strategy and aspirations for sustainable development in appropriate locations

in the National and Regional Growth Areas. The proposed policy complements the national planning policy in Planning Policy Wales as well as the emerging National Strategy for Flood and Coastal Erosion Risk Management. The Strategic and Local tiers of the development plan should set out how flooding is taken into account in their defined growth areas and rural areas.

- 4.8.9 As well as a new policy, we propose to include additional references to flood risk and flood risk management infrastructure throughout the NDF. Chapter 2 of the NDF which sets the context and identifies key challenges will contain more detail on the implications of climate change, including how the threat of flooding from rivers and the sea is increasing. The regional sections in Chapter 5 will also include strengthened and more detailed references to flood risk in the regions.

*The proposed policy change addresses Conclusions 1 and 19 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details”*

## **Proposed New Policies – Connectivity**

- 4.8.10 The NDF has been significantly updated in light of consultation responses relating to transport issues. Chapter 4, which covers the national strategic matters, has been expanded with three additional policies on International, National and Regional Connectivity. The draft NDF had one national transport policy, which focused on ultra-low emission vehicles (*see section 4.5*), and dealt with other transport issues in the narrative and regional policies. This was primarily because a new Wales Transport Strategy is being developed and will not be published until after the NDF. However, the consultation responses highlighted the importance of having a greater focus on transport connectivity from an international, national and international perspective, this, has informed the development of three new policies, set out below.
- 4.8.11 Connectivity and movement are key issues for people in Wales and the need to travel is a central feature of their everyday lives. From an international perspective it is critical Wales is well connected to the rest of the World for the effective movement of people and cargo as part of economic networks and supply chains. At a national and regional level the NDF should enable people to access jobs, services, education and shops through shorter, more efficient and sustainable journeys with a focus on walking, cycling and public transport.
- 4.8.12 It is accepted that the NDF should have a clear focus on transport and connectivity. The new policies recognise that investment in the international, national and regional transport infrastructure can improve connectivity, support growth and help regenerate places. It is also accepted that the policies need to clearly identify the important role Strategic and Local

Development Plans will have in helping improve connectivity and deliver new transport infrastructure.

- 4.8.13 The policies reflect the Welsh Government aims is to reduce the need to travel, particularly by private vehicles, and support a modal shift to walking, cycling and public transport. This is a fundamental principle in Planning Policy Wales which has now been reflected and given greater focus in the NDF.
- 4.8.14 Some responses raised concern that the NDF does not seek to address the congestion problems along the M4 in South East Wales. The South Wales Transport Commission has been established to look at ways of solving the congestion issues in the area. The Commission's emerging conclusions were published in July 2020.. Its final recommendations should inform the emerging Strategic Development Plan for the region.

#### **\* Proposed New Policy 10 – International Connectivity**

- 4.8.15 This policy sets out how the Welsh Government will support international connectivity between Wales and the wider world and identifies Cardiff Airport, Holyhead Port, the Haven Waterway, including the Ports of Milford Haven and Pembroke Dock and Fishguard Port as strategic gateways. The International Connectivity policy integrates three regional policies from the draft NDF – draft Policies 20, 25 and 32. For further details on how the consultation responses have informed the International Connectivity policy, please refer to paragraphs 4.7.43; 4.7.70 and 4.7.91.
- 4.8.16 The Welsh Government supports appropriate development of the Strategic Gateways to maintain their international connectivity roles. It is acknowledged that decisions associated with international aviation and shipping will need to demonstrate how they can be accommodated within the statutory climate change targets and carbon budgets.
- 4.8.17 The Strategic Gateways are critical to the effective movement of people and cargo within their respective regions, Wales and the UK. They have been identified due to their international connectivity, scale and the roles they play within the economy of Wales. It is important that Strategic and Local Development Plans support the Strategic Gateways and maximise the opportunities they provide to support growth across the respective regions and Wales.

#### **\* Proposed New Policy 11 – National Connectivity**

- 4.8.18 This policy sets out how the Welsh Government will support and invest in improving connectivity at a national scale and the links between regions. It identifies that our priorities are to encourage the use of public transport for longer-distance trips, whilst making more long journeys possible by electric vehicles. It also supports the expansion of the National Cycle Network.



## **\* Proposed New Policy 12 – Regional Connectivity**

4.8.19 This policy sets out how the Welsh Government will support and invest in improving connectivity within regions and at local scales. It sets out our priorities for both urban areas and rural areas.

4.8.20 The proposed new National and Regional Connectivity policies aim to improve connectivity within and between regions, and across Wales. This has been informed by consultation responses, which highlighted that the draft NDF identified transport issues, but did not propose ways in which they will be improved. The new policies have also been informed by calls for a greater focus on active travel, public transport and reducing the use and ownership of private vehicles. These are fundamental principles in Planning Policy Wales and have been reflected in the updated NDF.

*The proposed new policies outlined address Conclusions 1, 12, 21, 22, and 31-33 from the Climate Change, Environment and Rural Affairs Committee. They also address issues 6 and 7 raised by the Economy, Infrastructure and Skills committee. See sections 5 and 6 of this report for details*

## **Welsh Government Response to Other Issues Raised**

- Monitoring
- Consultation and Engagement
- Alignment of Plans
- Use of evidence to inform the draft NDF
- NDF Scrutiny
- Presentation and Structure of the NDF

## **Welsh Government Response - Monitoring**

4.8.21 Responses have identified the importance of monitoring the NDF and the absence of content on this in the draft NDF. Given the importance of the NDF, it is fully agreed that we need to understand how it has been implemented and in particular, the progress it has made towards achieving the NDF Outcomes. We will review the NDF in accordance with the statutory process and it is likely the first NDF review will be undertaken and published 5 years after publication. The review will determine whether progress is being made and what action should be taken to change the NDF if required. Chapter 3 of the NDF has been amended to include an outline of our approach to NDF monitoring and the key questions we will use to help establish whether the NDF has been successful. A NDF Monitoring and Review paper will be published alongside the NDF, setting out in detail the framework for monitoring the NDF.

*The proposed changes address Conclusions 1 and 9 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.*

## Welsh Government Response - Consultation and Engagement

- 4.8.22 Some respondents were critical of the draft NDF consultation and engagement process. Comments included insufficient advertising, lack of engagement with public and local or representative bodies, disingenuous process and the plan was a fait accompli. Positive feedback was also received, both through the consultation and from participants at engagement events
- 4.8.23 A Statement of Public Participation<sup>3</sup> setting out our formal commitment to involving the public was prepared in 2016; it outlines the NDF timetable and methods of engagement to be employed throughout the NDF process. In addition an Engagement Plan has been published to our web site and is updated over time and shows a calendar of meetings, workshops and events that have taken place to up to now.  
[https://gov.wales/sites/default/files/publications/2020-02/national-development-framework-engagement-plan\\_1.pdf](https://gov.wales/sites/default/files/publications/2020-02/national-development-framework-engagement-plan_1.pdf)
- 4.8.24 The draft NDF consultation process was wide ranging and followed the Welsh Governments public consultation guidelines. In addition to the online consultation form a down-loadable form for manual or email return was available. Approximately 1552 groups and individuals (including 83 protected characteristics groups) were contacted directly via our Consultation Database which is open to all and includes statutory and any other interested parties. Easy read versions of the consultation questions were also published.
- 4.8.25 Direct communication took the form of meetings, public drop-in sessions and other stakeholder events which are all set out in the Engagement Plan (see above). Drop in sessions were held across Wales, including Milford Haven, Bangor, Carmarthen, Newport, Newtown, Merthyr, Aberystwyth, Swansea, Wrexham, Llandrindod Wells, Colwyn Bay, and Cardiff. A series of meetings took place with major stakeholder organisations and a number of larger events around Wales were also held.
- 4.8.26 The draft NDF was publicised on the Welsh Government web site, YouTube and Twitter, and included use of the Ministerial Twitter account and stakeholder channels to disseminate information. The draft NDF has also been reported in mainstream online and print news media and professional journals.
- 4.8.27 We have produced a series of resources and toolkits for schools to help young people understand planning, including the National Development Framework.
- 4.8.28 Calls for change to the NDF have been summarised and addressed in the main body of this consultation report. Respondents' main points have been

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<sup>3</sup> <https://gov.wales/national-development-framework-statement-public-participation>

highlighted and discussed in the Welsh Government Response and changes to the draft NDF policy text clearly set out as a result of this process.

#### **Welsh Government Response - Alignment of Plans**

4.8.29 The existence of Local Development Plans across Wales, the introduction of a new national development plan on publication of the NDF and the strong focus on delivering Strategic Development Plans in the future, means there is a significant amount of change to the development planning system in Wales. Over the next decade, areas will move from a position of having one development plan to three. Responses have identified that this change potentially introduces additional complexity into the development planning system and that in the future, the relationship and alignment between plans at different tiers will be a key issue.

4.8.30 Chapter 1 of the NDF will be expanded to include an explanation (and visual models) of how the NDF fits with Planning Policy Wales and the other tiers of the development plan system. The supporting text for draft Policy 16 (now 19) Strategic Policies for Regional Planning has been changed to recognise that the future relationship between SDPs and the NDF is key to aligning the planning system at all levels in delivering the Welsh Government's vision for Wales, and that future NDFs will be informed by SDPs.

The proposed changes address Conclusion 13 from the Climate Change, Environment and Rural Affairs Committee. They also address issue 5 raised by the Economy, Infrastructure and Skills committee. See sections 5 and 6 of this report for details.

#### **Welsh Government response - Use of evidence to inform the draft NDF**

4.8.31 The Welsh Government acknowledges the consultation responses which expressed a need to make available the full range of detail on how the draft NDF was prepared. Preparation of the draft NDF was informed by wider strategies, policies and documents. An [Evidence Compendium](#) and a series of [Explanatory Papers](#) have been published to provide further details on the evidence that has informed the draft NDF. This evidence is readily available to access in the public domain and the Compendium and Explanatory Papers provide clear signposts to its location.

#### **Welsh Government response - NDF Scrutiny**

4.8.32 The Planning (Wales) Act 2015 provides the basis for NDF scrutiny. Part 3 of the Act confirms the draft NDF and consultation report detailing how responses to the draft have been taken into account must be laid before the National Assembly for Wales for its consideration over a period of 60 days when in business. The timetable for NDF preparation is outlined in the [NDF Statement of Public Participation](#) and it confirms the draft will be considered by the Senedd over a 60-day period. It is for the Senedd to determine how the NDF is to be scrutinised during this period.

The response outlined is linked to Conclusion 51 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.

#### **Welsh Government response – Presentation and Structure of the NDF**

4.8.33 It is important to us that the NDF document is attractive, easy to use and easy to understand. We gathered feedback on the presentation of the draft NDF, which was published in multiple formats in print and online, through the formal consultation and informally through conversations with people using the draft NDF.

4.8.34 Overall, the presentation of the draft NDF was well received. People commented that it was a succinct document with a good range of photos from different parts of Wales. We received detailed suggestions on the composition of specific pages in the draft document and ideas for additional photography. On the whole, people understood how the policies and general text related to each other, although there were some pages where this relationship was not quite right.

4.8.35 We have an opportunity to address these suggestions and ensure the published NDF is as well presented as possible. It will contain more maps, charts and photos than the draft NDF, to help illustrate the challenges and trends identified in Chapter 2 and the policies in Chapters 4 and 5. Using photos and charts provides a visual contrast to text, showcases positive examples from across the country and helps make the document more readable. The infographics for each region will be significantly developed and improved. Other adjustments to the final document will include setting no more than one policy per page, to aid the overall clarity of the key messages in the document.

The proposed changes address Conclusion 3 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.

## 4.9 INTEGRATED SUSTAINABILITY ASSESSMENT (ISA)

### *Full response form Question 12*

#### Question 12

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.

Q12.1 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.

#### Question 12 – Main Themes

4.9.1 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment.

Theme	Code	Count
<b>General support</b>	Generally agree with/support the findings of the ISA	<b>11</b>
<b>Consultation</b>	Consultation hasn't been advertised enough/isn't fair/is a fait accompli/decisions have already been made	<b>10</b>
<b>Wind/solar developments</b>	Disagree with use/building of wind turbines	<b>9</b>
<b>Wind/solar developments</b>	Ecological impacts/environmental damage/damage to countryside	<b>9</b>
<b>Wind/solar developments</b>	Concerned about visual impact/ turbines will be too large/introduce buffer zones to reduce visual impact/tourism will be discouraged	<b>8</b>
<b>Additional consideration</b>	Excluding greenbelt/reconsider impact of greenbelts on employment opportunities/housing/economic inclusion/vegetation/flooding	<b>8</b>
<b>Other infrequently mentioned considerations</b>	Take into account Brexit, Nitrate Vulnerable Zones, reducing consumption, population profile changes, heritage, consistency with Wellbeing of Future Generations Act	<b>8</b>
<b>Include indicator/reference /greater emphasis</b>	Climate emergency/safeguarding natural environment/biodiversity/sustainability	<b>7</b>
<b>Consultation</b>	Don't understand what ISA is/how it is relevant/too difficult to interpret/inaccessible	<b>7</b>
<b>Include indicator/reference /greater emphasis</b>	Air quality/air quality monitoring	<b>6</b>

<b>Include indicator/reference /greater emphasis</b>	Tourism	<b>6</b>
<b>Welsh language</b>	Oppose Welsh language proposals/disagree with Welsh medium education	<b>6</b>
<b>Include indicator/reference /greater emphasis</b>	Healthcare	<b>5</b>
<b>Alternatives</b>	Proposals should consider alternatives to onshore wind power e.g. offshore, tidal, bio-mass, nuclear	<b>5</b>
<b>Welsh communities</b>	Better support Welsh communities/Increase or improve development/job opportunities in rural areas e.g. where Welsh speakers live/the areas with most Welsh speakers don't get enough investment	<b>5</b>
<b>Additional consideration</b>	Other assessments e.g. Sustainability Assessment (SA), Strategic Environmental Assessment (SEA), other environmental directives, PPW10, HRA	<b>5</b>
<b>Welsh language</b>	More emphasis on the Welsh language	<b>4</b>
<b>Proposals lack detail</b>	Impact to rural communities	<b>4</b>
<b>Consultation</b>	Consultation should seek the views of industry professionals/specialists/independent inspectors to test soundness	<b>4</b>
<b>General opposition</b>	Generally disagree/proposals are unnecessary	<b>3</b>
<b>Proposals lack detail</b>	(general - non-specific)	<b>3</b>
<b>Proposals lack detail</b>	Housing/housing plans are insufficient	<b>3</b>
<b>Proposals lack detail</b>	Wellbeing	<b>3</b>
<b>Mid and West Wales region</b>	Mid Wales is being ignored/should be more emphasis on my area/NDF doesn't have enough policies aimed at specific area e.g. Welshpool, Powys	<b>3</b>
<b>General support</b>	Generally agree with the principle of sustainability	<b>2</b>
<b>Local democracy/ decision making</b>	Plans oppose local decision making/want local consultation and decision making	<b>2</b>
<b>Include indicator/reference /greater emphasis</b>	Transport/low carbon transport	<b>2</b>
<b>Include indicator/reference /greater emphasis</b>	Care for elderly	<b>2</b>
<b>Include indicator/reference /greater emphasis</b>	Other infrequently mentioned (wellbeing, ERAMMP, education)	<b>2</b>
<b>Consultation</b>	ISA has inaccuracies/omissions	<b>2</b>
<b>Wording</b>	Wording change suggestion	<b>2</b>
<b>Other housing concerns</b>	Concern about impact of housebuilding on community cohesion/crime/plans will make housing crisis worse	<b>2</b>
<b>Criticism of monitoring indicators</b>	E.g. ISA and NDF indicators don't align/don't understand how monitoring indicators were decided	<b>1</b>
<b>Funding</b>	Local councils need more funding/reverse cuts	<b>1</b>
<b>Other (unspecified)</b>		<b>9</b>

## Question 12 – Commentary

4.9.2 The following section is a more detailed commentary on concerns expressed by respondents. It also includes selected quotes from respondents, presented in italic, reinforcing those views.

Among the comments on the Integrated Sustainability Appraisal, there were a group of people who expressed general support for the ISA as a piece of work:

*We support WG in embedding the findings of the report into policy.*

*A thorough piece of work and encouraging to know that policies are constructed within such a broad awareness.*

There were some who expressed concerns about the ISA. One response, submitted by an organisation, detailed worries about the process behind creation of the ISA, asking whether “the 17 objectives (as measures) do capture and ensure the sustainability of the dNDF”. They suggest that weaknesses in the ISA method undermine its conclusions.

*Conclusion 6.1. Table 2.8 (p55) matches NDF policies against the 17 objectives however the scoring depends on aspirational “guesstimates” of the impacts of the dNDF policies and the ability of the NDF policies to achieve the NDF outcomes which makes the entire exercise open to accusations that is both circular and value-laden rather than objective*

Specifically, they were concerned that ISA states that impacts of the NDF spatial strategy on 10 out of the 17 ISA objectives were “more mixed”.

Some respondents problematised the consultation process around ISA and NDF, reflecting concerns raised elsewhere in this report. There was a sense that consultation has not been wide enough and that there was a lack of awareness among people that the consultation was ongoing.

*The report needs better dissemination for non-professionals.*

*...when I speak to people in my locality NO-ONE was aware of the NDF. There was no advertisement, nothing posted on any boards, no leaflet drop, no request for participation within the draft stage and no simplified statement (within the actual localities)...If I am right in thinking you want the ordinary people of Wales to know about this process - which is indeed a political and social one affecting all of our lives - why did I only find out about it by a chance reading in a local rag? If you want a transparent all-inclusive process, why haven't you ensured this happened? At the very least, a simplified ISA should be made available - not just online but in people's letterboxes.*

*What sort of general public promotion did the ISA and the NDF actually have? - Because this is the first we have heard of it, we didn't even know this survey was being carried out until they told us it was closing. It finally made it onto national television, but only due to the disquiet everyone felt about the Welsh landscape being sold-off to build wind farms and the ugly spectre of industrial pylons being raised yet again in mid-Wales.*

The statement that the consultation was easier to access by a professional audience than a lay audience suggests a feeling that strategies for raising awareness among locals without a professional interest might not have been sufficient. While the importance of including professionals in the consultation was acknowledged, the perceived lack of public engagement led to some feeling that the consultation process was disingenuous.

Where people did engage with the consultation, there were some issues with the accessibility of the ISA. Two respondents couldn't work out what the ISA was, merely asking questions to the effect of "what is this?":

*I cannot find anything about the ISA in the National Development Framework document. I'm sure it was important...*

Some respondents seemed to conflate the NDF and the ISA which suggests that there may have been some lack of clarity among respondents as to how the ISA and NDF relate to one another. Others felt that the ISA itself was too dense and technical to access:

*I tried reading it but found it utterly impenetrable ... and I've spent the best part of my career reading and writing such documents*

*At 350 pages, Planning Aid Wales would question the accessibility of this document for members of the public, albeit, the provision of the provision of a non-technical summary is welcomed*

*[Name of organisation] applauds the undertaking of this exhaustive iterative approach however the 350 pages of the stages and suite of tables illustrating the procedure are too extensive and complex for our detailed assessment in this context.*

The organisation who submitted the final response above were concerned that the density of the document may lead to a lack of engagement which, in turn, will mean that "an important overall view of the fitness of the NDF is lost".

Many of those who had accessed the ISA had concerns over its contents, either pointing out omission or suggesting alternative factors that should have been considered by ISA. Some merely stated that they had concerns, others expanded on these worries.

There were some who felt that the ISA lacked detail, with one describing it as "very partial" and another saying that it "does not take on board the view of industry professionals". Another said that there was a lack of clarity on how ISA monitoring indicators and objectives were decided and that there was a lack of rigorous scrutiny and a lack of evidence-base for the status quo (i.e. what would happen if nothing was done). Others suggested that alternative assessments and indicators should be referenced in the ISA, for example: test of soundness; Sustainability Assessment; Strategic Environmental Assessment; Planning Policy Wales 10; other environmental directives. One person suggested that outcomes measures need to give people a voice:

*Outcomes monitoring is all about measuring the changes in people's real lives over time - but it doesn't have to be done through indicators - you can just ask people directly - give them a voice - so ask people how content/happy/satisfied they are with their lives now and ask them again in five years' time.*

Some respondents discussed specific topics in the ISA. One suggestion was that ISA lacked detail on housing. While some of these were mostly sharing thoughts on housing in NDF (e.g.



housing numbers not accounted for; lack of a route map) others also focussed on sustainability and housing as covered in the ISA, with one suggesting the need for it to consider the relationship between air quality and housing development. Another respondent questioned the conclusions of the ISA assessment scoring process relating to the need to “create opportunities for the provision of good quality, safe, affordable housing that meets identified needs”; the respondent suggested that green belts would restrict housing development and exacerbate the housing crisis.

Another concern was that ISA lacked detail on wellbeing. Some just stated this while those that developed their reasoning suggested that not enough connection is made in the ISA between wind farm development and their negative impact on wellbeing through the effects of noise, shadow flicker; visual blight and destruction of green space.

A further concern was a perceived lack of consideration of the natural environment in the ISA. Some felt that the ISA lacked detail on air quality and monitoring air quality. Once again, many people were actually just talking about the NDF proposals, further suggesting some confusion between the NDF and ISA documents. Other people gave examples of where ISA could have improved its consideration of air quality:

*[The respondent refers to paragraph 2.6.10 which talks about the need to better consider and mediate the significant negative effects of P32 and P20 (expansion of Cardiff airport and the Port of Holyhead) on air quality] Confirmation as to what has happened with the recommendation is sought. It is also noted that the need to consider emission contributions is not referenced in the supporting text of Policy 32, which is surely a factor to mitigate this identified environmental impact.*

*It is not clear that this appraisal process clearly and effectively identifies environmental issues, or when it does, this has any impact on the policies drafted. For example the absence of any follow up on the recommendation that the proposals for Cardiff Airport and the Port of Holyhead be subject to more detailed analysis because of significant increases in carbon emissions*

Others felt that there was lack of consideration of ecosystems and biodiversity in the ISA. Again, some of these responses were referring to NDF only but others addressed ISA directly:

*The ISA analysis relies on the incorporation of the HRA which relates only to Natura 2000 sites and Ramsars. These are important but only represent a minute portion of the declining species and habitats at critical risk throughout Wales*

Others felt that the ISA lacked consideration of climate change

*Insufficient reference to a climate change emergency having been declared.  
Insufficient links to a “Prosperity for all: A low carbon wales*

The same organisation who said that it was problematic that impacts of NDF on 10 out of the 17 ISA sustainability objectives would be “mixed”, also identified that many of these 10 targets also related to natural environment and climate which “does not support the ISA conclusion about the sustainability of the NDF”.

One person suggested that ISA should include consideration of low carbon transport and its associated infrastructure in objectives 6 and 8 to help address some of the issues around NDF and the environment / climate change.

A group of responses centred around tourism. None of these address the ISA directly but generally focused their concern on a feeling that NDF fails to protect rural economies as wind turbines will negatively impact on the tourist economy in which they depend. These reflect thoughts developed elsewhere in this summary.

Others pointed out that ISA needed to focus around health and social care. Again, some people focussed on NDF rather than ISA discussing, for example, the need to think about care for the elderly. Two responses talked about these issues in relation to ISA. These concerns focussed on achieving sustainable health services:

*We welcome the inclusion of Objective 2 in the ISA framework which focusses on health, wellbeing and health inequalities and that these have been considered as part of the integrated assessment of the draft NDF...The monitoring dashboard that is developed needs to be drafted with, and linked into, public health and health service policy makers, agencies such as Public Health Wales and providers to ensure that health and inequalities are sufficiently monitored and progress against health and wellbeing outcomes captured.*

*What thought has been given to how the Framework sits with NHS planning, for example, will Health Boards be mandated to ensure all plans are sustainable?... We understand from discussion at an engagement session on the NDF that the Team agreed to discuss with WG Health & Social Services leads to look at how to reflect in NHS planning guidance (not just capital and estates).*

There was a group of responses which focussed on Welsh language and Welsh-speaking communities. Mostly these didn't discuss issues in relation to the ISA and reflected comments on the links between NDF, Welsh and Welsh-speaking communities described in detail elsewhere in this summary (e.g. importance of supporting the Welsh language; the need for Welsh Language Impact Assessment; the need to support rural Welsh-speaking communities through detailed plans for development). One respondent pointed out that ISA suggests impacts of NDF on the Welsh language will be mixed, which isn't reassuring.

Another group of responses focussed on issues concerning the infrastructure for wind and solar energy production. Many of these comments did not mention ISA and echoed comments made elsewhere in this summary (e.g. visual impact; damage to ecosystem; damage to tourist industry; alternative energy solutions should be pursued). However, there were some respondents who did mention ISA in relation to wind and solar energy generation. One person pointed out that NDF's proposals for wind and solar energy generation undermine ISA objectives 2 (to contribute to an improvement in physical, mental and social health and well-being for all...) and 15 (to create the opportunities for the protection and promotion of Welsh culture). It was also pointed out that the ISA suggested NDF impacts on greenhouse gases and energy will be mixed, bringing into question the success of ISA in this area.

A set of responses under the themes *include indicator / reference / greater emphasis: other infrequently mentioned or additional considerations* largely referred to the NDF and included

concerns about: the need to emphasise education (especially in relation to citizenship, awareness of Welsh history, awareness of Wales' global context); addressing divisions exposed by Brexit; protecting the most vulnerable members of society; education as a tool for building tolerance and social cohesion; and the need for a Welsh population growth policy to combat overpopulation.

Within the themes *include indicator / reference / greater emphasis: other infrequently mentioned or additional considerations* there were a set of responses that did discuss ISA. Specific concerns were often only raised once. These included:

- Objective 7 should encourage a strategic approach to assessing and managing flood risks at a catchment scale and delivering growth across local authority boundaries to ensure vulnerable development is in lowest flood risk areas possible; ensure flood risk assessment accounts for the impact of a range of climate change, including a scenario of a 4°C increase by 2100
- Objective 8 should encourage opportunities to reduce air emissions from intensive agriculture
- Objective 9 should encourage a strategic approach to assessing and managing risks to water quality and water resources. - encourage assessment of the impact of a range of climate change on water quality and resources, including a scenario of a 4°C increase by 2100.
- Objective 11 should encourage consideration of the potential of climate change to exacerbate social inequality and address this risk
- Objective 16 should encourage valuation (physical and/or monetary) of natural capital and encourage development to deliver net environmental improvements (i.e. not just ensuing development doesn't cause net damage)
- Objective 17 should encourage reducing amount of waste generated and promote waste processing close to source
- The need for NDF to include issues around flood risk and increased housing development given that these are in ISA
- The need for NDF to include issues around air quality and flood risk and increased housing development given that these are in ISA
- Need to reference nitrate vulnerable zones (NVZ); the effects of nitrates in waterways are readily observable and this a readily measurable indicator. Relevant to ISA objectives 9 and 13
- The significance and extent of the Wales' sea facing border deserves greater significance in terms of its ability to achieve the ISA objectives, particularly objectives 3, 4 and 6 (c.f. National Marine Plan)
- ISA extensively mentions the importance of landscape, including in relation to the SEA Directive and says that landscape considerations have been strengthened. However, this isn't reflected in NDF where landscape is hardly mentioned and there are tensions where "Policy 6 and Policy 11 insist "significant adverse landscape impacts" must be avoided. Policy 10 includes "acceptance of landscape change" in Wind and Solar RE Priority Areas."
- The ISA analysis relies on the incorporation of the HRA but this relates only to Natura 2000 sites and Ramsars which are important but "only represent a minute portion of the declining species and habitats at critical risk throughout Wales".

- *“Even if we accept the scoring in the key Table 2.8, Air quality, Water, Biodiversity and geodiversity, & Natural Resources all score plenty of “minor negative” (pink), some of which should undoubtedly be “strong negative ” (red) had there not been an underlying bias towards positive scores and motive to suppress red scores. The only NDF Policy red score red is the long-term impact of the Development of Holyhead port on Green House Gases and Energy. Many strong positives rely on the “mitigation” of avoiding negative impacts and some of these connections are tenuous”*
- *“The Policy 10 Priority Areas covering 20% of rural Wales scores dark blue: “range of positive and negative outcomes”. The NDF must have regard to Section 6 of the Environment (Wales) Act, which in turn is governed by the UN 1992 Convention on Biological Diversity (EA s6 (a)) which notes that “the fundamental requirement for the conservation of biological diversity is the in-situ conservation of ecosystems and natural habitats and the maintenance and recovery of viable populations of species in their natural surroundings”*
- Concern that the amended ISA (28/8/19) replaced the statement “the NDF seeks to maximise onshore wind and solar energy potential, whilst minimising the potential impact on the most sensitive environmental and cultural assets” with a more bland statement “there is a presumption in favour of large scale onshore wind and solar energy generation potential in the Priority Areas for Renewable Energy, and acceptance of landscape change and a focus on maximising benefits an minimising impacts.” This has removed mention of sensitive environmental and cultural assets.
- *“The NDF is largely a framework for towns and the “rural-proofing” exercise is not convincing. The realities of the rural economic structure is not recognised.”* This is blamed on a lack of inclusion of tourism (fundamental to rural economies) in ISA objectives despite it being mentioned in the broader document.
- The ISAs objectives relate to goals in the Well-being of Future Generations Act but these are not achieved by NDF
- Scoring in relation to green belts and the alternative policy approaches considered in the ISA needs to be reviewed in respect of assessment against ISA objectives 3, 4, 7 and 12. This is in order to recognise that green belts restrict development including housing and that green belts don’t always alleviate flooding
- ISA recommends that NDF could include a greater focus on flood risk but this doesn’t transpire

Finally, some respondents mentioned concerns over the Mid and West Wales region, but they did not specifically talk about the ISA. The same was true where people expressed concerns about local democracy and decision-making being undermined. The points that were raised echoed those elsewhere in this summary document.

## **Welsh Government Response – Integrated Sustainability Assessment**

4.9.3 The comments received on the Integrated Sustainability Appraisal (ISA) have been reviewed and will feed into the review of the NDF and reflected in the amended ISA environmental report; the details of this are set out in Appendix G. The approach taken to the assessment of draft NDF is set out in the

Assessment explanatory paper (<https://gov.wales/assessments-explanatory-paper>).

- 4.9.4 The ISA has followed a prescribed process, as dictated fundamentally by the Strategic Environmental Assessment (SEA) Directive, and shaped by the Well-being of Future Generations Act, but also integrating the requirements of a number of other legislative and non-legislative assessment processes. However, as a national-scale plan, the level of assessment is at a more strategic scale. Regional and locally specific issues will be assessed at the SDP and LDP levels.
- 4.9.5 The statutory process of consultation has been followed with regards to the ISA process. In addition, further consultation events have taken place across Wales, to ensure that as many people as possible have been aware of the process. The NDF and ISA have been shaped and developed using the five ways of working. It is proposed to clarify the assessment process including the five ways of working and the role of stakeholders within the plan and ISA document. There are further details of the consultation and engagement that has informed the NDF on the website: <https://gov.wales/national-development-framework>.
- 4.9.6 The monitoring framework of the ISA will seek to monitor the predicted significant effects of the NDF. This will be closely linked with the NDF monitoring framework.

## 4.10 HABITATS REGULATIONS ASSESSMENT (HRA)

### Full response form Question 13

#### Question 13

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.

Q13 Do you have any comments on the Habitats Regulations Assessment report?

#### Question 13 - Main Consultation Themes

4.10.1 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment.

Theme	Code	Count
Wind/solar developments	Ecological or habitat damage/damage to wildlife e.g. birds	31
General opposition	Disagree with proposals	27
Development	Should protect greenbelt land/development on greenfield sites will impact wildlife habitats	23
General support	Agree with protecting wildlife/habitats/greenbelt land/areas of natural beauty	21
Plans lack detail	E.g. lacking specific detail/evidence base/information on mitigation measurements	14
Conservation areas	Increase the number of conservation areas/area dedicated to conservation/increase interconnected habitats/specific regions should be protected	7
Alternatives	Proposals should consider alternatives to onshore wind power e.g. offshore, tidal, bio-mass, nuclear	5
Consultation	Don't understand what Habitats Regulations Assessment is/how it is relevant	5
Local democracy/ decision making	Plans oppose local decision making/want local consultation and decision making/ability to object to new wind developments/to object on grounds of impact to landscape	3
Consultation	Consultation should seek the views of industry professionals/specialists/independent inspectors to test soundness	2
Plans do not go far enough		1
Other (unspecified)		10

## Question 13 – Commentary

4.10.2 The following section is a more detailed commentary by SRI on concerns expressed by respondents. It also includes selected quotes from respondents, presented in italic, reinforcing those views.

While one person objected to environmental and habitat protection in general, suggesting that the money would be better spent on people by investing in education or health, all other respondents agreed that habitat protection is important.

There were some who said that they agreed with habitat protection but who didn't mention the HRA report. Many of these said that such protection is "vital" with one person saying, "*I don't consider that it goes far enough in protecting all species . . . including humans!*". Others pointed out the importance of ensuring that the outlined planned protections are implemented. One person suggested the HRA needs to be better worded:

*The wording of the HRA places only an indicative or suggested responsibility for complying with it. Current planning policy is more definitive in its wording.*

There were concerns about the consultation process. Several people said that they couldn't find the HRA, or if they had looked at it, they had found the document inaccessible:

*What the hell is this [the HRA]?*

*It makes no sense to me.*

*It is hard to comment on this as it is lengthy and confusing.*

Some said that insufficient insight has been sought from experts and organisations such as Welsh Wildlife Trusts; the Wales Ornithological Society and Wales RSPB. Too much input from Natural Resources Wales into HRA was questioned as they are a Welsh Government Sponsored Body. People seemed to focus more on NDF when discussing the consultation process with one respondent saying:

*The evidence base put forward as part of this consultation falls a long way short of what would be expected of a document that will form part of the statutory development plan.*

Some said that the HRA lacked detail with one saying "*the HRA is inaccurate and far from complete*". Some didn't say what detail they thought it was missing. One person suggested that the availability of a Wildlife Sensitivity Mapping tool in Wales would help add more robust and comprehensive detail, adding that there appears to be no coherent strategy for protecting birds and bats outside of the protected areas. This was echoed by another respondent who said the strategy needs to consider areas beyond the designated protected sites and also consider corridors of connection between important areas for biodiversity.

There was another group of suggestions for extending definitions of areas that should be protected with ideas including: a national forest; Clwydian Range and Dee Valley AONB; Coed Cilygroeslwyd SSSI nature reserves; Graig Wylt; Eyarth Rocks butterfly reserve; Pembrokeshire Bat Sites as primary feature of Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation (SAC); Cwm y Wydden nature reserve; Kenfig Hill; Carmarthen Bay Dunes SAC; and North Pembrokeshire Woodlands SAC. One respondent suggested that

HRA has failed to acknowledge that NDF would be hard to implement in Carmarthen Bay & Estuaries European Marine Site.

One respondent expressed a concern that the HRA document was separate to the NDF document. The reason for this was that as any development plans will “need to take into account the HRA of the NDF to ensure the mitigation measures are adequately covered.” They pointed out that in the LDP process, mitigation measures have to be set out in the development plan and it should be the same in NDF.

One respondent said that HRA needed to consider impacts arising from the Wales Infrastructure Investment Plan.

A few respondents mentioned issues of local democracy but did not focus on HRA. Instead, they raised concerns that Welsh Government will be able to “*override local democracy and concerns*” as they aim to generate renewable energy. This was seen to be at the expense of local communities. These echo concerns about local democracy discussed in detail elsewhere in this summary.

Another group of responses are themed *development*. Most of these were comments about specific sites as discussed above, or about the impact of renewable energy developments. Of the HRA, one person said:

*...the presumption should be in favour of no development in these special wild places and unique habitats rather than 'mitigating' the impact of development*

A group of responses discussed the issue of renewable energy development. As in responses to question 19, lots of these responses were general thoughts about renewable energy infrastructure that resonate with themes more fully developed elsewhere in this summary. However, there were some who related this to HRA. The main argument was that HRA, with its focus on habitat protection, contradicts NDFs focus on developing wind and solar energy infrastructure which will destroy habitats. For example:

*In the Rhiew Valley, part of the catchily named “Priority Area 5” where there would be a presumption in favour of windfarm development and an “acceptance of landscape change” lies Cwm y Wydden Nature Reserve, the only known Welsh site for the insect *Pseudopomyza atrimana*. Migrant birds like the Pied Flycatcher or Wood Warbler which frequent the site would be at risk from the blades, as would all the bats, Red Kites, Grey Heron, curlew etc. etc.*

Another point made was that animals (e.g. birds) do not recognise or adhere to human boundaries which undermines the usefulness of HRA in designating Priority Areas:

*P10 of the report claims that the priority areas for additional wind farms have avoided Natura 2000/Ramsar sites and National Parks and ANOB's and have therefore protected the wildlife. Unfortunately upland birds have not yet been able to distinguish between these sites and the priority areas. The red kite that is protected over the National Park can be cut to pieces a few minutes later by flying through a wind turbine on the priority area. The conclusion of P10 is therefore not relevant to the protection of upland birds*

For some, these issues undermine the usefulness of HRA:



*There is no mention of the damage to our wildlife, particularly upland birds, in the HRA which will be caused if more wind farms are allowed on our uplands. The HRA is therefore of no value to the Framework.*

## **Welsh Government Response – Habitats Regulations Assessment**

- 4.10.3 The comments received on the Habitats Regulations Assessment (HRA) have been reviewed and will be fed into the review of the amended NDF and documented within the updated HRA report.
- 4.10.4 The HRA conforms to the Conservation of Habitats and Species Regulations 2017 and has addressed recent case law. It assesses the impacts of the NDF only on Natura 2000 sites, which are protected by EU Law or treated as such through government policy. These are Special Areas of Conservation (SACs), Special Protection Areas (SPAs), as well as candidate and potential SACs and SPAs, and Ramsar sites. The HRA seeks to ensure that the NDF will not result in a likely significant effect on any Natura 2000 site.
- 4.10.5 There have been a number of consultations on the HRA alongside the ISA and a number of consultation events have taken place across Wales, to ensure that as many people as possible have been aware of the process. Officials have also undertaken engagement with stakeholders such as NRW and RSPB as this work has emerged. There are further details of the consultation and engagement that has informed the NDF on the website: <https://gov.wales/national-development-framework>.
- 4.10.6 The wider biodiversity impacts are assessed within the ISA and the results of the HRA Screening will be integrated into the ISA where appropriate, as part of an iterative process.

**The proposed changes address Conclusion 46 from the Climate Change, Environment and Rural Affairs Committee. See section 5 of this report for details.**

## 4.11 IMPACTS ON THE WELSH LANGUAGE

### *Full response form Question 14*

#### Question 14

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.

Q14.1 What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Q14.2 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.

#### Question 14.1 - Main Consultation Themes

Theme	Code	Count
<b>General support</b>	Agree that Welsh language should be considered/feel learning/use of Welsh language should be encouraged	<b>27</b>
<b>General opposition</b>	Disagree with Welsh language prioritisation/Welsh language not important/feel Welsh language is forced on non-Welsh speakers/is discriminatory	<b>18</b>
<b>Economy/employment</b>	Welsh/encouraging Welsh speakers is good for employment opportunities	<b>14</b>
<b>Equal importance</b>	Both English and Welsh should be treated with equal importance/no less favourably	<b>11</b>
<b>Learning Welsh</b>	Encourage Welsh learning in the workplace/adopting bi-lingual resources at work	<b>9</b>
<b>NDF</b>	NDF will have no impact/unsure how NDF could have impact on Welsh language/Welsh language use and planning aren't related	<b>9</b>
<b>Lacks detail</b>	Plans lack detail/can't tell how Welsh will be affected	<b>9</b>
<b>Status quo</b>	Existing Welsh language policies should remain/existing Welsh opportunities are good/thought this was in place already	<b>9</b>
<b>Funding</b>	Welsh language proposals are expensive/a burden on the public sector	<b>8</b>

<b>NDF</b>	NDF will negatively affect Welsh speakers disproportionately e.g. due to regional policies	<b>6</b>
<b>Schools</b>	Provide more Welsh-medium schools/more funding for them/improve Welsh teaching in schools	<b>5</b>
<b>Welsh communities</b>	Better support Welsh communities/Increase or improve development/job opportunities in rural areas e.g. where Welsh speakers live/the areas with most Welsh speakers don't get enough investment	<b>5</b>
<b>NDF</b>	NDF will have positive impact on Welsh language/will create opportunities for use of Welsh (non-specific)/improved connectivity	<b>5</b>
<b>Learning Welsh</b>	NDF should include access to free/subsidised Welsh lessons/teach Welsh schemes/free online resources	<b>3</b>
<b>Economy/employment</b>	Proposals for Welsh language makes setting up businesses in Wales less attractive/will negatively affect the Welsh economy	<b>3</b>
<b>Learning Welsh</b>	Take a soft touch approach/don't regulate Welsh language learning/it can be off putting/ counterproductive	<b>2</b>
<b>Learning Welsh</b>	Make learning Welsh enjoyable	<b>2</b>
<b>Learning Welsh</b>	Offer opportunities to learn Welsh throughout the UK	<b>2</b>
<b>Environment</b>	Having all publications in Welsh and English bad for the environment	<b>1</b>
<b>Welsh communities</b>	Use/increase the use of Welsh language impact assessments	<b>1</b>
<i>Other (unspecified)</i>		<b>8</b>

### Question 14.1 Commentary

4.11.1 The following section is a more detailed commentary on concerns expressed by respondents. It also includes selected quotes from respondents, presented in italic, reinforcing those views.

This question asked respondents to consider the effects that NDF would have on the Welsh language.

There was a group of responses which can be classified as broad statements about attitudes to the Welsh language in general. Within this group, there were some who are opposed to the use of Welsh as a matter of principle. Some of these were just statements of objection:

*I don't speak Welsh and don't think it is necessary to speak Welsh*

Others stated their opinion with more reasoning:

*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 children's ability to converse in English and disproportionately impacted one part of the community. It also penalised those with special educational needs.*

There were more people who were supportive of the Welsh language in principle for a wide range of reasons.

*The benefits of being bilingual I think are fantastic*

*The language has to be used, otherwise it will die*

*The benefits of bilingualism are well known but there is also the issue of national pride and the ridiculous stigma that still exists against the Welsh language*

*The Welsh Language is an important part of our national identity and something unique that is attractive both within Wales and looking into Wales from outside.*

There was another group of responses that emphasised the feeling that Welsh and English were equally important and should be treated equally.

*Access to employment for Welsh and English first language speakers must be equitable – it should be illegal to weight one or the other as a requirement of employment.*

*The English language is essential in the international community and should therefore have no less priority than Welsh in education and public services in Wales. No one should be disadvantaged through lack of fluency in either language.*

Beyond these general positioning statements, there were respondents who reflected more fully on the effects that NDF might have on the Welsh language. The effects that people felt NDF might have on the Welsh language can be broadly summarised into: negative impacts; positive impacts and no impact.

A few people felt that NDF would have **negative impacts** on the Welsh language. Reasons for this mostly revolved around a feeling that the rural areas are the Welsh language “heartlands” where farming and wider rural communities play a key role in sustaining the Welsh language. As outlined elsewhere, NDF was seen to have the potential to negatively and disproportionately impact on these rural communities, either by its action (e.g. wind turbines impacting on agriculture and tourism) or its inaction (e.g. failure to provide plans for some of these areas). Consequently, it was felt that NDF would impact negatively on the Welsh language.

*The policy will not support the Welsh language in areas where it is becoming weaker due to lack of plans for areas such as Gwynedd, Ceredigion and Carmarthenshire.*

*Farming communities in rural Wales are key to preserving the Welsh language and fostering its development. Regrettably the siting of "solar farms" in areas such as Priority Area 13 will irreparably harm the Welsh language as they will disrupt normal farming practices (which are predominantly conducted in the Welsh language) and solar farms are constructed and managed often by foreign companies (non-Welsh speaking)*

A few people felt that NDF will have a **positive effect** on the Welsh language. A company who responded suggested that infrastructure improvements suggested by the NDF could have a positive effect on Welsh language:

*We welcome the NDF's consideration on the effects it will have on the Welsh language and envisage that a well-developed infrastructure network with improved connectivity will have a positive effect.*

Others suggested ways in which NDF could have a greater positive effect. One suggestion was that within the NDF, predominantly Welsh speaking areas should be given special status and that a study should evaluate what planning conditions might allow the Welsh language to thrive.

*In terms of mitigation or enhancing positive effects, there will need to be an assessment of the impact of the following on Welsh language arising from the NDF policy areas related to:*

- *Population and demographics including new migration flows*
- *Quality of Life indicators including those measures relating to health and wellbeing and the environment*
- *Economic development*
- *Physical and social infra-structure development*
- *Social and cultural schemes*

Several people discussed the need for NDF to focus on appropriate investment to support the economies of Welsh speaking communities.

*Develop the economy to ensure a firm footing for Welsh-speaking communities. The importance of sustaining and growing communities with a high density of Welsh speakers has already been noted. It is important for several reasons. These communities contain the higher percentages of Welsh speakers who describe themselves as fluent speakers as well as higher percentages of speakers using the language most frequently. While each community is unique, there are some common characteristics to these communities. They include high population mobility – young Welsh speakers leaving, and an influx of mainly older people... We want to see good jobs that enable young people to remain or, if they leave for different life experiences, to return to these areas to live and raise a family. We need more than employment to keep people in these areas, and to attract them back.*

Another said that NDF could do more to promote Welsh language:

*The NDF should promote the use of the language in the all sectors, and in the historic environment, bilingual information at all contact points. This also provides understanding of the origins and roots of the nation's history, supporting distinctive culture, and sense of place and belonging.*

Another response pointed out the, given the focus of the Well-being of Future Generations Act on a vibrant Welsh culture with a thriving Welsh language, the NDF should more clearly direct this vision within the 33 identified policy areas.

There was another group of people who said that NDF would have **no impact** on the Welsh language. Some made general statements that they could not see how development, or the planning system, could impact on Welsh language, with one respondent saying that Welsh language strategy should not be part of a national level development plan. Others said that there was no need for NDF to address Welsh language issues as appropriate strategies and policies were already in place. There was also a suggestion that the NDF lacks detail of how to achieve Welsh language and that more guidance was necessary:

*We support the positive and ambitious aims outlined in Outcome 4 in respect of the Welsh language, and in particular welcome the recognition given to the importance of providing jobs and homes to support the language in Welsh speaking communities. However, it is not clear whether outcome 4 alone will have a positive impact upon the Welsh language given that there is no other guidance within the document to build upon the outcome...It is presumably considered a matter for LDPs to consider how the*

*land use planning system can support the Welsh language. It will therefore be entirely down to the content of respective LDPs to deliver on the NDF's outcome. However, given that the growth of the Welsh language is one of the outcomes of the NDF and that its importance has been acknowledged in respect of all three regions, we consider that it should be categorised as a strategic matter of national importance and further elaboration and guidance through a policy should be provided.*

*The document does not set out clearly how it is likely to impact on the Welsh Language and how such effects have been mitigated.*

A group of responses discussed issues around Welsh and the economy/workplace and showed two contradicting opinions about the extent to which Welsh benefits the Welsh economy. One set of responses suggested that encouraging Welsh speaking was good for the economy. The reasons for this tend not to be well developed but there is some suggestion of the importance of upskilling individuals, both in Welsh and in other language and transferable skills in order to help them bring value to Welsh companies. One suggestion is that in order for the Welsh language to benefit the Welsh economy, everyone needs to invest in it (all companies; education; health etc). Another response suggested that given the link between planning, the economy and Welsh communities, it is essential for Welsh language to permeate NDF:

*Recognizing the relationship between the planning system and the economy in ensuring the viability of Welsh speaking communities, this vision and the prosperity of the Welsh language should permeate all areas of this policy document.*

Alternative ideas suggested some concern that “forcing” Welsh onto Welsh businesses might alienate non-Welsh business investing in Wales.

*The NDF is unlikely to have any effect on the use of the Welsh language or the use of any other language currently spoken in Wales. Welsh Government however is constantly trying to attract inward investment from overseas. Use of the Welsh language in these circumstances is likely to have a negative effect.*

There was also a focus on teaching and learning Welsh with suggestions around Welsh education covering a range of ideas.

Some respondents focused on the teaching and learning of Welsh in schools. Some had negative attitudes towards the teaching of Welsh in schools. One perspective was that Welsh should not be taught in every school in Wales; another perspective was that it Welsh should not be taught in any school in Wales.

*I am a Welsh speaker but some aspects of policy are driven by ideology and not reality i.e. the current policy of compulsory Welsh learning in Primary education, this means less time is spent on other subjects this can be disadvantageous.*

*Welsh is not the primary language in all regions and so I do not agree with plans to force it upon all areas. Imposing this will produce more negative feelings towards the WAG and Welsh language.*

Others had positive attitudes towards teaching Welsh in schools, feeling that Welsh should be taught in all schools in Wales. Of these respondents, some suggested the need for better or more ambitious teaching of Welsh as a subject within the curriculum. Others suggested a need for more funding to build more Welsh medium schools.

*Welsh education needs to be more ambitious moving more schools towards category 1 level.*

*Welsh was never on the curriculum when I was in school and I still think it needs to be taught better in schools.*

One person suggested the need for better technical education in Welsh, highlighting a link between education and employment opportunity:

*Technical education opportunities in Welsh and technical employment opportunities in rural Welsh speaking areas are very important to keep young people in an area and ensure it remains sustainable.*

Others focussed on access to teaching Welsh language skills in non-school contexts. There was a feeling that workplaces had a role to play in teaching Welsh. There was also a suggestion that Welsh Government should provide free education in Welsh language skills in all communities across Wales.

*I think it should be made easier to learn Welsh. And not cost anything.*

*It should be more that you are given [the] opportunity [to] learn in the workplace ...it would be better to encourage learning from the workplace to increase the use of Welsh.*

*Welsh should be taught in all schools and free Welsh learning opportunities should be provided in every community.*

In terms of Welsh language, some felt that it was important to make learning Welsh enjoyable in whatever context it is learned. One response suggested that Welsh language basics are taught across the UK.

Another focus around Welsh language was on the relationship between Welsh language skills and the workplace. There was some feeling that Welsh Government should increase the use of Welsh in the workplace, either through encouragement or if that doesn't work, through legislation. Someone suggested that this should include encouragement to develop bilingual materials and that grants should be made to support this requirement financially. Another respondent echoed a point made above about the links between technical Welsh language teaching and the availability of technical Welsh language jobs:

*Support for developments that will provide good well paid employment in areas with significant numbers of Welsh speakers should be encouraged. The SMR proposals at Trawsfynydd and continued investment at Llanbedr Airfield should be actively supported.*

Other people highlighted issues that they felt arose from the requirement to allow for the Welsh language in the workplace and beyond. One person was concerned about the impacts on a business where someone "could insist on the right to be spoken to in Welsh in a predominantly English-speaking business". More people were concerned with the costs and logistics associated with bilingualism, whether in a business, public sector or further (e.g. road signs). Concerns were mostly about the cost and/or environmental impacts of producing things twice, especially given the current state of both the economy and the climate.

*In this climate obsessed world I do often ponder what the carbon footprint is from effectively duplicating every piece of literature.*

*The cost of supporting a bilingual state is a significant burden to business and taxpayer alike. It should be a personal choice and not a state policy.*

*I am in favour of the use of the Welsh language but think that we have more important things to spend money on currently than promoting the Welsh language. I am therefore not in favour of any money being currently spent on promoting the Welsh language. We should channel money into climate change crisis 1st.*

Others noted the importance of bilingual material as part of Welsh language provision. Some recognised that this incurred a financial cost that maybe Welsh Government should subsidise (see above).

#### **Question 14.2 - Main Themes**

4.11.2 The table below sets out the main concerns of respondents expressed by theme, together with the number of respondents making that comment. It covers question 14.2.

<b>Theme</b>	<b>Code</b>	<b>Count</b>
<b>Welsh communities</b>	Better support Welsh communities/Increase or improve development/job opportunities in rural areas e.g. where Welsh speakers live/the areas with most Welsh speakers don't get enough investment	<b>15</b>
<b>General opposition</b>	Disagree with Welsh language prioritisation/feel Welsh language is forced on non-Welsh speakers/is discriminatory	<b>10</b>
<b>Learning Welsh</b>	NDF should include access to free/subsidised Welsh lessons/teach Welsh schemes/free online resources	<b>10</b>
<b>General support</b>	Agree with Welsh language proposals/feel learning/use of Welsh language should be encouraged	<b>8</b>
<b>Equal importance</b>	Both English and Welsh should be treated with equal importance/no less favourably	<b>7</b>
<b>Economy/employment</b>	Encourage Welsh learning in the workplace	<b>6</b>
<b>Legislation</b>	Need to ensure legislation is put into practice	<b>6</b>
<b>Learning Welsh</b>	Make learning Welsh enjoyable	<b>5</b>
<b>Welsh communities</b>	Use/increase the use of Welsh language impact assessments	<b>5</b>
<b>Status quo</b>	Existing Welsh language policies should remain/existing Welsh opportunities are good	<b>4</b>
<b>Learning Welsh</b>	Take a soft touch approach/don't regulate Welsh language learning/it can be off putting/ counterproductive	<b>3</b>
<b>Funding</b>	Disagree with Welsh provision - funding should be withdrawn/reduced e.g. Welsh Medium schools	<b>2</b>
<b>Economy/employment</b>	Proposals for Welsh language makes setting up businesses in Wales less attractive/will negatively affect the Welsh economy	<b>2</b>
<b>NDF</b>	NDF will have positive impact on Welsh language/will create opportunities for use of Welsh (nonspecific)/improved connectivity	<b>1</b>
<b>Viability</b>	Don't believe increase in Welsh speakers is achievable/is unrealistic	<b>1</b>
<b>Plans lack details</b>	Maps	<b>1</b>



**Question 14.2 Commentary**

Question 14.1 asked about the effects NDF in its current, draft, form might have on the Welsh language. This question asked people to consider how the NDF could be formulated to better impact on (a) opportunities for people to use the Welsh language and (b) ensuring equality between English and Welsh languages. People were asked to consider how NDF might be changed to ensure either positive impact or ensure there are no adverse impacts on either of these outcomes. It is worth noting that, given the proximity of these two questions on the consultation document, both under the heading “Welsh Language”, sometimes the answers overlapped.

As before, there were some who are opposed to the use of Welsh as a matter of principle. However, this question produced fewer broad statements about attitudes to the Welsh language with responses more focussed on policy. There was one suggestion that Welsh language targets are unrealistic

*...increasing Welsh speakers by 80% was considered unrealistic and over ambitious.*

There was also some suggestion that Welsh policy relating to Welsh language either did not need to be changed or that policy should not interfere with language choice. However, this summary focuses on responses that addressed the questions asked.

**Ensuring equality between Welsh and English languages**

Most responses focussed on how equality between Welsh and English could be achieved.

There were a small number of respondents who felt that equality between English and Welsh was unnecessary. This was usually expressed as people feeling that only one of the languages is important or necessary. Some people felt that English was the only language that was important, while others felt that it was Welsh.

Sometimes people took one of these positions with no rationale as to why they felt that way. In other cases, a reason was given (e.g. a reaction to perceived aggression to non-Welsh speakers; Welsh as the historical language of Wales). One example was Welsh being described as a “bonus” language, this being indicative of a position where English is normalised as the primary language of Wales. It could be argued that all these positions are, in themselves, indicative of inequality existing between the languages.

For many, achieving equality of Welsh and English was important, both in general and as something that the NDF should address:

*Neither language should be used less favourably than the other, both are of equal importance. Any other interpretation could be seen to be discriminatory. The NDF should not contain any text that suggests otherwise.*

Various suggestions were made as to how this equality could be achieved. Not all of these suggestions specifically related to the NDF but many did.

Some felt that English was the language that is at a disadvantage in Wales. There was the suggestion that this disadvantage might impact on outcomes of the NDF.

*At present there seems to be adverse effects on the non-Welsh speakers as there is now positive discrimination in some parts of Wales if Welsh is not spoken. This will ultimately affect employment and the recruitment of the best skills from the market place and may well jeopardise the Welsh economy in the long-term contrary to the aims of the NDF.*

However, most responses suggested that it was Welsh that is the language whose status needs to be raised in order to achieve parity. It is these suggestions that will be discussed now.

For some, schools were seen as key to promoting use of the Welsh language in order that its status is raised to equal that of English.

*A policy that focuses attention on the very young /pre-school is the way forward as infants need to be steeped in the Welsh Language at an early age.*

Some highlighted the importance of Welsh on the curriculum of English medium schools. An alternative suggestion was the need for more Welsh medium schools, particularly in new developments in primarily Welsh speaking areas.

Some suggested that workplace practice is key to ensuring the equality of English and Welsh. Open ended responses to this question weren't as well developed as responses about Welsh and the workplace for question 21 meaning that there was more discussion of the issues raised by Welsh language for the workplace than there were suggestions as to how this could be changed. Some concerns were raised around the need to embed training and Welsh speaking in Welsh workplaces and the difficulties of this given the context of a broader economy that doesn't operate in Welsh. One respondent focused on the importance of recruiting people to jobs on the basis that they are required to learn Welsh. This person suggests that often this doesn't happen after recruitment and, where a company sponsors someone to learn Welsh, their proficiency should be monitored to ensure they hit the minimum standard in the time frame required.

Some suggested that in order to engage non-Welsh speakers, promotion needed to be broader in scope, engaging non-Welsh speakers into the culture of the language as well as the language itself.

*People who don't speak Welsh, especially those who have moved into Wales don't understand the importance of the language culturally and socially and politically - this needs to change - only then will they become favourable towards it and even PROUD of it. Lots more money is needed to help this group really VALUE the language and support it*

Another argument was that the Welsh and English would only have equal status if this outcome and strategies to achieve it are embedded in law. Echoing points made about the cultural significance of the Welsh language, one person suggested that Welsh Government needed an individual policy on language and culture.

There was discussion around the importance of recognising that NDF does not operate in isolation from other policy and that acting on this would strengthen language equality between Welsh and English. Raising the status of Welsh necessitates a joined-up approach where Welsh language concerns runs throughout Welsh Government policy:

*Welsh Government policies in all aspects of development have an impact on the position of the Welsh language in the community. Therefore, the prosperity of the Welsh language in the community must be placed at the very beginning of the process of formulating Welsh Government policies, strategies and plans in each department, rather than adding the Welsh language as an appendix during the process or at the end. If the Government really wants to ensure the survival and prosperity of the Welsh language, then it must be ensured that the policies of every field - education, employment, housing, etc. - aim specifically at stabilizing and strengthening the Welsh language as a living community language.*

Emphasising the fact that Welsh strategy needs to be in place across the education, health and care sectors, another respondent gives an example of why it is important NDF should consider Welsh language issues in relation to these sectors:

*...this is a basic human right, to be able to communicate in your mother tongue when you're in a position of need or in a fragile state. There will be added stress involved for an individual having to resort to a second language when required to explain their concerns/symptoms/ ailments, and this is especially problematic when dealing with children, those suffering with mental health or dementia and too many of our older Welsh-speaking generation are living in residential homes without care provided in Welsh or an opportunity for them to use the language on an everyday basis."*

Someone else suggested that NDF needs to strengthen issues raised by Welsh Government's 2050 Welsh Language Strategy. In particular, the Welsh Language Strategy calls for language planning and development to work together to produce Welsh-speaking communities that are "economically and linguistically viable". In this way, both the use of Welsh, and its status, will be raised. Another respondent suggested that designation of "areas of linguistic sensitivity" would protect the linguistic landscape in the same way as AONBs and national parks protect the physical landscape. These would be:

*Areas where development would occur, and might in fact be encouraged, but in a way which is sensitive to the maintenance of Welsh as a community language and for which particular public policy interventions might be required.*

Others said that the NDF needs to provide more guidance for raising the status of Welsh.

Just as there is a suggestion that Welsh should underlie all Welsh Government policy, there was also a suggestion that Welsh language should be integrated into all NDF policy and outcomes:

*The impact on the Welsh language and the need to consider how the plans work in favour of the Welsh language must be highlighted through the entire document in order to ensure that there is a relationship between each change and policy in the NDF and a positive impact on the language and community well-being.*

*Contributors responding to these questions agreed that references to the Welsh language should be strengthened throughout the draft NDF. Both the Welsh Government's Welsh Language Strategy and the Well-being goals under the Well-being of Future Generations (Wales) Act acknowledge the importance of the social use of the Welsh language.*

There is some concern that the NDF does not explicitly link the Welsh language to economic development. Given that NDF is a strategy document given a spatial context for development, this suggests a fear that Welsh language considerations are being written out of development processes and that Welsh will suffer as a consequence. One respondent highlighted the need for NDF to allow for local consideration of policy impact on Welsh language and the need for Welsh Language Impact Assessment:

*We consider that clearer and stronger compatible guidance through PPW and TAN20 would assist Local Planning Authorities to develop robust LDP strategies which can positively contribute towards creating opportunities for the Welsh language to develop and thrive. Of specific assistance would be examples of best practice in terms of assessing the impacts of local plans on the Welsh language and the provision of a standardised Welsh Language Impact Assessment methodology.*

It was suggested that Welsh Language Impact Assessments should be done by one body, possibly the Welsh Language Commissioner.

A related suggestion, as in question 21, is the importance of NDF in investing appropriately in order to sustain and ensure the development and survival of communities where Welsh is spoken.

*[Organisation name] would like to see recognition within the NDF that supporting rural communities has a positive effect on the use of the Welsh language.*

As an example of Welsh language considerations not being made, there was concern that some of the Welsh “heartlands” were not mentioned in the document (e.g. Meirionnydd, Ceredigion and Carmarthenshire). There was a fear that this meant that they will be not developed and could decline, taking the Welsh language with them. Another suggestion was that Welsh names should be used in all new developments.

### **Opportunities for people to use the Welsh language**

There was less direct discussion as to how NDF can create opportunity for people to use Welsh. However, most respondents felt that Welsh was disadvantaged through NDF and there was a sense that increasing the equality of Welsh so that it has parity with English would lead to more opportunities for people to use Welsh.

For some, opportunity was about holistic investment in a system of practices and technologies that facilitated the use of Welsh:

*Rhoi yr un hawl i bobl gael defnyddio Y Gymraeg yn gyfartal a'r Saesneg. Rhaid buddsoddi mewn technoleg, addysg a mewn cymunedau lle mae'r Gymraeg yn bodoli ac yn cael eu defnyddio gan rannu ymarfer da (Give people the same right to use Welsh equally with English. There is a need to invest in technology, education and in communities where the Welsh language exists and is used, sharing good practice).*

For one respondent, this system included the importance of bilingual signage for increasing the use of Welsh.

It was pointed out that the opportunity to speak Welsh is greater in Welsh speaking communities. This suggests an even greater emphasis on various calls made for investment in sustaining Welsh-speaking communities as “the higher the number of speakers living in a

geographical area, the higher the probability of opportunities being available to them to use the language in day-to-day communication". For one respondent, this suggests a key process that should be undertaken in order that NDF better plans for such communities:

*[Organisation name] considers that more effort should have been placed on spatial analysis to establish a mechanism that would be resilient across Wales and for large and small scale communities to identify areas with significant potential for language growth and areas of significant sensitivity, based on a combination of numbers and of percentages Improved support / safeguarding for farming would encourage safeguarding of the language.*

Finally, there was a focus on teaching and learning activity in order to increase opportunity to use Welsh. This is both because it raises skills and confidence in using Welsh as well as being an opportunity to use Welsh in itself. Suggestions for teaching and learning Welsh included: schools; communities; workplaces; free online resources for learning language and culture (funded by Welsh Government); publicise and support the Say Something in Welsh campaign; do more to enable people who live in the rest of the UK to respect and value Welsh (marketing campaign); free, extensive, comprehensive and well publicised "teach Welsh" programme using TV, internet and face to face classes; and provision for government subsidized courses to encourage tuition in verbal and written Welsh in South East Wales.

### **Standardised Submission**

15 individuals submitted responses detailing concerns about the impact to the Welsh language. Specifically, the proposed three regions being unsuited due to a variety of criteria; the risk of overdevelopment of Carmarthenshire, the north-west and north-east; and the encouragement of inward and outward migration through west to east rather than north to south transport links. The submission strongly opposed non-elected members on SDP committees, the enforcement of SDPs, and designating specific areas as areas for growth. The submission suggested a specific policy to increase the numbers of primarily Welsh speaking communities, re-use existing housing stock and re-opening Carmarthen-Aberystwyth railway.

### **Welsh Government Response – Impacts on the Welsh language**

4.11.3 Only a small number of the responses addressed the question by providing feedback on the likely effect of the NDF on the Welsh language and suggesting how to enhance the positive effects. The concerns regarding the impact of an urban-focussed spatial strategy on rural communities, including many which are in strongly Welsh speaking areas, should be alleviated by the enhanced consideration of rural issues being proposed. An additional policy on the rural economy (see paragraph 4.2.46) and the recognition of Mid Wales as its own region (see paragraph 4.7.51) are important proposed changes that demonstrate our commitment to sustainable rural development.

4.11.4 A lack of focus on transport issues was also raised as a factor that could affect Welsh speaking communities; the new proposed policies on national and regional connectivity in particular should provide clear benefits to communities in all parts of Wales (see paragraph 4.8.10). Enhanced connectivity and investment in regional and local transport infrastructure will

enhance the competitiveness of businesses, enabling employment growth and better access to services. These improvements can benefit all communities, and could particularly support the rural economy, which is important to many Welsh speaking communities.

4.11.5 There was concern that although the NDF set a positive example of considering the language through a clear and specific NDF Outcome, that delivery would be entirely reliant on Strategic and Local Development Plans. The lack of a specific policy on the Welsh language in the NDF was also seen as a weakness. Our view is that the Welsh language is a thread through all aspects of the NDF, along with the other well-being goals. The Welsh language is not a land-use or an issue to be considered in isolation, therefore it is most appropriately covered by integrating it into the overall strategy of the plan. We have sought to more clearly demonstrate the approach taken through a contextual model in Chapter 1, revisions to Outcome 4 and enhanced references to the language in each regional section.

4.11.6 The NDF, and other tiers of the development plan, can enhance the wellbeing of the language by developing spatial strategies that help ensure the right developments take place in the right places. This can be more effective than policies which say positive things about the language but ultimately lack effect. The growth areas identified in the draft NDF included places with a significant number and/or percentage of Welsh speakers, including Cardiff, Swansea Bay and Llanelli, Wrexham and Deeside, Carmarthen, Aberystwyth, Bangor and Caernarfon; the vision for growth and development in these places explicitly took into account their importance as centres of Welsh language life and culture. We propose the revised NDF will also identify the Teifi Valley as a Regional Growth Area. This is another area where the language is central to communities and an appropriate scale and distribution of growth in the area can help sustain and grow the Welsh speaking communities in the area. Strategic and Local Development Plans will be tasked with ensuring detailed policies and development proposals recognise and reflect the various growth areas' importance to the Welsh language.

The proposed changes address Conclusion 8 from the Climate Change, Environment and Rural Affairs Committee. See section 5.

**5. Climate Change, Environment and Rural Affairs Committee (CCERA) report**  
**Welsh Government response to [report](#) dated December 2019**

Conclusion	Response
<p><b>Conclusion 1.</b> The Welsh Government must use the NDF outcomes to articulate a bolder long-term vision. The national dimension of strategy needs to be more fully developed.</p>	<p><b>Accept</b></p> <p>The Introductory chapters of the NDF, up to and including the NDF Outcomes, will be updated and will be clearer on the role of the NDF and how it can help deliver bold changes. The Outcomes will be strengthened and will be complemented by a monitoring framework.</p> <p>Chapter 4 which covers the national strategic matters will be expanded, with additional policies on rural issues, transport, digital communications and flood risk. The linkages between the national issues and regional issues will be more clearly signposted by using cross-referencing and consistent structures.</p> <p><b>Financial Implication:</b> None.</p>
<p><b>Conclusion 2.</b> The NDF should use a set of clear principles of sustainable development, derived from the Well-being of Future Generations Act 2015, to underpin guidance on the identification of appropriate locations for growth and development.</p>	<p><b>Accept in principle</b></p> <p>The draft NDF set out how the Well-being of Future Generations Act, and its definition of sustainable development, shaped and informed its preparation. Chapter 1 of the NDF will be revised to ensure the key messages are clearly communicated.</p> <p>The Integrated Sustainability Appraisal embeds the principle of sustainable development at all stages of development of the NDF and ensures the NDF is as sustainable as possible.</p> <p><b>Financial Implication:</b> None.</p>
<p><b>Conclusion 3.</b> There is scope for more exploration and better presentation of the implications of the identified challenges and opportunities for each area of Wales. For each area, the NDF should map demographic, economic, environmental and Welsh language dimensions</p>	<p><b>Accept</b></p> <p>It is agreed that spatial representation of key issues will strengthen the NDF and help better explain the challenges and opportunities the NDF is seeking to address. Chapter 2 and the regional sections will be amended to include more maps and graphic presentation of data.</p> <p><b>Financial Implication:</b> None.</p>
<p><b>Conclusion 4.</b> There needs to be a clearer rationale for the allocation of policies between the NDF and PPW. Non-spatial policy</p>	<p><b>Accept</b></p> <p>It is agreed that the relationship between the two documents and, it follows, the allocation of policies, could be more clearly articulated.</p>

Conclusion	Response
<p>should be reserved for PPW. Where a national policy is included in PPW and not the NDF, the NDF should signpost this.</p>	<p>The policies contained in the draft NDF reflected Government priorities outlined in its key strategy documents, particularly where these have a spatial expression, whilst PPW covers all major issues of relevance to the planning system.</p> <p>Chapter 1 of the NDF now provides a clearer rationale for the allocation of policies and this is set within a revised explanation of the relationship between the documents. An illustrative diagram will be included which exemplifies the topic areas covered in both documents. Together these changes seek to highlight where topics are covered by both documents and where they are not.</p> <p>To highlight links between NDF policies and PPW we will include a visual cross-reference alongside each policy, with all links compiled in an appendix to the NDF.</p> <p><b>Financial Implication:</b> None.</p>
<p><b>Conclusion 5.</b> The Welsh Government should publish a matrix or grid that clearly identifies and cross-references the relationship between the NDF and other policies.</p>	<p><b>Accept in Principle</b></p> <p>It is acknowledged that clarity and transparency surrounding the relationships between policy documents is important. The NDF is accompanied by an integrated sustainability assessment which outlines the scope of documents which have a relationship with the NDF.</p> <p>The changes made in response to conclusion 4 are applicable to this conclusion and will provide clarity on the relationships between the NDF and other policies. Further, written statements on how the NDF links to other strategies will be included.</p> <p><b>Financial Implication:</b> None.</p>
<p><b>Conclusion 6.</b> The assessment of challenges and opportunities in the NDF should place Wales within its wider geopolitical context and address its external relationships.</p> <p>The Welsh Government should work with the UK Government to develop mechanisms to encourage cross-border collaboration on spatial planning matters of common interest.</p>	<p><b>Accept</b></p> <p>It is agreed that Chapter 2 of the NDF would be strengthened by a wider UK and geopolitical context.</p> <p>The Welsh Government welcomes opportunities to engage with the UK Government on spatial planning matters, but recognises that England has a significantly different legislative context and approach to spatial planning. The Welsh Government has worked with and involved the offices of the Mayors of the Combined Authorities in South West England, the West Midlands and North West of England in the preparation of the draft NDF. Forums such as the 5 Administrations meetings of Chief Planning Officers and the British and Irish Council have been utilised to develop shared approaches where possible. Where there are mutually beneficial opportunities for cooperation on spatial planning matters,</p>



Conclusion	Response
	<p>for example the current work by the UK Geospatial Commission to develop mapping capabilities, the Welsh Government is eager to be involved.</p> <p><b>Financial Implication:</b> None.</p>
<p><b>Conclusion 7.</b> We are disappointed that there is insufficient alignment and reciprocity between the NDF, the Transport Strategy, the Low Carbon Wales Plan, the Wales National Marine Plan and the Wales Infrastructure Investment Plan. This must be addressed. The Welsh Government must also explain how the NDF will support the foundational economy.</p>	<p><b>Accept</b></p> <p>We agree the NDF will be strengthened when it is complemented by other Welsh Government strategies and plans. To a degree, this should emerge organically as documents such as the Transport Strategy and the Wales Infrastructure Investment Plan are revised in the coming years. An <a href="#">explanatory paper explaining how the NDF will evolve as it is reviewed</a> was published in January 2020.</p> <p>The revised NDF will clarify the relationship and links between the NDF and existing documents, such as Low Carbon Wales and the Wales National Marine Plan.</p> <p>The revised NDF will contain more specific references to the foundational economy, as defined in Prosperity for All: the economic action plan. Where discreet elements of the foundational economy are highlighted in the NDF – for example tourism - we will highlight that this is part of the foundational economy.</p> <p><b>Financial Implication:</b> None.</p>
<p><b>Conclusion 8.</b> The Welsh Government should make a statement on how the policies in the NDF will contribute to its ambition for there to be 1 million Welsh speakers by 2050.</p>	<p><b>Accept</b></p> <p>NDF Outcome 4 will be developed, setting out how planning can contribute to the wider ambition.</p> <p>The ISA contains a specific objective on the Welsh language and contains statements explaining how NDF policies contribute to the Welsh Government’s strategic ambitions for the Welsh language.</p> <p><b>Financial Implication:</b> None.</p>
<p><b>Conclusion 9.</b> The Welsh Government should set out how the NDF is to be monitored.</p>	<p><b>Accept</b></p> <p>It is agreed that the NDF would be strengthened by an explanation of how the NDF will be monitored and reviewed. Chapter 3 will be expanded to provide an overview of the intended approach and a supporting paper explaining in detail the monitoring and review process published.</p> <p><b>Financial Implication:</b> None.</p>
<p><b>Conclusion 10.</b> The NDF should adopt the four region</p>	<p><b>Accept</b></p>

Conclusion	Response
<p>model recommended by Cardiff University.</p>	<p>Cardiff University's August 2017 Report 'Identification of Regional Areas for the National Development Framework' concludes that there should be 4 NDF regions, with Ceredigion being included in the South West region and Powys forming a Central East Wales region in its own right. The report recognises that a single authority region may give rise to issues and states:</p> <p><b>If however there is a determination within Welsh Government that no single authority should constitute a region, it is suggested that consideration could also be given to a region composed of Ceredigion and Powys, given the existence of some northern linkages that exist between the two Unitary Authorities and some of the regionalization analysis.</b></p> <p>It is agreed the NDF should adopt the 4 region model recommended by Cardiff University on the basis that a region should comprise of more than one authority.</p> <p><b>Financial Implication: None.</b></p>
<p><b>Conclusion 11.</b> The NDF should recognise the opportunities for people to live and work sustainably outside towns and cities.</p>	<p><b>Accept</b></p> <p>The Welsh Government agrees that rural areas must provide opportunities for people to live and work so that they remain sustainable, resilient and successful places, complementing not competing against large urban areas.</p> <p>The NDF supports sustainable growth in all parts of Wales. National Growth Areas are complemented by Regional Growth Areas which will grow, develop and offer a variety of public and commercial services at regional scale. Development and growth in towns and villages in rural areas should be proportionate and of appropriate scale, and support local aspirations and need.</p> <p>In order to address these issues the draft NDF policy 4 on rural communities will be split in to two policies, a revised Policy 4 Supporting Rural Communities and a proposed new Policy 5 Supporting the Rural Economy. The purpose of this is to provide clearer focus and greater detail on the issues relevant to each policy and which will together provide a more coherent strategy for rural areas.</p> <p>The revised NDF strongly supports communities in rural areas; the aim is to secure sustainable economic and housing growth which is focussed on retaining and attracting working age population and maintaining and improving access to services.</p>

Conclusion	Response
	<p>The revised NDF recognises the need for a broad economic base to provide employment opportunity, increased skill levels and wages, and identifies sectors which Planning Authorities should seek to encourage, including the foundational sector (especially tourism and food and drink), agricultural diversification and innovative and high technology enterprise.</p> <p>The revised NDF emphasises that settlements reflect good placemaking principles to create vibrant and active places where people can walk and cycle and are less reliant on cars, resulting in greater well-being and health benefits. Public transport initiatives are supported together with active travel and growth of electric charging networks. The NDF supports stronger strategic links across and between regions.</p> <p>The revised NDF states regions should work together to identify ways to develop stronger strategic transport links between rural areas and larger towns and cities for mutual economic benefit.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 12.</b> The NDF should set out a positive strategy for economic and social renewal and development in rural Wales. This strategy should encourage appropriate economic growth, improved transport and ecological connectivity.</p>	<p><b>Accept</b></p> <p>It is agreed the NDF should be revised to present a more positive message for rural areas. Proposed Policy 5 highlights the opportunities for growth and development in rural areas and recognises the challenges that need to be addressed in order to establish economically and socially strong and sustainable places.</p> <p>Draft NDF policy 4 on rural communities will be split in to two policies. A revised Policy 4 Supporting Rural Communities and a new Policy 5 Supporting the Rural Economy. The purpose of this is to provide clearer focus and greater detail on the issues relevant to each policy and which will together provide a more coherent strategy for rural areas.</p> <p>The revised NDF will identify the sectors which are important to rural areas and which should be supported. The rural economy needs to establish a broad employment and skills base to build resilience and sustainability. It is essential that opportunities exist in rural areas to retain and attract people of working age, help tackle social issues and contribute to well-being. The revised NDF supports the foundational sector (emphasising the likes of tourism and food and drink), start-ups, micro business, agriculture and diversification. The revised NDF also recognises the importance of innovative and high technology business in rural areas to help rural areas unlock their full potential. Planning Authorities should encourage the growth of all these</p>

Conclusion	Response
	<p>sectors, and supply and distribution networks, through policies in Strategic and Local Development Plans.</p> <p>The revised NDF emphasises that rural settlements reflect good placemaking principles to create vibrant active places where people can walk and cycle and are less reliant on cars, resulting in greater well-being and health benefits. Public transport initiatives are supported together with active travel and growth of charging networks.</p> <p>The revised NDF talks in detail about transport and connectivity generally across Wales and much of this also applies to rural areas. It has a proposed new Policy 11 National Connectivity and proposed new Policy 12 Regional Connectivity.</p> <p>Ecological connectivity is covered in detail in draft Policy 8 Strategic Framework for Biodiversity Enhancement and Ecosystem Resilience; this has been slightly revised and has been renumbered as proposed Policy 9 Resilient Ecological Networks and Green Infrastructure.</p> <p>The essential nature of digital communications in rural areas is highlighted to support social and economic interaction, access to services and to help tackle isolation and exclusion and improve well-being. The revised NDF supports the need for modern fast digital infrastructure in rural areas. Local Planning Authorities should work with mobile phone and broadband operators to ensure the needs of rural areas are assessed and planned for through the Strategic and Local Development Plan process. Mobile Action Zones will contribute to this objective and a new Digital Communications policy has also been introduced to the NDF.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 13.</b> The Welsh Government should indicate how the strategy in the NDF is to be given effect before SDPs are adopted. Local Planning Authorities have demonstrated a limited appetite for SDPs. The Welsh Government should explain how the development of such plans can be incentivised.</p>	<p><b>Accept</b></p> <p>The NDF will have effect as a development plan from the day it is published and will be used in decision-making. When the NDF is published there may be need to review lower tier plans to ensure they are in general conformity with the NDF.</p> <p>Recognising that Strategic Development Plans (SDPs) are not yet in place, the NDF has a strong focus on regional planning. NDF regional policies set out the key regional issues identified through the plan preparation process to provide a starting point for the preparation of SDPs. This provides a context for regional planning in advance of the adoption of SDPs. As SDPs are required</p>

Conclusion	Response
	<p>by law to be in conformity with the NDF, the regional content of the NDF provides a clear outline of the matters SDPs must address while enabling regionally-distinctive approaches to be developed. Proposed Policy 19 in Chapter 5 of the NDF sets out the framework for the preparation of SDPs.</p> <p>The NDF's regional policies will focus Welsh Government and key stakeholder action and investment in the four regions, identifying key strategic spatial issues and providing a framework for the co-ordination of national economic, housing, regeneration, environmental, flooding, energy, rural and transport policy delivery. SDPs, when prepared, will develop and add detail to the regional policies of the NDF.</p> <p>An important feature of the three-tiered development planning system is the ability of higher tier plans to be influenced by the emergence and adoption of other development plans. In time it is anticipated the NDF, SDPs and LDPs will inform and shape each other and this relationship will ensure a strong, effective planning system at all levels.</p> <p>The NDF has been prepared to directly support the delivery of SDPs. The Local Government and Elections (Wales) Bill 2019 has specifically considered regional planning and places a duty on Local Authorities to work together to prepare SDPs. This will ensure greater certainty on the delivery of SDPs. The Welsh Government will consider using its intervention powers, if required, to commence and drive the preparation of Strategic Development Plans.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 14.</b> The Welsh Government should indicate how it will ensure that national and regional strategic planning and city region deals are co-ordinated and properly aligned. The Welsh Government should set out its understanding of when Regional Economic Development plans will be published.</p>	<p><b>Accept</b></p> <p>The NDF is highlighted in Prosperity for All as holding an important role in driving sustainable growth and combating climate change by guiding strategic development over the next 20 years.</p> <p>The NDF supports the delivery of the Economic Action Plan (EAP) and will help plan and consent the modern connected infrastructure the EAP seeks to deliver; ensure jobs are closer to homes; and develop a stronger approach to regional planning and delivery.</p> <p>City deals and the provision of infrastructure to stimulate growth across wider regional areas, will rely on the planning system to help co-ordinate infrastructure delivery, land-uses and maximise the benefits of investment across regions.</p>

Conclusion	Response
	<p>The Welsh Government's Chief Regional Officers are preparing Regional Economic Frameworks to drive the Welsh Government's regionally focussed approach to economic development. The NDF, with its strong regional focus and direction for Strategic Development Plans, will directly support this approach.</p> <p>Prosperity for All: the Economic Action Plan set a commitment to a more regionally focussed approach to economic development and sets out the intention to develop regional economic plans in each of the regions of Wales.</p> <p>Having engaged with stakeholders the consensus feedback has been the need not for a plan, but rather for Regional Economic Frameworks which set out a shared set of economic priorities across the public, private and third sectors and a shared framework for their delivery within each of the regions. Regional Economic Frameworks (REFs) are important vehicles for facilitating collaborative delivery and it is intended that the REFs will in practice be a high level and long-term economic development strategy for each region, led by Welsh Government, co-designed and co-delivered with the regional partners.</p> <p>The REFs will identify and develop the distinctive strengths of each of the Welsh regions, supporting inclusive and sustainable economic growth, and will maximise opportunities to address regional and local inequalities, helping the Welsh Government and participating partners to contribute to the Well-being Goals for Wales. This is consistent and complementary to the aims of the emerging national (all-Wales) Regional Investment Framework and work is being taken forward in tandem, working closely with colleagues in WEFO.</p> <p>The regional teams, led by the Chief Regional Officers, have been working with key stakeholders and partners over the past months to gather evidence to help inform development of the REF and will be embarking on a series of broader engagement events over the coming months, with a view to publishing later in the year. The ongoing work to align with and inform the City and Growth Deals, OECD project on regional governance and investment, WEFO's thinking on Regional Investment Funds, draft National Development Framework, the Local Government position on CJsCs and a range of other economic development-related work across Welsh Government, will influence the content and potentially the timings of the REFs. Furthermore, the REFs are underpinned by the principle of co-design and</p>

Conclusion	Response
	<p>co-development, and consequently will reflect the pace at which partners in each region are content to proceed, rather than timescales imposed by Welsh Government.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 15.</b> The strategy set out in the NDF should have a clearer economic purpose.</p>	<p><b>Accept in principle</b></p> <p>We agree the NDF would be strengthened by the inclusion of clearer statements on economic ambitions. Links between the NDF and the Economic Action Plan will be clarified, including acknowledging the role of the foundational economy (see also conclusion 7).</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 16.</b> The Welsh Government should provide evidence of the capacity for development in existing urban centres and the availability of publicly owned land for development on the scale and in the locations required to support the NDF strategy.</p>	<p><b>Accept in principle</b></p> <p>The NDF does not set targets for levels of growth, therefore specific capacity studies are not considered appropriate or necessary. The Welsh Government will make available mapping that shows the extent of land-use change in urban locations, including those places named in the draft NDF strategy, over the past twenty years.</p> <p>Land in public ownership includes the holdings of the Welsh Government, UK Government, local authorities, NHS, Ministry of Defence and Natural Resources Wales. A Public Land Unit has recently been established within Welsh Government to focus on delivering development through land in public ownership. The Welsh Government recognises the benefit of developing a single register and map of publicly-owned land but this does not yet exist.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 17.</b> Policies concerning new settlements should be consistent between the NDF and PPW.</p>	<p><b>Accept in principle</b></p> <p>PPW sets the overall context for new settlements and the process for a development plan to allocate one. PPW enables new settlements to be identified under certain circumstances, but does not require development plans to identify them.</p> <p>We do not agree with the inference that PPW and the NDF are not consistent with each other. This NDF states that new settlements are not necessary at this time and that our focus should be on radical improvements to existing cities and towns to address deprivation, inequality and to improve the range and quality of services they offer. This position does not prejudice future iterations of the NDF from identifying a need for</p>

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	<p>new settlements if the evidence suggests that they are required.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 18.</b> The NDF should make a clearer statement about the important role of universities in supporting strategic development and renewal at national and regional levels.</p>	<p><b>Accept</b></p> <p>It is agreed that Chapter 2 of the NDF should identify the opportunity universities provide to support strategic development. Each regional section will also be amended to identify the importance of universities within each region.</p> <p><b>Financial Implication: None.</b></p>
<p><b>Conclusion 19.</b> We believe the NDF is a key tool in addressing climate change. The NDF should look beyond decarbonisation and address other aspects of climate change such as flood risk, water management and the implications for coastal planning.</p>	<p><b>Accept</b></p> <p>A new policy on flood risk management is proposed (policy 8), recognising the severity of flood risk in some parts of the National and Regional Growth Areas and the need for sustainable management of flood risk.</p> <p>The NDF Outcomes have been amended to strengthen and develop references to climate change, based on the feedback received through the consultation.</p> <p>The revisions to Chapter 2 will include providing more context on climate change and associated issues, including flood risk, water management and coastal planning.</p> <p>The NDF also contains policies on the role played by nature-based solutions, including the safeguarding of ecosystem services and the provision of green infrastructure, and makes a connection between these and wider land management issues, all of which are vital as part of responding to the climate emergency.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 20.</b> The climate change outcome should encompass housing and the outcome for homes and housing should address the types of homes Wales needs to build to address climate change.</p>	<p><b>Accept</b></p> <p>The NDF Outcomes have been amended to strengthen and develop references to climate change, based on the feedback received through the consultation and the conclusion of the Committee.</p> <p>Outcome 11 has been amended to specifically state new homes will need to be energy efficient and help communities adapt to the changing climate.</p> <p><b>Financial Implication: None</b></p>



Conclusion	Response
<p><b>Conclusion 21.</b> The NDF should articulate the spatial dimension of its strategy for decarbonising transport and heating. It should set out more clearly how reduced reliance on private vehicles is to be achieved in both urban and rural areas.</p>	<p><b>Accept in principle</b></p> <p>Planning Policy Wales (PPW) articulates the Welsh Government’s commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. It acknowledges that delivering this modal shift will make an important contribution to decarbonisation and improving air quality.</p> <p>PPW sets out policy requiring the use of a sustainable transport hierarchy in relation to new development which prioritises walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services.</p> <p>To support the policy position in PPW, Chapter 4 of the NDF will be expanded with additional policies on National and Regional Connectivity. The new policies and supporting text set out how the Welsh Government aims to improve connectivity within and between urban and rural areas by reducing the need to travel, particularly by private vehicles, and supporting a modal shift to walking, cycling and public transport. The policies also support the implementation of the Active Travel Act and the revitalisation of the National Cycle Network.</p> <p>In relation to the decarbonising of heat, proposed Policy 16 sets out that our spatial priority is for the suitability and viability of District Heat Networks to be investigated in the towns and cities identified in the NDF as Priority Areas for District Heat Networks. Although heat networks are supported in principle wherever they are viable, these are the areas in Wales considered to have the greatest potential for heat networks.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 22.</b> The NDF should indicate how the delivery of vehicle charging infrastructure and heat networks is to be taken forward.</p>	<p><b>Accept</b></p> <p>It is agreed the NDF should provide further clarity on how the planning system can assist in the delivery of electric vehicle charging infrastructure across Wales.</p> <p>Chapter 4, which covers the national strategic matters, will be expanded with additional policies on transport. The new National and Regional Connectivity policies (proposed policies 11 and 12) will set out how the Welsh Government will support the delivery of electric vehicle charging infrastructure in both rural and urban areas. The Welsh Government will also be publishing an Electric Vehicle Charging Strategy. Permitted development rights</p>

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	<p>were introduced in 2019 for the installation, alteration and replacement of electrical outlets and upstands for recharging electric vehicles, subject to conditions, to expedite the creation of a Wales-wide network of electric vehicle charging infrastructure - at homes, workplaces and key destinations, such as supermarkets, retail and commercial centres and leisure facilities.</p> <p>In relation to heat networks, the NDF states that planning authorities should explore and identify opportunities for District Heat Networks, particularly in the Priority Areas, and, where possible, seek to develop city or town-wide District Heat Networks in as many locations as possible. It states that, as a minimum, proposals for large-scale, mixed-use developments of 100 dwellings or 10,000sq m of commercial floorspace or more should consider the potential for a heat network</p> <p>Support for heat network planning is already available from the UK Government. Part of the Welsh Government's Renewable Energy Toolkit for planners also contains information on how local planning authorities can begin to map the potential in their areas. The Welsh Government will also be considering what further assistance and guidance it can give in the future.</p> <p><b>Financial Implication:</b></p> <p>The Welsh Government is investing £2m in the short-term to facilitate a network of rapid electric vehicle chargers. However, we expect business and industry to drive much of the roll-out of charging infrastructure.</p>
<p><b>Conclusion 23.</b> The NDF should look at the housing sector as a whole and address the role of the private sector, including SME builders in housing delivery. This should include small sites not included in Local Development Plans.</p>	<p><b>Accept in principle</b></p> <p>The Welsh Government recognises that private sector house-builders play an important role in addressing housing needs, including contributing to the delivery of affordable housing.</p> <p>The Welsh Government will continue to work with house-builders on the delivery of private sector housing. However, in order to address the significant need for affordable homes identified in the Welsh Government's 'Estimates of housing need', the focus of the NDF is on the role of local authorities and registered social landlords in increasing the number of affordable homes provided in Wales. Proposed amendments to the text supporting the policy on 'Delivering Affordable Homes' will recognise the contribution of new market homes in addressing housing need more broadly.</p>

Conclusion	Response
	<p>Planning Policy Wales already requires planning authorities to set a target for the delivery of homes on small sites and to maintain a register of small sites which fall below the threshold for allocation in their development plans. In addition, the Welsh Government's £40m Stalled Sites Fund is assisting in creating and promoting development opportunities for SME construction companies. Also, since 2013 the Welsh Government has been supporting SME builders with access to affordable development financing through the Wales Property Development Fund. (See Conclusion 4)</p> <p><b>Financial Implication:</b> None</p>
<p><b>Conclusion 24.</b> The NDF needs to specify the mechanisms to be used to deliver new affordable housing on the scale envisaged by the strategy. The Welsh Government should explain how the "Independent review of affordable housing supply" it commissioned, and which reported in May 2019, will inform the NDF.</p>	<p><b>Reject</b></p> <p>The NDF is clear that there will need to an increased focus on the role of local authorities, registered social landlords and SME builders in order to deliver the increase in affordable homes indicated. The conclusions of the 'Independent Review of Affordable Housing' support this position and were taken into account in the preparation of the draft NDF.</p> <p><b>Financial Implication:</b> This could require a change to Welsh Government funding for affordable housing.</p>
<p><b>Conclusion 25.</b> The NDF's estimate of housing need should be updated based on the latest available evidence.</p>	<p><b>Accept</b></p> <p>Updated estimates of housing need will be included in the final version of the NDF.</p> <p><b>Financial Implication:</b> None</p>
<p><b>Conclusion 26.</b> Any targets for affordable housing should be expressed as numbers, not percentages.</p>	<p><b>Reject</b></p> <p>The NDF does not include targets for affordable housing. The percentages of affordable housing included in the NDF are taken from the Welsh Government's 'Estimates of housing need by tenure' and are indicative and trend based only, forming part of the context to inform planning authorities when determining their housing requirements through their Strategic or Local Development Plans.</p> <p><b>Financial Implication:</b> N/A</p>
<p><b>Conclusion 27.</b> The housing needs of older people need to be given particular attention. National guidance on this should be provided by the NDF itself.</p>	<p><b>Accept in principle</b></p> <p>The changing population of Wales, including the trend towards there being a higher number of older people, is recognised as being part of the context for the NDF, as set out in Chapter 2. The housing needs of older people vary across Wales and this is therefore more</p>

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	<p>appropriately addressed by each local authority, based on the specific needs they have identified for their area.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 28.</b> The NDF should recognise the importance of SME builders in providing housing in rural Wales and explore the potential for removing barriers to the construction of small housing developments of under 10 units.</p>	<p><b>Accept in principle</b></p> <p>The NDF recognises that SME builders have an important role in increasing the provision of new homes across Wales. As part of facilitating this Planning Policy Wales already requires planning authorities to set a target for the delivery of homes on small sites and to maintain a register of small sites which fall below the threshold for allocation in their development plans. In terms of removing barriers, the Welsh Government's £40m Stalled Sites Fund is assisting in creating and promoting development opportunities for SME construction companies. Also, since 2013 the Welsh Government has been supporting SME builders with access to affordable development financing through the Wales Property Development Fund. (See Conclusion 4)</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 29.</b> The Committee is disappointed by the ongoing lack of progress in amending Part L (Conservation of fuel and power) of building regulations. The Welsh Government should set out its timetable for amending Part L</p>	<p><b>Accept</b></p> <p>Part L (and F) consultation proposals for new housing were published on 19 December 2019 and ended on 12 March 2020. The proposals include a significant and necessary step-change in energy and carbon performance in new housing. The consultation also provided details of possible 2025 standards. Later this year we will also be consulting on proposals to prevent overheating in new dwellings, Part L standards for non-domestic buildings and where building work is carried out to existing dwellings. The consultation also indicated that the preferred timeline for the Part L regulations to come into force is in 2020.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 30.</b> The NDF should identify core infrastructure requirements and should provide a spatial framework to inform decision-making for all nationally significant infrastructure.</p> <p>The Welsh Government should set out its "in principle" position on non-</p>	<p><b>Accept in principle</b></p> <p>The long term infrastructure needs of the country will be assessed by the National Infrastructure Commission for Wales (NICW). The NDF is a vehicle for coordinating investment in infrastructure with a wider strategy for development, to ensure the benefits of infrastructure investment are maximised. The NDF will be published before NICW provides its recommendations, therefore the strong support for Metro systems, enhanced active travel and green infrastructure, and flood risk management infrastructure in the NDF should be acknowledged by NICW. As outlined in response to</p>

Conclusion	Response
<p>devolved infrastructure projects and policies.</p>	<p>Conclusion 7, there will be much stronger alignment and reciprocity between key documents as the full suite of relevant strategies and plans are put in place.</p> <p>The Welsh Government regularly makes the case for investment by the UK Government and utility providers in non-devolved infrastructure that will benefit the well-being of people in Wales, and it will continue to do so. Where non-devolved infrastructure projects are proposed by other parties, the Welsh Government gives clear statements of its views and ensures it is actively involved in discussions and plans.</p> <p><b>Financial Implication: none</b></p>
<p><b>Conclusion 31.</b> The NDF should include specific proposals to address connectivity issues within Wales in addition to those which cross the border with England. This should include improved connectivity between Welsh towns and cities, between urban and rural areas and also within rural areas. The NDF should also reflect the Welsh Government's Active Travel priorities.</p>	<p><b>Accept</b></p> <p>It is agreed the NDF should be more explicit and address the issue of connectivity within Wales in addition to those which cross the border with England.</p> <p>Chapter 4, which covers the national strategic matters, will be expanded with additional policies on National and Regional Connectivity (proposed policies 11 and 12). The new policies and supporting text set out how the Welsh Government aims to improve connectivity within and between urban and rural areas by reducing the need to travel, particularly by private vehicles, and supporting a modal shift to walking, cycling and public transport. The policies also support the implementation of the Active Travel Act and the revitalisation of the National Cycle Network.</p> <p>The National and Regional Connectivity policies are supported by specific transport policies in the regional sections of the NDF which provide the regional context and specific proposals for improving connectivity.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 32.</b> The Committee understands that there is greater demand for east-west transport connectivity in the major corridors in both north and south Wales, but the NDF should also address the poor connectivity between north and south Wales</p>	<p><b>Accept</b></p> <p>It is agreed that the NDF should also address the issue of connectivity across Wales and between the Regions.</p> <p>Chapter 4, which covers the national strategic matters, will be expanded with additional policies on National and Regional Connectivity. The new policies and supporting text set out how the Welsh Government aims to improve connectivity across Wales and between the Regions by reducing the need to travel, particularly by private vehicles, and supporting a modal shift to walking, cycling and public transport.</p>

Conclusion	Response
	<p>The National and Regional Connectivity policies are supported by specific transport policies in the regional sections of the NDF which provide the regional context and specific proposals for improving connectivity.</p> <p><b>Financial Implication:</b>None</p>
<p><b>Conclusion 33.</b> The Welsh Government's commitments on digital infrastructure, including Mobile Action Zones, need to be given spatial expression in the NDF.</p> <p>Spatial policies for ports and freight transport require development.</p>	<p><b>Reject - Mobile Action Zones</b> <b>Accept - Ports and freight transport</b></p> <p>Whilst it had been the Welsh Government's early intention to include maps in the NDF showing Mobile Action Zones, this has not been achievable in the Plan's current time-frame. The Digital Infrastructure Department continue to work on identifying the specific locations of each Zone. Once approved by the Welsh Government, the Zones will be subject to normal consultation procedures.</p> <p>NDF policy clearly establishes the principle of Mobile Action Zones and how the Welsh Government will work with Local Planning Authorities and mobile operators to create the right environment to bring forward improved coverage within these areas (when identified). The development plan status of the NDF affords greater weight to the policy's intentions, despite there being no direct spatial reference to Zones.</p> <p>The UK Government has been working with mobile operators on an initiative to establish a Shared Rural Network across the UK, including Wales. This would allow mobile operators to share infrastructure to provide 4G services, enabling most rural areas to get the fast and reliable mobile coverage they need. The initiative is subject to agreement and would take place over a five-year period up to 2025.</p> <p>Planning Policy Wales sets out the national policy position regarding ports and acknowledges the important role they play in the economy and the sustainable movement of freight. PPW recognises that functional and attractive ports which meet current and future demand, make Wales an attractive location for businesses, visitors and freight transportation.</p> <p>This policy position will be supported by the introduction of a new International Connectivity Policy in Chapter 4 of the NDF which identifies Cardiff Airport, Haven Waterway, Fishguard Port and Holyhead Port as Strategic Gateways (proposed policy 10). The Strategic Gateways are critical to the effective movement of people and cargo as part of networks or supply chains within their respective regions, Wales and the UK.</p>

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	<p><b>Financial Implications:</b></p> <p>There are no financial implications to the Mobile Action Zone policy in the NDF. The establishment of the mobile infrastructure within Zones may require Welsh Government financial support.</p> <p>There are no financial implications regarding spatial policies for ports and freight transport.</p>
<p><b>Conclusion 34.</b> The NDF should set out a unifying strategic vision for the future of energy in Wales and be clear about the targets for electricity generation and decarbonisation to which the Welsh Government is working.</p>	<p><b>Accept in principle</b></p> <p>The NDF takes into account wider Welsh Government policies and strategies and provides the planning policies necessary to achieve them. It is not the role of the NDF to set the Welsh Government’s overarching energy strategy and policy.</p> <p>The NDF is clear that its renewable energy policies are seeking to help achieve the Welsh Government’s existing renewable energy and decarbonisation targets which have been set by the Minister for Energy, Environment and Rural Affairs.</p> <p>It is accepted though that the above position should be more clearly set out in the NDF and changes to the supporting text of the renewable energy policies will be made.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 35.</b> The NDF should provide a supportive framework for renewable technologies other than wind and solar, and address storage and the onshore infrastructure requirements of offshore wind farms.</p>	<p><b>Accept</b></p> <p>The draft NDF contained a policy which was supportive of other renewable energy technologies and which sought to consider the same issues as those for wind and solar. However it is accepted that this situation was unclear.</p> <p>The revised renewable energy policies of the NDF now clearly apply to all renewable and low carbon technologies and reference to associated infrastructure requirements are now included.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 36.</b> The level of support for renewable energy developments provided by the NDF should not be weaker than that previously provided by UK National Policy Statements.</p>	<p><b>Accept in principle</b></p> <p>We do not consider that the draft NDF provided any less of a supportive environment for renewable energy development than was previously the case. This, coupled with the very positive policy statements in PPW, should give renewable energy developers the planning support</p>

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Renewable energy policies should address repowering and extending the life of existing developments.	<p>they need to proceed with schemes. In Wales there is a significantly more supportive regime for large-scale onshore wind development than the UK Government currently provides for developments in England.</p> <p>However, we accept that the policies could be clearer in this respect. The revised policies therefore are more explicit in both expressing the Welsh Government's support for renewable energy generally and that schemes will be permitted provided the criteria contained within the policies are met.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 37.</b> The NDF should set out the implications of decarbonising heat and transport for electricity demand and the transmission system.</p>	<p><b>Accept in principle</b></p> <p>It is difficult for the NDF to set out the implications of decarbonising heat and transport at this stage as the routes to decarbonisation are not fixed and there are many variables. It is not the role of the NDF to set the Welsh Government's overarching energy strategy and policy, which can be found elsewhere.</p> <p>However, during the lifetime of the NDF, the energy system will likely move to a "multi-vector system" approach, which will require flexibility to fully exploit the inter-relationships and synergies between the power, heat and transport sectors. Future reviews of the NDF will need to respond to this when the picture becomes clearer. Text to this affect has been added to the revised NDF.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 38.</b> The NDF should express a vision and strategy to support developments based on local energy distribution</p>	<p><b>Accept in principle</b></p> <p>The Welsh Government supports the move towards local energy distribution as a way of minimising the need for new, large-scale grid infrastructure. Revisions to the supporting text of the NDF will be made to refer to this 'multi-vector' approach.</p> <p>The NDF takes into account wider Welsh Government policies and strategies and provides the planning policies necessary to achieve them. It is not the role of the NDF to set the Welsh Government's overarching energy strategy and policy, which can be found elsewhere.</p> <p>The Minister for Energy, Environment and Rural Affairs is currently preparing a policy statement on local energy and its implications for distribution.</p> <p><b>Financial Implication: None</b></p>



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<p><b>Conclusion 39.</b> Policy 7 should be amended to address grid infrastructure requirements.</p>	<p><b>Accept in principle</b></p> <p>Draft Policy 7: Ultra Low Emission Vehicles, will be incorporated into the new National and Regional Connectivity policies (proposed policies 11 and 12) in Chapter 4 of the NDF.</p> <p>The Welsh Government is working with energy network operators in Wales to develop the electricity grid infrastructure to support increased use of electric cars, which is reflected in the supporting text.</p> <p><b>Financial Implication:</b> We expect business and industry to drive much of the roll-out of charging infrastructure, including grid capacity and infrastructure.</p>
<p><b>Conclusion 40.</b> The NDF should adopt a criteria-based policy framework for renewable energy developments.</p>	<p><b>Accept</b></p> <p>Whilst the draft NDF renewable energy policies listed the issues which needed to be considered, it is recognised that they did not provide the level of certainty to stakeholders and decision-makers on the criteria that should be followed.</p> <p>The revised NDF contains a positively framed detailed criteria-based policy for the determination of all renewable and low carbon energy developments over 10MW.</p> <p><b>Financial Implication:</b> None</p>
<p><b>Conclusion 41.</b> Wind and solar developments are subject to very different constraints and have different potential impacts on wildlife, and should, therefore, be addressed by separate planning policies.</p>	<p><b>Accept in principle</b></p> <p>Whilst it is accepted that wind and solar developments have different impacts on wildlife, the Welsh Government considers that, at a strategic level, NDF policies can be framed that can deal with these issues collectively. It is preferable (like many other planning policy documents) for single policies to cover all technologies available and for the decision-maker to consider the issues in detail.</p> <p>The Welsh Government has produced practice guidance on this which will be useful in this regard:  <a href="https://gov.wales/planning-implications-renewable-and-low-carbon-energy-development-practice-guidance">https://gov.wales/planning-implications-renewable-and-low-carbon-energy-development-practice-guidance</a></p> <p>The revised NDF policies and supporting text give clearer statements on the protection of protected sites and wildlife species.</p> <p><b>Financial Implication:</b> None</p>
<p><b>Conclusion 42.</b> The NDF policy on wind and solar</p>	<p><b>Accept</b></p>

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energy developments should accord the same level of protection to SSSIs as PPW.	<p>It is important that the NDF and PPW are consistent in demonstrating the same level of protection to Sites of Special Scientific Interest (SSSIs).</p> <p>Changes have been made to the criteria-based policy and supporting text to ensure this level of consistency between the two documents.</p> <p><b>Financial Implication:</b> None</p>
<b>Conclusion 43.</b> The NDF should recognise the potential to secure environmental and recreational benefits in association with renewable energy developments	<p><b>Accept in principle</b></p> <p>The draft NDF recognised the potential to secure benefits associated with renewable energy schemes and stated that planning applications must demonstrate how local social, economic and environmental benefits have been maximised as part of development proposal.</p> <p>However, it is recognised that these statements could be stronger, particularly around environmental benefits. The revised renewable energy policies therefore state that proposals should describe the net economic benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. The criteria-based policy also requires that proposals includes biodiversity enhancement measures to provide a net benefit for the environment.</p> <p><b>Financial Implication:</b> None</p>
<b>Conclusion 44.</b> Biodiversity enhancement, ecosystem resilience, strategic green infrastructure and the national forest should be given spatial expression in the NDF. The NDF should set out how the commitments are to be delivered.	<p><b>Accept in principle</b></p> <p>We agree that the NDF could be strengthened to spatially represent the strategic environmental policies. An illustrative map (not presented on an ordnance survey base) will be included in the NDF to indicate broad locational information for themes such as biodiversity hotspots, biodiversity networks and ecosystem services. The supporting text will be expanded to include more directional narrative on policy implementation.</p> <p><b>Financial Implication:</b> None</p>
<b>Conclusion 45.</b> Policy 8 should be strengthened to state that biodiversity “must” rather than “should” be protected and should require that development contributes to nature recovery.	<p><b>Accept</b></p> <p>We agree that the policy wording should be changed to a ‘must’; Section 6 of the Environment (Wales) Act 2016 directs public authorities to maintain and enhance biodiversity in the exercise of their functions. The policy will be amended to reflect the legislation.</p> <p><b>Financial Implication:</b> None</p>
<b>Conclusion 46.</b> The NDF should identify national	<p><b>Accept in principle</b></p>

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<p>spatial priorities for biodiversity enhancement. There is a need to embed the requirement for the mitigation measures identified by the Habitats Regulations Assessment into the NDF. The national ecological network should address the needs of priority species.</p>	<p>We agree that the NDF can be strengthened to include a tighter policy focus to securing biodiversity enhancement. The NDF's strategic focus can be utilised to deliver a net benefit for biodiversity in order to realise sustainable growth.</p> <p>The Habitats Regulations Assessment (HRA) of the NDF is an iterative assessment process; work is being undertaken to develop a mitigation table that clearly articulates the mitigation measures that will be needed to deliver the NDF policies. References within the NDF to the HRA will be enhanced and this will clearly signpost the mitigation measures.</p> <p>The policy and supporting narrative have been strengthened to accommodate the needs of species within resilient ecological networks. The needs of all species will be referenced in order to reflect the complexity of natural systems.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 47.</b> The development of the national forest should take account of the potential role of tree planting in water and flood risk management as well as agri-food production. Planting to develop the national forest should avoid peatland.</p>	<p><b>Accept in principle</b></p> <p>The National Forest policy in the NDF is an enabling policy. One of the strategic aims is to develop a national forest resource that delivers connected ecosystems, improved biodiversity and habitats. The specific needs of planting regimes will be identified elsewhere, however the NDF will guide the sustainability of such locations through the policy on resilient ecological networks.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 48.</b> The NDF should identify existing woodland assets. The national forest should further the conservation of globally significant Celtic rainforest.</p>	<p><b>Accept in principle</b></p> <p>We agree that the spatial representation of existing broad habitat types should be strengthened in the NDF. An illustrative map, identifying key existing forestry assets will be included.</p> <p>The Celtic Rainforest is supported by Welsh Government and implementation of the National Forest Policy will align with and further support the conservation of this unique and hugely significant habitat.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 49.</b> The opportunity should be taken to make links between green infrastructure networks and the housing and urban renewal agendas. Links should also</p>	<p><b>Accept in principle</b></p> <p>The Welsh Government agrees that the role of green infrastructure in creating sustainable urban communities should be more clearly recognised in the NDF. The proposed policy on shaping urban growth will reference</p>

Conclusion	Response
<p>be made between green infrastructure networks, the national forest and the tourism and leisure agenda through initiatives such as the National Cycle Network.</p>	<p>the functional role of green infrastructure as a key principle of placemaking.</p> <p>PPW 10 expresses wider connections between policy areas such as green infrastructure networks, tourism and active travel routes. The placemaking narrative positively articulates such connections.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 50.</b> There is a need for greater clarity on the role of green belts in national and regional strategy; the discretion accorded to SDPs in their definition; the relationship between and respective roles of green belt and green infrastructure; and the potential relationship of greenbelt with the national forest policy</p>	<p><b>Accept</b></p> <p>It is accepted that the NDF policies (and their supporting text) on green belts in North and South East Wales would benefit from greater clarity on their establishment through the SDP process and how planning proposals should be determined in these areas in advance of the adoption of SDPs. Changes will be made to the NDF to this effect.</p> <p>Whilst green belt and green infrastructure may geographically cover the same areas and be mutually reinforcing in terms of affording protection to land from development, the purposes of identifying green infrastructure and green belt differ.</p> <p>The same rationale will be true of land identified as having potential for woodland planting as part of the National Forest. In addition, the question of how to address any other type of development in a green belt, including those which may be associated with a national forest proposal, is already covered by policy in PPW.</p> <p><b>Financial Implication: None</b></p>
<p><b>Conclusion 51.</b> The Business Committee, as the Assembly Committee with responsibility for considering Assembly procedures, should bring forward proposals to facilitate scrutiny of the final NDF in accordance with the Planning (Wales) Act 2015. It should do so in consultation with the Welsh Government, external stakeholders and Assembly Committees.</p>	<p><b>Not for the Welsh Government to accept or reject</b></p> <p>The Welsh Government continues to work with the Business Committee to ensure Committee scrutiny of the draft NDF is facilitated, in accordance with the Planning (Wales) Act 2015.</p> <p><b>Financial Implication: None</b></p>

## 6. Economy, Skills and Infrastructure Committee letter

Welsh Government response to [Economy, Infrastructure and Skills Committee letter](#) dated 5 February 2020

Issue Raised	Response
<p>1. The framework seems to lack ambition. When drafting a key national planning document like this, there is an opportunity to set the agenda and make changes which will address big issues in society such as tackling climate change and economic and social inequality. The Committee felt that this opportunity has been missed somewhat.</p>	<p>We do not accept the Committee’s assessment that the draft National Development Framework (NDF) lacks ambition. The NDF includes a vision and the policies to enable and deliver radical improvements to how places look and function across the country. The vision and policies reflect the wider strategic framework in which the NDF sits, which includes the Economic Action Plan, Low Carbon Wales and the Wales infrastructure Investment Plan.</p> <p>The NDF is seeking to address significant and long term challenges, including the climate and environmental emergencies. It is explicitly seeking to enable a modal shift in travel methods and to reduce distances between people’s homes, their jobs and the services they use. It is committed to placemaking – the method of planning that places value on having excellent access to services, community facilities and open spaces in communities. The net result would be a more decarbonised society that is less reliant on cars and healthier, more sociable communities with vibrant local services. In this regard, the NDF is perfectly aligned with the Welsh Government’s commitment to revitalising town centres, to develop Metro transport systems and to enhance our natural resources.</p> <p>A ‘lack of ambition’ is a term used in some consultation responses that want the NDF to allow widespread exploitation of greenfield land for the development of new poorly-located commuter towns and ‘anywhere’ estates. Focusing on opportunities to regenerate and renew town centres by promoting mixed developments and better sustainable transport infrastructure in existing towns and cities is ambitious because it is not the easiest option to take. It is the approach that is most likely to prioritise using brownfield land and the approach that is most likely to lead to more sustainable lifestyles.</p>

Issue Raised	Response
	<p>As an estimate, new homes developed over the next twenty years will account for 8% of the housing stock. The NDF does not focus solely on planning for this 8% of homes – it also provides a vision for how all places will be healthier and more vibrant in future.</p> <p>The NDF vision will influence other Welsh Government documents. The mechanisms for reviewing the NDF every 5 years (or sooner) will ensure it can influence and be responsive to the emergence of related strategies and plans, including: the Wales Infrastructure Investment Plan, the Wales Transport Strategy and recommendations of the National Infrastructure Commission for Wales. A vision for how the NDF will develop with each review is set out in a <a href="#">paper on the NDF Monitoring Framework</a>.</p> <p><b>Financial Implication:</b> None.</p>
<p>2. The Committee is concerned that this lack of ambition means the NDF’s will not create the correct space to foster growth in the economy. Professor Goodstadt stated “what’s missing is some sense of the overall scale of the Welsh economy and what that should be” and referred to the document as only setting out a “trend-based view of life.”</p>	<p>The NDF takes into account wider Welsh Government policies and strategies and provides the planning policies and context necessary to achieve them. It is not the role of the NDF to set the Welsh Government’s overarching economic policy as these can be found elsewhere in the Programme for Government and Economic Action Plan.</p> <p>The NDF provides the context for the planning ambitions set out in Welsh Government policies to be translated through Strategic and Local Development Plans which will put more detail on anticipated levels of sustainable economic growth, leading to greater fairness and equality between areas.</p> <p><b>Financial Implication:</b> None.</p>
<p>3. For example, the NDF does not mention the foundational economy despite this being a clear priority of the Welsh Government, indeed the UK2070 Commission has noted that Wales is</p>	<p>The Welsh Government’s approach to the foundational economy is currently being developed by the Minister for Economy, Transport and North Wales as one of the key features of the Economic Action Plan. It is difficult to frame national, strategic land use planning policies around this sector given its nature as</p>

Issue Raised	Response
<p>leading the way this field. The foundational economy approach should be noted in, celebrated by and built on in the NDF.</p>	<p>something which is very locally based and driven by need within a tightly defined area.</p> <p>Amendments to the NDF include reference to the importance of the foundational economy throughout Wales. The Welsh Government will also consider what other planning guidance could be issued to planning authorities and others to help develop this sector.</p> <p><b>Financial Implication:</b> None.</p>
<p>4. The lack of ambition in the document is also evident in that it does not set out specific pieces of key large transport infrastructure. For example, the Committee would have expected more details the planned Metros included in the NDF.</p>	<p>The NDF must be considered alongside other Welsh Government strategies and programmes. The Welsh Government will publish a new Wales Transport Strategy in 2020 which will set out the vision, priorities and desired outcomes for transport. The Strategy will be aligned with the NDF and support its spatial strategy which directs where new development and infrastructure investment will be focused. A new National Transport Delivery Plan will be produced to support the delivery of the Wales Transport Strategy and the NDF. The long term infrastructure needs of the country will also be identified by the National Infrastructure Commission for Wales (NICW).</p> <p>The NDF is a vehicle for setting direction and co-ordinating investment in infrastructure with a wider strategy for development, to ensure the benefits of infrastructure investment is maximised.</p> <p>The NDF will be published before NICW provides its recommendations. There will be stronger alignment and reciprocity between key documents as the full suite of relevant strategies and plans are put in place.</p> <p><b>Financial Implication:</b> None</p>
<p>5. The Committee was concerned about the sequencing of the national, strategic and local plans. Most Local Development Plans (LDPs) have been</p>	<p>The Welsh Government is committed to a three-tiered development planning system. The Planning (Wales) Act 2015 introduced the ability for local planning authorities to collaborate to produce SDPs. Although the relevant powers were commenced in 2015, proposals for SDPs have been slow to come forward. The Local</p>

Issue Raised	Response
<p>developed and clearly the work to develop the NDF is well underway. However very little work has been undertaken at the regional level on Strategic Development Plans (SDPs). The Committee understands that we will be well into the 2020s before the first SDP is up and running. At this point we will be into the second, if not the third iteration of the NDF. Having some LDPs developed ahead of the NDF, and well ahead of the SDPs seems to present a risk of a disjointed approach to strategic planning. The timeframe before we see the three levels of plans working in order and harmony also is of concern. The Committee would like some reassurances around the speed of the SDPs and remaining LDPs coming forward and how the Government will ensure this lag between the three levels does not harm the NDF's ability to provide the correct spatial plan to address the key national priorities it sets out to do.</p>	<p>Government and Elections (Wales) Bill will mandate preparation of SDPs, with governance provided by Corporate Joint Committees. The NDF further mandates the preparation of SDPs by providing a focus on regional planning, with Chapter 5 setting a framework for the preparation of SDPs (Policy 19). The NDF's regional policies will focus Welsh Government and key stakeholder action and investment in the four regions, identify key strategic spatial issues, and provide a framework for the co-ordination of national economic, housing, regeneration, environmental, flooding, energy, rural and transport policy delivery.</p> <p>Recognising that SDPs are not yet in place, the NDF policies also set out key regional issues identified across the NDF process to provide a starting point for the preparation of SDPs and a regional context for the planning system in advance of the adoption of SDPs. As SDPs are required by law to be in conformity with the NDF, the regional content of the NDF provides a clear outline of the matters SDPs must address while enabling regionally-distinctive approaches to be developed</p> <p>An important feature of the three-tiered development planning system will be the ability of higher tier plans to be influenced by the emergence and adoption of other development plans. It is anticipated that Strategic Development Plan evidence bases will form part of the evidence base for future NDFs. In time the NDF, SDPs and LDPs will inform and shape each other and this relationship will ensure a strong, effective planning system at all levels.</p> <p><b>Financial Implication:</b> None.</p>
<p>6. The Committee felt that the document was light on improving transport links between Welsh regions and cross-border with England. Both north-south and east-west connectivity could be greatly improved. This could be via direct</p>	<p>The NDF will be strengthened in response to consultation responses relating to transport issues. Chapter 4, which covers the national strategic matters, has been expanded with three additional policies on International, National and Regional Connectivity.</p> <p><b>Proposed Policy 10 – International Connectivity</b></p>



Issue Raised	Response
<p>links within an all-Wales integrated transport network, emphasising opportunities to develop public transport links and active travel. As well as helping people navigate easily around Wales this network could also transport people into local hubs where they can travel onwards to England, Ireland and further afield.</p>	<p>This policy sets out how the Welsh Government will support international connectivity at Cardiff Airport, Holyhead Port, the Haven Waterway and the Fishguard Port. This policy integrates what were three regional policies in the draft NDF.</p> <p><b>Proposed Policy 11 – National Connectivity</b> This policy sets out how the Welsh Government will support and invest in improving national connectivity. It identifies that our priorities are to encourage longer-distance trips to be made by public transport, whilst making longer journeys possible by electric vehicles, and also supports strengthening of the National Cycle Network.</p> <p><b>Proposed Policy 12 – Regional Connectivity</b> This policy sets out how the Welsh Government will support and invest in improving regional connectivity. It sets out our priorities for both urban and rural areas.</p> <p>The National and Regional Connectivity policies are supported by specific transport policies in the regional sections of the NDF which provide the regional context and specific proposals for improving connectivity.</p> <p><b>Financial Implication:</b> None.</p>
<p>7. Although sea travel is not devolved, ports are. Whilst the Committee understands it's unlikely any new ports will be developed, infrastructure links to ports should feature in the document.</p>	<p>This policy position will be supported by the introduction of a new International Connectivity Policy in Chapter 4 of the NDF which identifies Holyhead Port, Haven Waterway and Fishguard Port as Strategic Gateways.</p> <p>Planning Policy Wales (PPW) sets out the national policy position regarding ports and acknowledges the important role they play in the economy and the sustainable movement of freight. PPW recognises that functional and attractive ports which meet current and future demand, make Wales an attractive location for businesses, visitors and freight transportation.</p>

Issue Raised	Response
	<p>As set out in PPW, the Welsh National Marine Plan (WNMP) provides a vision within which ports can plan their current and future operations, including options for expansion and diversification. Planning authorities must consider the land use implications of the WNMP when preparing their development plans.</p> <p><b>Financial Implication:</b> None.</p>
<p>8. The Committee was not convinced by the argument for Wales to be split into three regions. Whilst it understands SDPs need not cover the whole of a region, it feels the Mid and South West Wales region would be better split with Mid Wales and South West Wales being regions to reflect their distinct characteristics.</p>	<p>It is agreed that the NDF would be enhanced by a four-region approach. The NDF will be presented on a four-region basis comprising North, Mid, South West and South East regions.</p> <p><b>Financial Implication:</b> None.</p>

## 7. Integrated Sustainability Appraisal and Habitats Regulations Assessment

- 7.1 The Integrated Sustainability Appraisal (ISA) is a method of assessing the wider impacts of NDF outcomes, strategy and policies, and a means of ensuring they contribute to the Welsh government’s cultural, economic, environmental and social ambitions.
- 7.2 Draft NDF policies were subject to ISA, and the revised policies and proposed new policies have also undergone ISA. A full ISA report and a non-technical summary are published separately. This section summarises the main outcomes of the ISA for each policy and notes how they were refined and improved as a result of the ISA.
- 7.3 The Habitats Regulations Assessment (HRA) is also a process that helps refine and improve policies. It assesses whether there is any potential for the plan to impact upon sites designated for supporting habitats or species of international importance, otherwise known as Natura 2000/Ramsar sites or European designated sites. A full HRA report is published separately. This section summarises the HRA for each of the proposed NDF policies.

Proposed Policy and main ISA conclusions	Integrated Sustainability Appraisal – detailed changes	Habitats Regulations Assessment
<p><a href="#">Policy 1</a> - Where Wales will grow  <a href="#">Policy 2</a> - Shaping Urban Growth and Regeneration – Strategic Placemaking</p>		
<p>The ISA concluded that over the short, medium and long term Policy 1 would result in many minor positive and significant positive effects across the ISA objectives, with some mixed effects on the Welsh language and minor negative effects on flood risk, air quality and water and significant negative effects on greenhouse gases and energy.</p>	<p>The recommendations from the ISA were reviewed and the following changes were made:</p> <ul style="list-style-type: none"> <li>• Supporting text amended to reflect the importance of universities in each of the region;</li> <li>• The benefits of Policy 1 on health and well-being strengthened in the supporting text;</li> </ul>	<p>The HRA screened out these policies as they are considered to be - <i>policies which are no more than general statements of policy or general political aspirations. (These) should be screened out because they cannot have a significant effect on a site.</i></p>

<p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 1.</p>	<ul style="list-style-type: none"> <li>• The benefits and opportunities from green infrastructure and active travel added to the supporting text for Policy 2;</li> <li>• The supporting text for policy strengthened to recognise the potential impacts on air quality from increasing urban development.</li> </ul>	<p>More details can be found in the HRA report.</p>
<p>Policy 2 would result in many minor positive and significantly positive effects across the ISA objectives and some mixed effects on air quality.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 1.</p>	<p>A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes. Appendix F of the ISA sets out the detailed assessment of these policies.</p>	
<p><b><u>Policy 3</u></b> - Supporting Urban Growth and Regeneration - Public Sector Leadership</p>		
<p>The ISA concluded that over the short, medium and long term Policy 3 would result in many minor positive and significant positive effects across the ISA objectives.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 2.</p>	<p>The recommendations from the assessment were reviewed, the following changes were made:</p> <ul style="list-style-type: none"> <li>• Policy 3 amended to reflect growth and regeneration.</li> <li>• Supporting text for Policy 3 strengthened to recognise the importance of active travel and public transport.</li> </ul> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p>

		Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.
<b><u>Policy 4</u></b> – Supporting Rural Communities		
<p>The ISA concluded that over the short, medium and long term Policy 4 would result in many minor positive and significant positive effects across the ISA objectives, with some mixed effects on the welsh language.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 1.</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened out this policy as it is considered to be - <i>policies which are no more than general statements of policy or general political aspirations. (These) should be screened out because they cannot have a significant effect on a site.</i></p> <p>More details can be found in the HRA report.</p>
<b><u>Policy 5</u></b> – Supporting the rural economy		
<p>The ISA concluded that over the short, medium and long term Policy 5 would result in many minor positive and significant positive effects across the ISA objectives.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 1.</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened out this policy as it is considered to be - <i>policies which are no more than general statements of policy or general political aspirations. (These) should be screened out because they cannot have a significant effect on a site.</i></p>

		More details can be found in the HRA report
<b><u>Policy 6</u></b> – Town Centre First		
<p>The ISA concluded that over the short, medium and long term Policy 6 would result in many minor positive and significantly positive effects across the ISA objectives and some mixed effects on air quality and historic environment and assets.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 1.</p>	<p>The recommendations from the assessment were reviewed and were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened out this policy as it is considered to be a - <i>policy listing general criteria for testing the acceptability / sustainability of proposals. These general policies cannot have any effect on a European site and should be screened out.</i></p> <p>More details can be found in the HRA report.</p>
<b><u>Policy 7</u></b> – Delivering Affordable Homes		
<p>The ISA concluded that over the short, medium and long term Policy 7 would result in some minor positive and significant positive effects across the ISA objectives, with a number of no direct impact identified.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 3.</p>	<p>There were no recommendations from the assessment for this policy.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened out this policies as it is considered to be a - <i>policy listing general criteria for testing the acceptability/sustainability of proposals. These general policies cannot have any effect on a European site and should be screened out.</i></p> <p>More details can be found in the HRA report.</p>
<b><u>Policy 8</u></b> - Flooding		

<p>The ISA concluded that over the short, medium and long term Policy 8 would result in many minor positive and significant positive effects across the ISA objectives, with a minor negative impact on biodiversity and geodiversity. More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 4.</p>	<p>There were no recommendations from the assessment of this policy.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA concluded that for the elements of the policy that fall under the National Strategy for Flood and Coastal Erosion Risk Management in Wales these can be screened out as the Strategy has already gone through the HRA process no further assessment is required – <i>proposals referred to but not proposed by the plan</i>. More details can be found in the HRA report.</p> <p>For any projects not associated with the National Strategy they have been screened in - <i>Policies or proposals which may have a significant effect on a site alone</i>. The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b>Policy 9</b> - Resilient Ecological Networks and Green Infrastructure</p>		

<p>The ISA concluded that over the short, medium and long term Policy 9 would result in many minor positive and significant positive effects across the ISA objectives.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 5.</p>	<p>There were no recommendations made for Policy 9.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b><u>Policy 10</u></b> - International Connectivity</p>		
<p>The ISA concluded that over the short, medium and long term Policy 10 would result in some minor positive effects across the ISA objectives, with some mixed effects on health and access and connectivity. There are uncertain effects around flood risk, landscapes and townscapes and historic environment and assets. Minor negative effects on water, biodiversity and geodiversity and natural</p>	<p>The recommendations from the assessment were reviewed, the following change was made:</p> <ul style="list-style-type: none"> <li>• Supporting text recognises the delivery of active travel.</li> </ul> <p>A number of the recommendations were addressed throughout the policies and supporting text within the plan or covered by PPW or Technical Advice Notes.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/</p>



<p>resources. Significant negative effects on greenhouse gases and emissions and air quality.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 6.</p>	<p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b>Policy 11</b> – National Connectivity</p>		
<p>The ISA concluded that over the short, medium and long term Policy 11 would result in many minor positive effects across the ISA objectives, with some uncertain effects around landscapes and townscapes and historic environment and assets. Mixed effects on biodiversity and geodiversity and natural resources. More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 6.</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the plan or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b>Policy 12</b> - Regional Connectivity</p>		

<p>The ISA concluded that over the short, medium and long term Policy 12 would result in many minor positive effects across the ISA objectives, with some uncertain effects around landscapes and townscapes and historic environment and assets. Mixed effects on biodiversity and geodiversity and natural resources.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 6.</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b>Policy 13</b> - Supporting Digital Communications</p>		
<p>The ISA concluded that over the short, medium and long term Policy 13 would result in many minor positive and significant positive effects across the ISA objectives, with some minor negative against landscapes and townscapes and historic environment and assets. A number of no direct impacts were identified.</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where</p>

<p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 7.</p>		<p>adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b><u>Policy 14</u></b> - Planning in Mobile Action Zones</p>		
<p>The ISA concluded that over the short, medium and long term Policy 14 would result in many minor positive and significant positive effects across the ISA objectives, with some minor negative against landscapes and townscapes and historic environment and assets. A number of no direct impacts were identified.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 7.</p>	<p>The recommendations from the assessment were reviewed, the following change was made:</p> <ul style="list-style-type: none"> <li>• The supporting text updated to reflect ongoing work in the mapping of these areas.</li> </ul> <p>Other recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be <i>a - Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>

<b><u>Policy 15</u></b> - National Forest		
<p>The ISA concluded that over the short, medium and long term Policy 15 would result in many minor positive and some significant positive effects across the ISA objectives.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 5.</p>	<p>The recommendations from the assessment were reviewed. The recommendations were addressed through the supporting text for policy 15.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be <i>a - Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<b><u>Policy 16</u></b> – Heat Networks <b><u>Policy 17</u></b> - Renewable and Low Carbon Energy and Associated Infrastructure <b><u>Policy 18</u></b> - Renewable and Low Carbon Energy Developments of National Significance		
<p>The ISA concluded that over the short, medium and long term <b>Policy 16</b> would result in some minor positive effects across the ISA objectives, with a number of no direct impacts identified.</p>	<p>The recommendations from the assessment were reviewed, the following change was made:</p>	<p>The HRA screened out <b>policies 16 and 18</b> as they are considered to be – <i>Policies listing general criteria for testing the acceptability/sustainability of</i></p>

<p><b>Policy 17</b> would result in some minor positive and significantly positive effects across the ISA objectives; some mixed effects on the economic objectives and biodiversity and geodiversity; and minor negative impacts on water, landscapes and townscape and historic environment and assets.</p> <p><b>Policy 18</b> would result in some minor positive and significantly positive effects across the ISA objectives; some mixed effects on the economic objectives and biodiversity and geodiversity; and minor negative impacts on landscapes and townscape and historic environment and assets.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 8.</p>	<ul style="list-style-type: none"> <li>• The word ‘economic’ removed from policy 17.</li> </ul> <p>A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of these policies.</p>	<p><i>proposals. These general policies cannot have any effect on a European site and should be screened out.</i> More details can be found in the HRA report.</p> <p><b>Policy 17</b> was screened in and taken through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p> <p>As well as the re-screening and appropriate assessment some key changes to the assessment were made including:</p>
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		<ul style="list-style-type: none"> <li>Increasing the buffers to 20km for the greater horseshoe and barbastelle bats; and</li> <li>Changes to the western boundary of pre-assessed area 8 to reflect the potential impact on bats.</li> </ul>
<b>Policy 19</b> - Strategic Policies for Regional Planning		
<p>The ISA concluded that over the short, medium and long term Policy 19 would result in many minor positive and significant positive effects across the ISA objectives, with some mixed effects on the Welsh language.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 9.</p>	<p>The recommendations from the assessment were reviewed, the following changes were made:</p> <ul style="list-style-type: none"> <li>Reference has been made to green infrastructure;</li> <li>The supporting text has been amended to define 'connectivity infrastructure'.</li> </ul> <p>A number of the recommendations were addressed throughout the policies and supporting text within the plan or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened out this policy as it is considered to be a - <i>policy listing general criteria for testing the acceptability/sustainability of proposals. These general policies cannot have any effect on a European site and should be screened out.</i> More details can be found in the HRA report.</p>
<b>Policy 20</b> - National Growth Area - Wrexham and Deeside		
<p>The ISA concluded that over the short, medium and long term Policy 20 would result in some minor positive and</p>	<p>The recommendations from the assessment were reviewed, the following change was made:</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be</p>

<p>significant positive effects across the ISA objectives, with some negative and significant negative effects on greenhouse gases and energy, flood risk, air quality, water, landscapes and townscapes, historic environment and assets, biodiversity and geodiversity and natural resources.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 10.</p>	<ul style="list-style-type: none"> <li>The supporting text has been amended to define 'connectivity infrastructure'.</li> </ul> <p>A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p><i>a - Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b><u>Policy 21</u></b> - Regional Growth Area - North Wales Coastal Settlements</p>		
<p>The ISA concluded that over the short, medium and long term Policy 21 would result in some minor positive and significant positive effects across the ISA objectives, with some negative and significant negative effects on greenhouse gases and energy, flood risk, air quality, water, landscapes and townscapes, historic environment and assets, biodiversity and geodiversity and natural resources.</p>	<p>The recommendations from the assessment were reviewed, the following change was made:</p> <ul style="list-style-type: none"> <li>The supporting text amended to define 'connectivity infrastructure'.</li> </ul> <p>A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be <i>a - Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure</p>

<p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 10.</p>		<p>compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b><u>Policy 22</u></b> - Green Belts in the North</p>		
<p>The ISA concluded that over the short, medium and long term Policy 22 would result in some minor positive and significant positive effects across the ISA objectives, with some mixed effects on historic environment and assets. A number of no direct impacts were identified.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 10.</p>	<p>The recommendations from the assessment were reviewed, the following change was made:</p> <ul style="list-style-type: none"> <li>• The supporting text amended to define 'connectivity infrastructure'.</li> </ul> <p>A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened out this policy as it is considered to be a - <i>general plan-wide environmental protection/site safeguarding/threshold policy. These are policies the obvious purpose of which is to protect the natural environment, including biodiversity, and/or to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any adverse effect on a European Site. They can be screened out because the implementation of the policies is likely to protect rather than adversely affect European sites and would not undermine their conservation objectives.</i></p> <p>More details can be found in the HRA report.</p>



<u><a href="#">Policy 23</a></u> - North Wales Metro		
<p>The ISA concluded that over the short, medium and long term Policy 23 would result in some minor positive and significant positive effects across the ISA objectives, with some mixed effects on the welsh language, uncertain effects on flood risk. Minor negative effects on water, landscapes and townscapes, historic environment and assets, biodiversity and geodiversity and natural resources.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 10.</p>	<p>The recommendations from the assessment were reviewed, the following change was made:</p> <ul style="list-style-type: none"> <li>• The supporting text amended to define ‘connectivity infrastructure’.</li> </ul> <p>A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<u><a href="#">Policy 24</a></u> - North West Wales and Energy		
<p>The ISA concluded that over the short, medium and long term Policy 24 would result in some minor positive and significant positive effects across the ISA objectives, with uncertain effects on flood risk and minor negative effects on water,</p>	<p>The recommendations from the assessment were reviewed, the following change was made:</p> <ul style="list-style-type: none"> <li>• The supporting text amended to define ‘connectivity infrastructure’.</li> </ul>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p>

<p>landscapes and townscapes, historic environment and assets, biodiversity and geodiversity and natural resources. More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 10.</p>	<p>A number of the recommendations were addressed throughout the policies and supporting text within the plan or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b><u>Policy 25</u></b> - Regional Growth Areas – Mid Wales</p>		
<p>The ISA concluded that over the short, medium and long term Policy 25 would result in some minor positive and significant positive effects across the ISA objectives, with minor negative effects on greenhouse gases and energy, flood risk, air quality, water, landscapes and townscapes, historic environment and assets, biodiversity and geodiversity and natural resources.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 11.</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be <i>a - Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p>

		Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.
<b><u>Policy 26</u></b> - Growing the Mid Wales Economy		
<p>The ISA concluded that over the short, medium and long term Policy 26 would result in some minor positive and significant positive effects across the ISA objectives, with uncertain effects on flood risk. Minor negative effects on greenhouse gases and energy, air quality, water, landscapes and townscapes, historic environment and assets, biodiversity and geodiversity and natural resources.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 11.</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<b><u>Policy 27</u></b> - Movement in Mid Wales		
<p>The ISA concluded that over the short, medium and long term Policy 27 would result in some minor positive and</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be</p>

<p>significant positive effects across the ISA objectives, with mixed effects on natural resources, uncertain effects on flood risk and minor negative effects on water, landscapes and townscapes, historic environment and assets and biodiversity and geodiversity.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 11.</p>	<p>the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p><i>a - Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b><u>Policy 28</u></b> - National Growth Area - Swansea Bay and Llanelli</p>		
<p>The ISA concluded that over the short, medium and long term Policy 28 would result in some minor positive and significant positive effects across the ISA objectives, with minor negative effects on greenhouse gases and energy, flood risk, air quality, water, landscapes and townscapes, historic environment and assets, biodiversity and geodiversity and natural resources.</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be <i>a - Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure</p>

<p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 12.</p>		<p>compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b><u>Policy 29</u></b> - Regional Growth Areas – Carmarthen and the Haven Towns</p>		
<p>The ISA concluded that over the short, medium and long term Policy 29 would result in some minor positive and significant positive effects across the ISA objectives, with minor negative effects on greenhouse gases and energy, flood risk, air quality, water, landscapes and townscapes, historic environment and assets, biodiversity and geodiversity and natural resources.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 12.</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b><u>Policy 30</u></b> - Green Belts in the South West</p>		

<p>The ISA concluded that over the short, medium and long term Policy 30 would result in some minor positive and significant positive effects across the ISA objectives, with a number of no direct impacts identified.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 12.</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened out this policy as it is considered to be a - <i>general plan-wide environmental protection/site safeguarding/threshold policy. These are policies the obvious purpose of which is to protect the natural environment, including biodiversity, and/or to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any adverse effect on a European Site. They can be screened out because the implementation of the policies is likely to protect rather than adversely affect European sites and would not undermine their conservation objectives.</i></p> <p>More details can be found in the HRA report.</p>
<p><b><u>Policy 31</u></b> - South West Metro</p>		
<p>The ISA concluded that over the short, medium and long term Policy 31 would result in some minor positive and significant positive effects across the ISA objectives, with minor negative effects on flood risk, water, landscapes and townscapes, historic environment and</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p>

<p>assets, biodiversity and geodiversity and natural resources.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 12.</p>	<p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b><u>Policy 32</u></b> - Haven Waterway and Energy</p>		
<p>The ISA concluded that over the short, medium and long term Policy 32 would result in some minor positive and significant positive effects across the ISA objectives, with mixed effects on historic environment and assets and natural resources and uncertain effects on flood risk. Minor negative effects on water, landscapes and townscapes and biodiversity and geodiversity.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 12.</p>	<p>The recommendations from the assessment were reviewed, the following change was made:</p> <ul style="list-style-type: none"> <li>• The policy text amended to include seascapes.</li> </ul> <p>A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation</p>

		measures required for lower tier plans or projects.
<b>Policy 33</b> - National Growth Area - Cardiff, Newport and the Valleys		
<p>The ISA concluded that over the short, medium and long term Policy 33 would result in many minor positive and significant positive effects across the ISA objectives, with some minor negative effects on greenhouse gases and energy, flood risk, air quality, water, landscapes and townscapes, historic environment and assets, biodiversity and geodiversity and natural resources.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 13.</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<b>Policy 34</b> - Green Belts in the South East		
<p>The ISA concluded that over the short, medium and long term Policy 34 would result in many minor positive and significant positive effects across the ISA</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p>	<p>The HRA screened out this policy as it is considered to be a - <i>general plan-wide environmental protection/site safeguarding/ threshold policy. These are policies</i></p>



<p>objectives, with a number of no direct impacts identified.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 13.</p>	<p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p><i>the obvious purpose of which is to protect the natural environment, including biodiversity, and/or to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any adverse effect on a European Site. They can be screened out because the implementation of the policies is likely to protect rather than adversely affect European sites and would not undermine their conservation objectives.</i></p> <p>More details can be found in the HRA report.</p>
<p><b><u>Policy 35</u></b> - Valleys Regional Park</p>		
<p>The ISA concluded that over the short, medium and long term Policy 35 would result in many minor positive and significant positive effects across the ISA objectives, with some mixed effects on landscapes and townscapes, biodiversity and geodiversity. Minor negative effects on greenhouse gases and energy, flood risk, air quality, water, and natural resources.</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be a - <i>Policies or proposals which may have a significant effect on a site alone.</i></p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure</p>

<p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 13.</p>		<p>compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>
<p><b><u>Policy 36</u></b> - South East Metro</p>		
<p>The ISA concluded that over the short, medium and long term Policy 36 would result in many minor positive and significant positive effects across the ISA objectives, with some minor negative effects on flood risk, water, landscapes and townscapes, historic environment and assets, biodiversity and geodiversity and natural resources.</p> <p>More details are set out in Tables 3-1 and 3-3 of the ISA report and Appendix F Table for Policy Grouping 13.</p>	<p>The recommendations from the assessment were reviewed. A number of the recommendations were addressed throughout the policies and supporting text within the NDF or covered by PPW or Technical Advice Notes.</p> <p>Appendix F of the ISA sets out the detailed assessment of this policy.</p>	<p>The HRA screened in this policy and took this through to appropriate assessment as it is considered to be <i>a - Policies or proposals which may have a significant effect on a site alone</i>.</p> <p>The NDF does not support any lower tier plans or projects where adverse effects on Natura 2000/ Ramsar sites cannot be avoided through mitigation and will ensure compliance with PPW 10 and TAN 5.</p> <p>Table 7 of the HRA report sets out proposed avoidance and mitigation measures required for lower tier plans or projects.</p>

