



**RTPI Cymru**

Royal Town Planning Institute  
Sefydliad Cynllunio Trefol Brenhinol

Royal Town Planning Institute  
Cymru (RTPI Cymru)  
Studio 107  
Creative Quarter  
8a Morgan Arcade  
Cardiff  
CF10 1AF  
Tel +44 (0)20 7929 8197  
email [walespolicy@rtpi.org.uk](mailto:walespolicy@rtpi.org.uk)  
Website: [www.rtpi.org.uk/wales](http://www.rtpi.org.uk/wales)

28 October 2019

e-mail response sent to: [planconsultations-a@gov.wales](mailto:planconsultations-a@gov.wales)

Dear Sir/Madam,

**Response to: Draft National Development Framework (NDF)**

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

The response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

The RTPI has long called for a spatial plan to enable Wales to make effective decisions on important national issues relating to housing, climate change, energy generation, the economy etc. and a spatial framework for investment, other government policy (i.e. spatial interpretation of policies such as energy and transport), Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

The National Development Framework (NDF) must provide the context and evidence for taking difficult national decisions and informing long-term investment goals, which will enable infrastructure decisions to be better integrated to support existing and new development, while taking into account climate change mitigation, adaptation and sustainable outcomes.

The NDF needs to cover all development decisions, including those outside planning, in order for all development to link up and the impacts and opportunities to be taken into account, for example there must be a relationship between the Wales Infrastructure Investment Plan (WIIP) and the NDF.

The new and very important relationship between Planning Policy Wales (PPW) and the NDF needs promoting by Welsh Government, beyond what is set out in the introduction of the draft NDF, to provide clarity for users of the system. This will help the smooth delivery of policy goals and create more certainty for all stakeholders.

We welcome the draft NDF and support its intentions. We recognise the challenge of having to achieve a sustainable pattern of development for the longer term, with the 20-year time constraint of the plan, while taking into account the climate change agenda that requires us to look beyond the 20-year horizon and develop policies to achieve a longer-term objective for an uncertain future.

However, we feel Welsh Government has missed an opportunity to push boundaries in its longer term planning for Wales and in taking action against climate change. The draft NDF is a welcome start, showing there is a clear intent to tackle climate change, but this needs to be backed up with stronger evidence, detail and clarity to guide decisions - given the NDF will form part of the development plan. In order to start to address the issues surrounding climate change, RTPI Cymru believes that we need a framework that can guide a behavioural change across the industry in the way that we approach planning and developing the places we live, work and enjoy. The recent report from the Intergovernmental Panel on Climate Change, titled 'Climate Change and Land' (August 2019) <https://www.ipcc.ch/report/srccl/> sets out compelling evidence of the need for change. The NDF is the document which can guide that change and we urge Welsh Government to be bolder in its approach to long term planning and managing climate change in Wales.

RTPI Cymru's response to the consultation questions are set out below. If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Roisin Willmott at [walespolicy@rtpi.org.uk](mailto:walespolicy@rtpi.org.uk)

Yours sincerely,



Dr Roisin Willmott OBE FRTPI  
**Director**  
**RTPI Cymru**

## 1. NDF Outcomes (chapter 3)

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	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

The NDF sets out 11 outcomes, Welsh Government's ambitions for Wales. While the outcomes are well intentioned, we question where the statements of 'where we want to be in 20 years' are articulated in the rest of the document? The outcomes do not appear to have a clear, long term direction or actions associated with it.

There also appears inconsistencies in the outcomes set out on page 18 when compared to the detail provided on these outcomes at pages 20/21. They do not seem to read across easily.

We are also interested in the relationship between the NDF outcomes and the national sustainable place making principles. (See Annex B of PPW <https://gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf>) We appreciate they are both driving towards the same ambitions; however connections between the two would provide clarity.

Given national targets for housing we do not feel that it has a strong enough representation within the outcomes section, at this level. This is an example of where we feel there is poor read across.

While we support Welsh Government's work on decarbonisation, RTPI Cymru believes that we also need to look beyond where people live and carbon emissions and address the wider issues of climate change - the focus on decarbonisation in the NDF feels too narrow. For example, there needs to be clearer links with PPW on issues such as flood risk and coastal change given there will be a significant impact on some settlements from future rising sea levels.

Outcome 8 refers to 'broadband'. Should this have a wider digital infrastructure focus, given the long term vision of the plan and technological advances?

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

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	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

The NDF is clear in stating that its “strategic nature means it does not allocate development to all parts of Wales, nor does it include policies on all land uses” (page 6). We note and understand this position, however we suggest clear links and signposting to PPW in particular is included, for the reasons outlined in our covering letter.

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. We would suggest that wider sectors and stakeholders be more involved in the draft NDF and a stronger evidence base developed to support robust evidence based policies and direction.

It is with some concern that we note that the map at page 25 focuses primarily on what already exists. 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. The map does not appear to address future links between regions. This map and text could go further to highlight where transport development could emerge. It is disappointing that the NDF simply seeks to improve connectivity between south Wales/south west England and north Wales/north east England. A 20 year plan should set a strong and clear vision for improving the notoriously poor links between north and south Wales. Improving these links could have major benefits for Wales.

The NDF has the opportunity to demonstrate that economic growth and development can be achieved without generating growth in road traffic and its effects on congestion and carbon emissions, and this needs to be reflected more explicitly in its objectives. More effective mechanisms need to be found to link development approvals with the ongoing public transport services which will significantly determine the extent to which travel can be decarbonised.

Populating the NDF maps with more evidence based detail could help engage utility providers, the transport and energy sectors and other important partners, and indicate where investment is needed in the future.

We note the references to “new transport corridors” associated with Metro schemes and the support for the growth and development of Cardiff Airport. Linked to this, we question the need for a detailed, criteria-based policy for transport (roads, railways, airports) which are all potentially Developments of National Significance (DNS) projects.

Policy 32 sets out that “Welsh Government supports the growth and development of Cardiff Airport.”, while we are not questioning this policy in principle, there appears no justification for the balancing of this policy against wider sustainability goals and those set out in the document. It may be that this is documented elsewhere and could be referenced?

The draft NDF needs to address the imbalances between the regions and interregional relationships more clearly. In particular the term intra-urban connectivity shown on the map at page 25 requires further explanation.

The 'growth areas' shown on the map at page 25 are unclear because they cover vast areas of the south east and north east which could give the impression the whole area is identified for growth and major development. Perhaps a 'spots and dots' approach focussed on the main urban areas would be clearer?

The marine/land based planning systems around the coast will be increasingly important in the future. Page 15 of the NDF identifies Shoreline Management Plans (SMP) as an important plan identifying “opportunities to build ecosystems resilience and inform spatial choices in relation to development, taking into account erosion and current and future flood risks.” Links with the detail in PPW should also be made. In relation to coastal management, we would consider the framework for this process could be in place through the ongoing work on Area Statements and through resourced and updated SMPs and we encourage investment in these.

#### **Policy 4: Supporting Rural Communities**

The support for rural communities and affordable housing in rural areas are intrinsically linked (policy 4 & 5). While the introduction of the NDF (page 17) briefly notes the potential impact of the UK leaving the European Union on funding in rural areas, it might consider in more detail the potential loss of EU Common Agricultural Policy funding, and in west Wales and the Valleys etc, the potential loss of EU Structural Funds, mean that rural Wales could be facing unprecedented challenges to its economy and to its communities. This scale of change, together with climate change, means that a comprehensive agenda for sustaining and adapting rural Wales will be needed. Agricultural changes will need to be managed alongside opportunities to address flood risk at the catchment level, to enhance landscape, biodiversity and water quality, to promote carbon sequestration and to develop the tourism economy. The NDF must play a stronger strategic role in framing this.

### 3. Affordable Housing (policy 5)

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	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

The principles and aims in the policy are welcomed, but when reading the supporting text it is unclear how the policy will be achieved. For example, reference to the shift in delivery model - how will this be pursued and achieved?

There needs to be improved clarity of definitions and guidance on how regional estimates of need and assessment will be dealt with. It is also important to be clear on any read across that is required between this and other Welsh Government actions.

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

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

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

We note that the Mobile Action Zones are not set out in the draft NDF, with the text stating that these will be “identified”. Again as set out above, 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 the Mobile Action Zones in policy terms? Again, we would expect the NDF to set out any links with PPW on this matter.

## 5. Low Emission Vehicles (policy 7)

- 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?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

While there is support for this policy and approach, we raise concern regarding the 'action' stage and how and when the network of rapid charging points will be created. Much more detailed information is required.

Policy 7 is supportive of the transition away from petrol and diesel vehicles to ultra low emission vehicles, including electric vehicles (EV), and recognises the need for investment in charging infrastructure across Wales. Has Policy 7 properly considered the grid infrastructure required to deliver the power to the vehicles?

We need to engage with other sectors and parts of the UK on this policy, approach and longer term development.

Again we would expect links to be made with PPW on charging point detail.

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

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

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### **Policy 8: Strategic Framework for Biodiversity Enhancement & Eco system Resilience**

While the draft recognises the biodiversity crisis, the policy is ambiguous. Does this pass back to local areas or to Natural Resources Wales Area Statements?

Area Statements were introduced in the Environment (Wales) Act 2016, yet still appear to be in an engagement/evidence gathering stage. We would stress the urgent need for these documents to be finalised or become live, to enable the policy to be taken forward.

As above, the text in the draft NDF states “will identify areas” and again we call for a spatial approach and, where possible the same level of detail as that set out for wind and

solar. Again this raises questions around how they will be practically integrated into the NDF.

Further clarity is required in terms of the inter-relationships between policies and plans and in particular, has the difficult balance between sensitive biodiversity and energy Priority Areas been reconciled and is this clear to stakeholders?

Page 34 of the draft document covers strategic green infrastructure mapping and notes the indicative maps produced by Natural Resources Wales. Digital information on green infrastructure should be more widely available.

We note the reference to blue infrastructure at page 15 of the NDF; it would be helpful to have the reference to blue infrastructure also set out at policy 8.

The protection of the best agricultural land is an important natural resource for the future, for the economy and the environment. We acknowledge the detail on this in PPW. Again, links should be made on this subject.

**Policy 9: National Forests**

The text states “will identify appropriate delivery sites and mechanisms”. Again we call for a spatial approach and, where possible the same level of detail as that set out for wind and solar. We question whether Welsh Government can be certain of deliverability in instances where the spatial elements of policies in the draft NDF have not yet been considered? More detail on the means of delivery, funding, leadership and links with other plans and strategies would be useful here.

This section does not recognise commercial forestry.

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

- 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	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



- 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 10: Wind and Solar Energy in Priority Areas**

As stated throughout our response, a particular inconsistency in the draft document is the lack of detail and assessment on many of the topics, other than an incredibly detailed assessment of onshore wind and solar.

The NDF will be the development plan for DNS projects. We note the significant amount of detail on wind and solar generating stations but not on the other types of DNS projects (ports, railways, roads, other generating stations) and others as defined in The Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016 (as amended)). 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.

There are major onshore implications for infrastructure, servicing and supply links into the grid. We note the draft document recognises that "suitable access to the site for construction and maintenance purposes must be provided" but there is no mention of upgrading grid infrastructure if needed, or the need to ensure grid capacity can accept the renewable energy being planned for it.

We question what appears to be a simplistic traffic light approach and would suggest that more criteria based detail is needed.

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.

We understand that there are some concerns regarding deliverability in the priority areas. The priority areas identified under Policy 10 appear to provide a significant opportunity for wind and solar development. However, we understand that on closer examination it is apparent that the areas identified may not be deliverable in their entirety; this creates a false expectation and in turn has an impact on the deliverable area and the traffic light approach set out.

We refer to our comment above at question 6 regarding the inter-relationships and balance between policies.

Policy 10 and 11, uses the words 'maximised' and 'minimised' in respect of scheme benefits and impacts. Does this provide enough clarity to stakeholders?

### **Policy 13: Other Renewable Energy Developments**

We note that Welsh Government are currently preparing an Energy Atlas to "identify opportunities for all types of renewable projects", however the current draft NDF does not appear to recognize the full range of renewable energy technologies in use and instead has a specific focus on wind and solar. For example, the offshore wind potential in Welsh waters should be recognised in the plan. We question how Welsh Government see other renewables playing a role in the future in lowering carbon emissions in Wales. Policy 13 requires further detail and strengthening.

## 8. The Regions (policy 16)

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

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

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

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?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

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

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 16 states "The Welsh Government requires SDPs to come forward in each of the three regions to deliver the requirements of this policy." RTPI Cymru disagrees with this policy. We believe that parts of Wales may not need the addition of another plan layer. We support SDPs in areas where there is complex movement across boundaries. We suggest that SDPs come forward in these areas.

Complexity of movement in the regions should be considered in more detail and the impacts of this for SDPs.

While the draft NDF recognises that "more than a fifth of our population was born in England. People travel daily in both directions to work, to shop, to socialise and access services and institutions." (page 14) It should also be recognised in the document that there are planning issues in England that require a response and long term plan from Wales, for example greenbelts and growth from England affects Wales - north east Wales and Cheshire is an example of this. The scrapping of tolls on the Severn Bridge has also had a significant impact on south east Wales in terms of transport, housing and congestion issues.

We note the detail around green belt and green wedge contained in PPW and the proposals for new areas of green belt in the draft NDF. It would be helpful if the NDF gave an evidential reason for introducing green belt or balancing this against existing green barrier/wedge policies.

There needs to be a much stronger appreciation of the importance of the cross border link between north/east Wales and the Chester/Cheshire and the Northern Powerhouse beyond. The national boundary at Flintshire/Chester is indiscernible with both areas intrinsically linked in terms of housing, employment, retail and recreation/entertainment. Transportation in the Chester/Deeside/Wrexham triangle is key and this must be highlighted in stronger terms. Clear guidance must be given on the level of cooperation required and expected between the authorities when preparing and reviewing their development plans and transport strategies. A clearer definition of Deeside is required, as the reference at page 49 doesn't clearly state what Deeside comprises. Further consideration should be given to the possibility of Wrexham as a suitable location for higher level service development.

The Cambrian Mountains are not featured in the NDF. We raise whether this should be a designated area.

In North Wales is there a missed opportunity to recognise Holyhead as a regional growth area? Will this affect Anglesey if North West Coast towns are the focus?

Wylfa Newydd needs to be recognised in the plan, as if this comes forward as a development it will have significant implications for grid connections, transport and housing

The absence of a transport dimension for the Swansea Bay City Deal leaves a particular strategic planning deficit which needs to be addressed

We note that Barry in south east Wales, whilst in the growth area is not recognised as a centre of regional growth.

### **Integrated Sustainability Appraisal**

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 comment

### **12. Habitats Regulations Assessment**

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 comment

### **Welsh Language**

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?

We question the impact of the NDF on the Welsh language in concentrating growth in areas where the proportion of Welsh speakers is lower. It is important to consider this impact in the longer term, given there is no clear NDF policy on Welsh language.

Pages 15-17 makes little reference to the challenges and opportunities around culture, including Welsh language, yet the NDF outcomes mention these. There should be reference to such issues first, before identifying outcomes.

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.

No comment

### 13. Further comments

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

#### **Introduction (page 6)**

The introduction of the draft NDF covers the purpose of the plan, i.e. a spatial plan to direct/influence the content of SDPs and LDPs, but it should also note in this section that it is the primary development plan against which DNS and, in the future, the onshore Welsh Infrastructure Consents (WIC) will be determined.

The “Model of NDF Influence” at page 11 of the draft NDF is useful, however there is little mention of the National Infrastructure Commission for Wales or the WIIP beyond this table. It is vital that the NDF explicitly links to these throughout the document, where relevant. Links could also be made with PPW, SDPs, LDPs and the LDP Manual etc throughout the document.

The table in the consultation document under the heading “This Consultation” could also be utilised as an Annex to the NDF -

<https://gov.wales/sites/default/files/consultations/2019-10/draft-national-development-framework-consultation-document.pdf> Highlighting the links and relationships between the relevant plans would provide clarity to all stakeholders and help engage those important sectors and stakeholders that sit outside of planning. It is also therefore important that all plans, strategies, policy and guidance are kept updated.

#### **An Overview: Challenges and opportunities (page 12)**

Overall, this section of the document is not well structured and as a result could be confusing to users. The document lists topics of importance on pages 12-14, but also includes another sub section on pages 15-17 called 'challenges and opportunities', which is confusing.

#### **General Comments on the draft NDF**

While in the main we welcome the coherency of the document, the tone changes and terms such as ‘must’ and ‘should’ are interchanged between sections and policies.

We appreciate the compound semiconductor sector is important, but is the NDF the place to deal with this detail?

Many questions are raised around the plans to deliver set out in the NDF (e.g. developing a national forest, a network of rapid charging points, identifying mobile action zones). Would the document benefit from an annual monitoring, review and action plan?

There is little mention of how the NDF will be monitored and how its progress will be measured over the 20 years. Page 47 states “the Welsh Government requires progress on regional planning across Wales and as part of the monitoring of the NDF, will monitor formal progress on the preparation of SDPs.” It also confirms “Welsh Government will review and update the NDF every 5 years”. There is little other information on the monitoring and review of the NDF. This should be clearly set out in the final document.

**Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here**