



RTPI Cymru

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e-mail response sent to: ndf@gov.wales

Dear Sir/Madam,

Response to: National Development Framework – Issues Options and Preferred options

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.

We are very pleased to respond to this latest consultation on the National Development Framework (NDF) for Wales. The NDF will be a powerful tool in guiding strategic land use development and the provision of infrastructure in an integrated, sustainable and economically viable manner.

RTPI Cymru believes the NDF should set the framework for decision-making on major spatial planning policy and infrastructure at the national level. The content of the NDF needs to be strategic in nature, setting the context for taking difficult national decisions, at a much earlier stage than is currently the case. With a key interface with the Wales Infrastructure Investment Plan, the NDF should inform long-term investment goals and identify the strategic development consequences of major infrastructure, and the infrastructure consequences of strategic development. Importantly the NDF should lead on spatially integrating major investment decisions, and should support strategic and local development planning across Wales.

Our previous responses can be viewed on our website - <http://www.rtpi.org.uk/the-rtpi-near-you/rtpi-cymru/policy-in-wales/>

Our response to the consultation questions are set out below.

If you require further assistance, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,



Dr Roisin Willmott OBE FRTPi

**Director
RTPI Cymru**

Q1a	Do you have any comments on the findings of the Integrated Sustainability Appraisal (ISA) Interim Report?	X
	Yes	X
	No	
Comments		
<p>The structure and findings of the Integrated Sustainability Appraisal (ISA) are generally supported. The appendix B is helpful in summarising the stages of refining questions and findings.</p> <p>Listing documents is useful and demonstrates the breadth of existing material this plan needs to consider initially. However, making that critical link between key issues and outcomes/recommendations is vital. Whilst this is one of several stages in a longer, detailed process, the narrative and justification behind the conclusions could be enhanced within the ISA.</p> <p>The high-level nature of the assessment can be difficult to scrutinise in detail, in particular how conclusions have been reached between the assessment of different options.</p> <p>Whilst this is meant to be an objective assessment with a clear process to be followed, the spatial dimension, which is critical to this plan's success, is lacking. For example, mapping out different topics/issues which add a dimension to understanding the variations between options.</p> <p>There appears to be little reference to a number of factors including cross border linkages, City and Growth Deals; North Wales Economic Ambitions Board and impacts on National Parks and relationship to other policies for example Welsh Language, Children, Equalities and Active Travel.</p> <p>The only negative impacts are identified in Option 1, the economic/market-driven approach. This approach could be interpreted somewhat unfairly that an economic-driven approach would be harmful to the environment, whereas an environmental-driven approach (e.g. Options 3 or 4) would not be harmful to the economy? This appears to overlook the fact that there is more to an economic/market-led option than environmental harm. It should also take into account that there are regulations and other strategies that could provide the checks and balances to mitigate some of the perceived harms.</p>		

Q1b	Do you have any comments on the Habitats Regulations Assessment (HRA) Preliminary Screening Report?	X
	Yes	X
	No	
Comments		
<p>At this stage it is good to see wide assessment and consideration, but again without greater spatial visualisation it is difficult to ‘see’ how options could impact on habitats for better/worse without reaching very generalised conclusions.</p> <p>Certain basic assumptions can be made in terms of spatial distribution of certain designations, but this is such high level analysis at this stage without having a greater spatial understanding of what the preferred and alternative options would entail – although we note this is an early screening stage.</p>		

Q2a	Do you agree the NDF Vision is clear and, ambitious, yet realistic?	X
	Agree	X
	Neither Agree nor Disagree	
	Disagree	
Further comments		
<p>While we generally welcome and support the vision - point 2 in particular recognising different infrastructure types not just the conventional, and also cross-boundary, international outlook, we query whether it is spatially clear and ambitious.</p> <ul style="list-style-type: none"> • We suggest adding ‘green’ to infrastructure list on bullet point 2; • We suggest reference to Welsh language (we note the NDF has previously sought to separate Welsh language and Welsh culture out); • There should be recognition that the NDF brings together key strategic policies etc underpinned by the sustainable development commitment and the Well-being Goals; • The last bullet point is unclear and vague. The ‘regions’ element appears an overarching point rather than a bullet point. Promoting this above the bullet points would essentially revert the three remaining bullet points to broad economic, environmental and social aspects, recognising linkages and crossover. It would link with the PPW structure. 		

Q2b	Do you believe any changes to the NDF Vision are required? If so, what are they?	X
	Yes	
	No	
Comments		
<p>We note, in relation to regions, while North Wales and South East Wales have strong functional characteristics, this does not apply to the proposed Mid and South West Wales region. South West Wales has its strongest linkages with South East Wales, while Mid Wales links more substantively with the English Marches and Midlands than with the South West. The Wales Spatial Plan currently identifies six regions across Wales. The case for a reduction from 6 to 3 appears weak. Mid Wales and South West Wales each have their own distinctive characteristics and each have their own city deal / growth deal processes. We would recommend recognising them as distinctively separate regions.</p>		

Q3a	Do you agree with the NDF Objectives?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
<p>The scope of objectives generally seems wide ranging and comprehensive, but there does not appear to be a connection between the Vision, Well-being goals and the objectives. We question the source/background of the headings and why 'City Regions' are a separate objective and not included under Economic Prosperity?</p> <p>There is a need for greater consistency in the structure and content of the objectives. Some are outcome driven while others are generalised and open-ended statements of intent.</p> <p>We would like to see the list of objectives aligned with Planning Policy Wales (PPW). Consideration should be given to aligning the objectives around the Well-being goals which is referenced in the vision, or the four distinctive themes in draft PPW.</p> <p>Welsh Government need to consider how these objectives then translate into actions with spatial dimensions; this should be considered as this process is refined.</p>		

Q3b	Do you consider any additional objectives are required? If so, what are they?	X
	Yes	
	No	
Comments		
No comment		

Q3c	Do you consider any of the NDF Objectives should be amended or removed?	X
Yes		X
No		
Comments		
<p>Digital infrastructure is rightly highlighted but other infrastructure ‘types’ need reference too. Transport is mentioned but also includes the traditional types that still come under Welsh Government and Local Planning Authority (LPA) determination.</p> <p>Perhaps the objectives could be reviewed against the key strategies identified in the audit review and what the key objectives/targets are in each of those.</p> <p>Specific comments on the objectives are set out below:</p> <ul style="list-style-type: none"> • 3. City Regions: The absence of a transport dimension for the Swansea Bay City Deal leaves a particular strategic planning deficit which should be addressed. • 4. Rural Wales: The potential loss of EU Common Agricultural Policy funding, and in West Wales and the Valleys the potential loss of EU Structural Funds, mean that rural wales will be facing unprecedented challenges to its economy and to its communities. The objectives as presently specified are extremely limited, and will need greater articulation. This scale of change, together with climate change, means that a comprehensive agenda for sustaining and adapting rural Wales will be needed. Within rural Wales, a key area of focus in this context will be the uplands, where 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 can play a strategic role in framing this. • 6. Natural Resources etc: Key issues in this section include the omission of any objectives relating to water supply, and the absence of an agenda for the coast, other than supporting the Marine Plan. • 8. Transport: 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. • 8.2: This should be expanded to refer to improving transport infrastructure ‘and services’. 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. Wherever the document refers to "Transport infrastructure", it needs to refer to "Transport Infrastructure and Services". • 12. Cohesive Communities: Objectives under this heading could be more fully developed, particularly given that "Cohesive Communities" is one of the three spatial aspects of the Placemaking theme that the NDF will focus on. 		

Q3d	Do you have any comments on the assessment of the NDF Objectives as set out in the Integrated Sustainability Appraisal interim report?	X
	Yes	
	No	
Comments		
No comment		

Q4a	Do you agree the NDF Options have been considered appropriately, in order to identify key strengths and weaknesses, and inform the Preferred Option?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
<p>Please note our comments on Q1a in relation to the economic/market-driven option versus other options such as environmental.</p> <p>We do not believe the document adequately addresses the strengths and weaknesses of each option in sufficient detail.</p> <p>Spatial visual diagrams, charts, figures/plans would be helpful when considering options and alternatives.</p> <p>It is difficult to understand how the Appendix A issues translated into the Appendix B options. The link between these is unclear.</p> <p>The 'spatial dimension' also appears uneven. References are made to 'the whole of Wales' but without a greater understanding or description of how different options could impact different areas.</p> <p>The benchmark 'no change' option is important even if it has not been considered; the fact this has been recognised is welcome.</p> <p>While understandably the NDF Preferred Option is attempting to be comprehensive in its focus, as the process advances to the preparation of the Draft NDF, there will be a constant need to reflect on the principle of subsidiarity, where each of the issues addressed, is challenged by the question - "Is this issue really strategic at the national level, or is it more appropriately addressed through Strategic Development Plans (SDP) or Local Development Plans (LDPs)?" Only those proposals which pass this challenge should be included in the Draft NDF (subject to the progression of SDPs). Similarly, the NDF needs to be spatially defined - making choices between places, and identifying the best broad locations for future growth - but including only policies and proposals that are spatial. Other policies are more appropriately located in PPW.</p>		

Q4b	Do you have any comments on the assessment of the options as set out in the Integrated Sustainability Appraisal interim report and preliminary Habitats Regulations Assessment screening report ?	X
	Yes	
	No	
Comments		
No comment		

Q4c	Are there further alternatives/options that should be considered for the strategic direction of the NDF?	X
	Yes	
	No	
Comments		
Alternative/additional 'options' might be one based around connectivity and infrastructure including transport. Ensuring it is sufficiently different from Options 1 and 2, setting out perhaps an infrastructure and connectivity-led approach?		

Q5a	Do you agree with the NDF Preferred Option?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
<p>The spatial issues and policy directions overall seem reasonable, however, we raise concerns that there has been a lack of clear, detailed assessment of different options which led to the preferred option.</p> <p><u>Preferred Option:</u></p> <p>Placemaking - While the three aspects of this theme set out here are spatially implementable, there will be a need for spatial definition in the next stage of preparation of the NDF.</p> <ul style="list-style-type: none"> • DN5 – the recognition of nationally important green infrastructure is welcomed, but the term “green / blue infrastructure” would be preferable, recognising the ecological services contributed by rivers, lakes and other bodies of water. • P3 - the role of development plans in tackling inequality is highlighted in the second para. With inequality in access to transport being a key factor in the broader analysis of inequality, there is a strong case for adding "public transport services" alongside "health, education and digital infrastructure" in the 2nd paragraph. 		

- PE7 - While the main cross border interface is clearly with England, that with Ireland should also be identified, particularly with Brexit processes having the potential to generate new spatial issues for the ports of Fishguard, Pembroke Dock and Holyhead. The need for a strategic approach to the spatial issues associated with flood risk management across the border with England merit particular mention.
- PE8 - alongside the need for investment in new transport infrastructure, demand management in relation to road space also needs to be recognised as a factor in decarbonisation, improving air quality and tackling road traffic congestion. The NDF should spatially map out demand management corridors as well as locations of new transport infrastructure.

Q5b	Do you have any comments on the assessment of the NDF Preferred Option as set out in the Integrated Sustainability Appraisal interim report and preliminary Habitats Regulations Assessment screening report ?	X
	Yes	
	No	
Comments		
No comment		

Q5c	Do you agree all the NDF Objectives are adequately addressed in the NDF Preferred Option?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
No comment		

Q5d	Do you agree the NDF Preferred Option complements the NDF Vision and has the potential to help deliver it?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
No comment		

Q5e	Do you agree it is important for the NDF and Planning Policy Wales (PPW) to adopt similar and complementary structures, to help make clear links between the two documents?	X
	Agree	X
	Neither Agree nor Disagree	
	Disagree	
Comments		
The NDF and PPW must be complementary, but every effort should be made to avoid duplication and repetition. There is currently ambiguity between each document (Draft PPW and NDF) and the right issues/detail/policies have not been set at the right scale.		

Q5f	The NDF Option is developed around 5 themes, reflecting the structure of PPW: Placemaking; Distinctive & Natural Places; Productive & Enterprising Places; Active & Social Places; Wales' Regions. Do you agree with this approach?	X
	Agree	X
	Neither Agree nor Disagree	
	Disagree	
Comments		
Yes, we support the read across between the NDF and national planning policy in PPW.		

Q5g	Do you agree with the Spatial Issues and Strategic Policy Direction outlined within the NDF Preferred Option?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
We generally support the issues and directions. With regard to AS3 (housing), clarification will be required on what figure(s) for housing will be provided. Will this cover all housing including market and affordable housing? Will the figures be a basic standard calculation methodology and what assumptions will the range make? This is very important and we assume PPW will reflect this approach.		

Q5h	Do you agree the NDF Preferred Option offers a basis for the co-ordinated delivery of Welsh Government priorities outlined in <i>Prosperity for All: the national strategy</i> ?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
No comment		

Q5i	Do you agree the NDF Preferred Option could be formulated or changed so as to have 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?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
No comment		

Q6a	Do you agree with the proposed changes to the Statement of Public Participation?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
No comment		

Q6b	Are there any other changes we should make to the Statement of Public Participation?	X
Agree		
Neither Agree nor Disagree		
Disagree		
Comments		
No comment		