

# Draft National Development Framework

## 1. NDF Outcomes (chapter 3)

Q1. The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time. Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree

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

Agree with all of them

## 2. Spatial Strategy (policies 1 - 4)

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

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

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

We strongly support the policies to create properly integrated public transport and active travel networks and to develop new public service facilities of a significant scale in town centres. Our communities and town centres on Ynys Môn would benefit hugely from such developments. Holyhead as a major international port and key hub town needs greater prominence in the plan,

## 3. Affordable Housing (policy 5)

Q5. The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes. To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree

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

We agree with the statement that "the provision of affordable homes should become a key focus for housing delivery" and the commitment to "ensuring that new housing meets the needs of all members of society especially those unable to afford to buy on the open market". We also welcome the statement that Welsh Government is committed to increasing the delivery of affordable housing in the areas where it is needed and will use its funding, land, planning and housing policies to drive delivery. We would, however, like to see an explicit statement declaring that Welsh Government will explore all avenues to ensure that local authorities build an appropriate amount of good quality, zero-carbon council housing along the lines of the Norwich scheme that recently won the Stirling Prize.

#### 4. Mobile Action Zones (policy 6)

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

*No Response*

#### 5. Low Emission Vehicles (policy 7)

Q9. To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Agree

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

In our opinion the delivery of charging infrastructure for ultra-low-emission vehicles needs to proceed at a much quicker pace than is envisaged in the Draft NDF. The statement that the pace and geography of the delivery of charging infrastructure should be kept under review in rural areas is inadequate. People in rural areas need to be fully and promptly assisted in making the switch to ultra-low-emission vehicles, especially bearing in mind the inadequacy of public transport in many rural areas. The uptake of ultra -low emission vehicles is presently being suppressed by the lack of a suitable charging infrastructure. An urgent strategic assessment of the network is required to identify gaps, particularly in rural areas in North and West Wales away from the main road network.

#### 6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree

7. Renewable Energy and District Heat Networks (policies 10-15)

Q12. To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and solar developments		X					
District heat networks	X						

**Q13. If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?**

**Policy 9 – National Forest**

It has been acknowledged by the Intergovernmental Panel on Climate Change that afforestation and reforestation have a crucial role to play in removing carbon dioxide from the atmosphere and in the efforts to limit global warming to 1.5°C (IPCC Special Report "Global Warming of 1.5°C", 2018). With specific reference to the UK, a 2019 report from Harvard Law School (H. Harwatt and M.N. Hayek, "Eating Away at Climate Change with Negative Emissions – Repurposing UK agricultural land to meet climate goals") emphasised that the restoration of native forests is vital if the UK's climate change goals are to be met.

Ynys Môn CLP therefore very much welcomes the concept of a National Forest for Wales and would like to see an ambitious goal for annual planting. While recognising that various land use issues, especially relating to agriculture, represent a constraint and need to be taken into account, we also believe that there may be scope to aim for a target beyond the proposed 2000 hectares. Here, we note Stop Climate Chaos Wales' call for "An increase of 5000 hectares per year in tree cover in urban areas, on farms, and in the uplands" and Woodland Trust Cymru (Coed Cadw)'s call for an urgent increase in tree cover to help address the climate emergency and the well-documented collapse of nature. We would also point out that tree cover on Ynys Môn, at 4-5%, is very low compared with other areas. A national forest should span regions across Wales, and we wish to see more tree cover on our island. We therefore look forward to seeing more concrete proposals regarding the National Forest at the earliest possible date.

**Policy 10 – Wind and Solar Energy in Priority Areas**

The Labour Party wishes to see a doubling of onshore wind and a tripling of solar power, along with a sevenfold increase in offshore wind capacity. We consider the rapid achievement of these goals to be essential, given the well-documented climate emergency and the need to protect the health and well-being of future generations, as well as endangered species. Ynys Môn CLP therefore welcomes the proposal that there should be a presumption in favour of large-scale onshore wind and solar energy in identified priority areas, with the proviso that the envisaged increases in onshore wind and solar power are in accordance with the aforementioned Labour Party goals. We would not welcome blanket coverage with wind and solar farms that would represent industrialisation of the countryside.

In the context of Ynys Môn, a doubling of wind energy would equate to a further ca. 40 MW of installed capacity, which could potentially be provided by 27 1.5-MW turbines with a hub height of ca. 70 m. We feel that such an increase could be accommodated within the proposed priority area, but would stress that a number of factors will need to be taken into account when deciding upon individual proposals, including, in particular, impacts on designated nature conservation sites and on residents. We therefore look forward to seeing detailed associated guidance designed to ensure that the required new onshore wind energy is sited appropriately.

As regards solar, a large 49.9 MW scheme was approved at Llanbadrig in 2017, and there are other significant solar farms, including a 15 MW scheme at Tai Moelion Farm on the Bodorgan Estate. A tripling of solar power on the island may therefore be considered ambitious, but it might be achievable if that goal were to include proposals already in the pipeline, such as the Parc Solar Traffwll Ltd proposal for 49.9 MW development in western Ynys Môn (which, however, needs close scrutiny owing to its proximity to lakes and a wetlands nature reserve).

Overall, we welcome this significant step towards decarbonising electricity generation, especially bearing in mind that onshore wind in particular has effectively been blocked in large parts of Wales for the past several years by very restrictive local development plans and supplementary planning guidance.

## **8. The Regions (policy 16)**

**Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale? The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.**

Agree

## 9. North Wales (policies 17-22)

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

Agree

## 10. Mid and South West Wales (policies 23-26)

Q16. Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro. To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Neither agree nor disagree

## 11. South East Wales (policies 27-33)

Q17. In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport. To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Neither agree nor disagree

**Q18. If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.**

**Policy 22 – North West Wales and Energy**

We welcome the fact that Welsh Government supports North West Wales as a location for new energy development and investment. We agree that new energy-related development should support local and regional communities and provide jobs and investment in training and skills and that there is a need to work with universities and businesses across the region and North West England to co-ordinate and maximise new investment to support the wider region.

Regarding the contentious issue of nuclear energy, we note that the National Infrastructure Commission has said it would be appropriate to support one more nuclear power station beyond Hinkley Point C before 2025, which could be Wylfa Newydd. We also note that in examining how we can decarbonise electricity generation sufficiently quickly, the latest (2019) National Grid and UK Committee on Climate Change reports both envisage a role for nuclear power.

Overall, however, we need a definite shift of focus away from nuclear and towards renewables, and particularly offshore wind. The Morlais and Minesto tidal power schemes also offer hope that tidal power could play a significant future role around the coast of Ynys Môn.

We wish to emphasise that some coastal communities of Ynys Môn are suffering from serious job losses, and it is imperative that the benefits of renewable energy are felt in these areas through job creation, skills training, and community benefits. Policy 22 contains statements on the potential benefits of nuclear to an area in terms of investment, skills, training and employment, but there is no such statement relating to renewables in North West Wales. This needs attention. There should be a North West Renewables/Low-Carbon Arc initiative, not simply a North West Nuclear Arc initiative!

The NDF identifies a range of important regional centres which, through specific policies in Strategic and Local Development Plans, should retain and enhance the commercial and public service base that make them focal points in their areas. This will apply in places like Carmarthen, the Pembrokeshire Haven towns, Aberystwyth, Llandrindod Wells, Newtown, Caernarfon, Bangor and the coastal towns from Llandudno to Prestatyn.

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.

**Policy 20 – Port of Holyhead / Policy 24 – Regional Centres**

We are very concerned that, although its "strategic gateway role" is recognised, Holyhead and surrounding area has not been identified as a Regional Growth Area/regional centre. This 'oversight' needs to be corrected. 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.

While we approve of the statement that Welsh Government will "work with port operators, local authorities and investors to support the development of the port and facilitate new investment in order to ensure that its strategic gateway role is maintained and enhanced", more needs to be done to promote development in Holyhead and other coastal towns such as Amlwch. These towns are ideally placed to benefit from jobs associated with offshore wind and tidal energy (as well as, potentially, Wylfa Newydd). Stimulation of manufacturing innovation and employment in these sectors is needed and this should be acknowledged explicitly.

We agree that investment to improve the port's capacity to accommodate cruise ships should be supported, but we also propose that a commitment to installation of cold ironing facilities should be made so that cruise ships can access low-carbon electricity and turn off the main and auxiliary engines while in the port.

## **12. Integrated Sustainability Appraisal**

Q19. As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development. Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

*No Response*

### 13. Habitats Regulations Assessment

Q20. As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds. Do you have any comments on the Habitats Regulations Assessment report?

*No Response*

### 14. Welsh Language

Q21. We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

*No Response*

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

*No Response*

### 15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

*No Response*

### 16. Are you...?

Q24. Are you:

Submitting a response on behalf of an organisation

## Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

<b>Name</b>	Andy Short
<b>Organisation (if applicable)</b>	Ynys Mon Constituency Labour Party
<b>Preferred contact details (email/phone/post)</b>	email

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

[REDACTED]

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

*No Response*