

Submission of Evidence Form – National Development Framework

Name

Caerphilly County Borough Council

Contact details

Dave Lucas
Principal Planner
Caerphilly County Borough Council
Tredomen House
Tredomen Business Park
Ystrad Mynach
Hengoed
CF82 7WF

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Title of evidence

National Development Framework for Wales – Call for Evidence and Projects

Summary of evidence

Issues for consideration in the NDF (please see attached Report)

Summary of key issues/conclusions

Please Refer to attached Report

Why have you submitted this evidence?

To assist in the NDF preparation to ensure that the NDF encompasses all relevant issues

How should this evidence inform the development of the NDF?

Assist in identifying the issues and matters that the NDF will address

How does this evidence and any actions it recommends help achieve the 7 well-being goals?

The Well-Being Goals will be met by addressing all relevant and appropriate matters

Why is the evidence of national significance?

Because it addresses NDF content.

Do you agree for your evidence to be made public? (Only evidence that can be made public will inform the development of the NDF)

Yes

National Development Framework for Wales – Call for Evidence and Projects

1 Introduction

- 1.1 The Planning (Wales) Act 2015 requires the Welsh Government (WG) to prepare and maintain a National Development Framework for Wales (NDF). As part of the process of preparing the NDF, WG has commenced a consultation process seeking input and comment in respect of evidence to support the NDF document and to identify strategic projects for consideration for inclusion in the NDF
- 1.2 This document broadly sets out the remit of the consultation and the timescale for responses. The consultation seeks to identify evidence that could potentially be used to inform the preparation of the National Development Framework for Wales (NDF), especially in respect of strategic development policies that will be contained within it. The consultation also seeks to identify nationally important projects that will need to be addressed through the NDF. The deadline for submissions in respect of the consultation is 7 March 2017.

The National Development Framework

- 1.3 The National Development Framework will replace the Wales Spatial Plan as WG's principle land use strategy for Wales. The NDF will set out a 20 year plan for Wales, accommodating WG's future priorities into a single and coherent strategy that will spatially identify key goals and objectives. It is proposed that the NDF will include strategic planning policies and will also identify projects of a strategic level to Wales as a whole. The NDF will concentrate on development and land use issues of national significance, which the planning system is able to influence and deliver, and will:
- set out where nationally important growth and infrastructure is needed and how the planning system - nationally, regionally and locally - can deliver it
 - provide direction for Strategic and Local Development Plans and support the determination of Developments of National Significance
 - sit alongside Planning Policy Wales, which sets out the Welsh Government's planning policies and will continue to provide the context for land use planning
 - support national economic, transport, environmental, housing, energy and cultural strategies and ensure they can be delivered through the planning system
 - be reviewed every 5 years
- 1.4 The NDF will form part of the statutory development plan, in conjunction with Strategic Development Plans (where prepared) and Local Development Plans. To facilitate this position WG is currently reviewing national guidance in respect of the preparation of development plans that will require Strategic and Local Development Plans to be in general conformity with those plans further up in the hierarchy.
- 1.5 The process for preparing and approving the NDF will include a statutory twelve week public consultation period. At the present time the NDF will not be subject of independent scrutiny through an examination process. The National Development

Framework, in line with other development plans, will have a fixed time period at the end of which it will cease to have effect as a development plan

The Call for Evidence

- 1.6 To assist in the consultation WG has issued a consultation document entitled '*Call for Evidence and Projects – National Development Framework*' which provides background to the consultation and advice on the submission of information. The deadline for submissions to WG is 7th March 2017.

2 Integrating with National Strategies, National Guidance and Regional Bodies

- 2.1 The NDF will need to take into account the provisions of a number of existing strategies and guidance documents in setting out its aims and objectives. The key documents are considered below:

Wales Spatial Plan 2008

- 2.2 The Wales Spatial Plan, which the NDF will supersede, was last reviewed in 2008. The broad principles of the Wales Spatial Plan remain largely unchanged in that it:
- ensures that decisions are taken with regard to their impact beyond sectoral or administrative boundaries and that the core values of sustainable development is enshrined;
 - sets the context for strategic, local and community planning ;
 - influences where WG spends money through understanding the roles of and interactions between places;
 - provides a clear evidence base for the public, private and third (voluntary) sectors to develop policy and action.
- 2.3 One of the core principles of the Wales Spatial Plan is that development should be sustainable. The WSP provides the following definition for sustainable development "*Sustainable development is about improving wellbeing and quality of life by integrating social, economic and environmental objectives in the context of more efficient use of natural resources.*" The WSP seeks to integrate social, economic and environmental objectives in the context of more efficient use of natural resources, which is in line with the current requirements set out in the Well-being of Future Generation (Wales) Act.
- 2.4 The WSP aims to deliver sustainable development through its area strategies and cross-cutting national spatial priorities. To date these have provided the context for the application of national and regional policies for specific sectors, such as health, education, housing and the economy, reflecting the distinctive characteristics of different sub-regions (areas) of Wales and their cross-border relationships. The WSP identifies 6 sub-regions in Wales, although these are not rigidly spatially defined. Caerphilly forms part of the South East Wales – Capital Region strategy area, the area now identified as the Cardiff Capital Region.
- 2.5 The NDF will supersede the WSP as the principle land use strategy for Wales. The NDF will continue with the principle of sustainable development, which is now a duty on all public bodies in Wales as a result of the requirements set out in the Planning (Wales) Act 2015. The NDF will address the issue of sustainable development

through the 7 national well-being Goals set out in the Well-being of Future Generations Act 2015. These goals seek to ensure that public bodies improve the social, economic, environmental and cultural well-being of Wales through their actions and decisions and WG will need to take them into account in preparing the NDF. The Well-being Goals are:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A More Equal Wales
- A Wales of Cohesive Communities
- A Wales of vibrant culture and thriving welsh language
- A globally responsible Wales.

The Wales Transport Strategy – One Wales: Connecting the Nation

2.6 The Wales Transport Strategy (WTS) was published in 2008 and sets out the approach for delivering transport throughout Wales. The WTS sets out a series of priorities to be addressed through transport provision in the future, namely:

- Reducing greenhouse gas emissions and other environmental impacts
- Integrating local transport
- Improving access between key settlements and sites
- Enhancing international connectivity
- Increasing safety and security.

2.7 The WTS also sets out 17 Outcomes, identifying results that should be achieved when the strategy is implemented. The Outcomes are grouped into sustainable themes addressing social, economic and environmental issues. For each of the Outcomes a number of Key Actions are identified that represent interventions that will deliver their respective Outcomes. Together the Outcomes and Key Actions provide the national strategy for transport that will be further addressed in local Authority Local Transport Plans.

2.8 The WTS seeks to deliver transport improvements based on the principles of social justice, equality and sustainable development, providing a transport system vital for the economy and access to services, as well as aiming for positive impacts in its own right for the environment. The WTS seeks to deliver positive results both for our economic, social and cultural life as a nation, as well as contribute to world-wide moves to stem climate change.

2.9 In 2015 WG published the National Transport Finance Plan (NTFP). The NTFP built upon the Wales Transport strategy by addressing the delivery of identified existing transport schemes being undertaken by WG. The purpose of the NTFP was threefold, namely to:

- Provide the timescale for financing schemes undertaken by the Welsh Government

- Provide the timescale for delivering these schemes and detail the estimated expenditure required to deliver the schemes
- Identify the likely source of financing to allow delivery to take place

2.10 The schemes within the NTFP were grouped by timescales, with detailed assessments being provided for short term schemes to be delivered within 5 years of the publication of the document (2015 – 2020) and medium term schemes (beyond 2020).

Other National Strategies

2.11 The NDF will need to take account of a number of other national strategies in formulating a national landuse strategy. These strategies include:

The Climate Strategy for Wales

2.12 Published in 2011 this document sets out the national strategy for addressing climate change issues and adapting to climate change. This is a large topic area that has also realised a number of sub strategies addressing issues including energy generation.

Towards Zero Waste -One Wales: One Planet

2.13 WG's overarching strategy for waste, sets out how waste is to be managed in Wales to produce benefits not only for the environment, but also for the economy and social wellbeing of the area and its people. The strategy outlines the actions we must all take if Wales is to reach the Welsh Government's ambition of becoming a high recycling nation by 2025 and a zero waste nation by 2050

Vibrant and Viable Places

2.14 WG's overarching strategy for Regeneration seeks to ensure that "Everybody in Wales should live in well-connected vibrant, viable and sustainable communities with a strong local economy and good quality of life."

Wales Infrastructure Investment Plan for Growth and Jobs 2012

2.15 The Wales Infrastructure Investment Plan (WIIP) sets out WG's strategic investment priorities for economic and social infrastructure for the period through to 2015. The WIIP addresses funding priorities through analysis of sectoral investment plans. The WIIP initially covered the period up to 2015, but WG has subsequently published an update and monitoring report on the sectoral investment plans in the *Project Pipeline Update* published in February 2016. The WIIP is a key document for the delivery of the National Development Framework, setting out the spending priorities that will need to be made to deliver the national framework.

2.16 It is the aim of WG to set up a National Infrastructure Commission (NIC), whose remit will be to consider issues of national strategic infrastructure and its funding. It is proposed that the NIC will make recommendations to WG in respect of priorities and funding for future infrastructure projects. The work of the NCIS will need to reflect the NDF and its priorities.

National Planning Guidance

2.17 Planning Policy Wales (PPW), the Technical Advice Notes (TANs), circulars and policy clarification letters together comprise national planning policy. In preparing local development plans it is a requirement that the provisions of national planning policy and the Wales Spatial Plan are taken into account. They are also material

planning considerations in decision making by Welsh Ministers and the Planning Inspectorate.

- 2.18 The NDF will need to ensure conformity with national guidance. As a result changes to the guidance documents may be necessary to ensure this.

The City Regions

- 2.19 Caerphilly forms part of the Cardiff Capital Region, the city regions designated for south east Wales. The Cardiff Capital Region has progressed significantly since all 10 local authorities agreed to participate in 2015. The Capital Region has secured a City Deal finance package of £1.25 billion in conjunction with Welsh Government and the Westminster Government and all 10 authorities have now signed up to this agreement. A Joint Cabinet has been established to oversee the delivery of the City Deal and the delivery of the Capital Region aims and objectives and will be the decision making body for the Capital Region.
- 2.20 While it is important that the strategic aims and objectives of the Capital Region are included in the NDF it is essential that, in doing so, it does not compromise the power of the Joint Board to exercise its duties in decision making and delivery of the City Deal and Capital Region. As the specific nature and extent of the NDF has not been identified the relationships between the NDF and subsequent tiers in the hierarchy are unclear and there is a risk that, if care is not taken, that the nature of the NDF could curtail decision making abilities at subsequent tiers. Care should be taken to ensure this does not occur.

Developments of National Significance

- 2.21 Section 19 Planning Act 2015 makes provision for applications for Developments of National Significance to be made directly to Welsh Ministers rather than to a local authority. Developments of National Significance (DNS) are defined as being applications for the following types of development:
- Energy generating stations (10 – 50 Megawatts);
 - Underground gas storage facilities;
 - Facilities for Liquid Natural Gas;
 - Gas reception facilities;
 - Airports;
 - Railways;
 - Rail freight interchanges;
 - Dams and reservoirs;
 - Transfer of water resources;
 - Waste water treatment plants; and
 - Hazardous waste facilities.
- 2.22 Given their status as having national importance, it prompts the question whether these developments should be identified within the NDF. This contention is supported by the fact that the Act also makes provision for DNSs to be identified in the NDF. Whilst specific developments can be identified in the NDF in advance, the

provision for the determination of DNS also relates to applications for planning permission that are submitted on an ad hoc basis.

- 2.23 From the counter perspective it could also be contended that any project or proposal identified in the NDF should qualify as a DNS, as being identified in the NDF is a qualifying criterion. In order to avoid ambiguity or uncertainty the NDF will need to either specify that all projects identified are DNS or specifically identify those that are, and those that are not.

3 National Development Framework Content – What the NDF should include

- 3.1 The NDF will need to address issues of national strategic importance in order to provide the national framework for land use in Wales. However, not all issues are of a scale or importance that they should be addressed through the NDF. This section considers what areas and issues should be considered in the NDF, and which are better considered either through a Strategic Development Plan (SDP) or LDP. In considering which issues should be addressed, the overall aim of delivering economic growth whilst positively contributing to environmental improvement is a key consideration. The consideration below addresses principle issues and is not meant to be exhaustive.

National Strategic Issues

Digital Connectivity/Telecommunications/Superfast Broadband

- 3.2 Access to high speed digital communications is vital to continued economic prosperity and growth. The NDF should seek to establish a framework for the delivery of the national network throughout Wales that will provide all businesses with appropriate digital access.

National and International Travel

- 3.3 Whilst being a relatively small country, there are acknowledged deficiencies in the current transport network in linking north and south Wales. The NDF should address the issues that constrain north-south movement to increase internal connectivity.
- 3.4 Connectivity between Wales and surrounding countries (England, Ireland, Europe etc.) also needs to be considered through the NDF. Issues such as the Severn Bridge Tolls, ferry services operating to Ireland and Cardiff Airport providing flights to throughout Great Britain, Europe and further afield all need to be integrated to increase accessibility into and out of Wales. In particular there is an urgent need to improve the public transport links to Cardiff Airport from all parts of Wales.
- 3.5 The NDF will also need to consider transport infrastructure improvements related to growth areas required to deliver the social and economic goals of the WG. Areas of growth will place further significant pressure on existing infrastructure and the NDF is best placed to address the scale and nature of improvements required to serve these areas.
- 3.6 General transport improvements and issues are generally matters best addressed through local and regional interventions, rather than through a national strategy.

However there are a number of general transport issues with a national element, and these include:

- A national network of Electric Vehicle Charging Points
- A national network of coach stations/interchanges linked to key nodes in the national transport network
- The second M4
- Integrating the City Region transport networks

Active Travel

- 3.7 Provision for pedestrians and cyclists is generally a local or regional infrastructure issues. However, 1200 miles of the National Cycle Network (NCN) has already been delivered in Wales and further growth of the network is planned. Major additions to the NCN should be considered through the NDF, particularly where linkages between the NCN and identified growth areas would be beneficial.

Freight

- 3.8 The movement of freight within Wales and importing and exporting goods from further afield is a significant cost to the economy of Wales. The NDF should address the issue of Freight nationally, setting a framework for improvements and setting targets for modal split for transporting goods.
- 3.9 A key area to focus on is the network of ports that serve Wales. South and west Wales have numerous ports (Newport, Cardiff, Barry, Port Talbot, Swansea, Pembroke and Milford Haven) which contribute significantly to the economic prosperity of Wales by serving the major industrial areas in South Wales and beyond. Milford Haven is a particular issue, being a significant deep water port capable of accommodating the largest of oil tankers and heavy cargo haulers. Its location at the western edge of Wales raises issues in respect of accessibility that should be considered through the NDF

Economic Growth

- 3.10 A key aim for WG is continued economic growth and increasing prosperity throughout Wales. To achieve this, the NDF will need to consider the level of economic growth that should be sought and identify what provision for growth needs to be made to achieve it. The NDF should consider identifying areas of growth (not only for employment but also housing and ancillary facilities) on a national scale, ensuring that economic growth integrates with other key issues to form a comprehensive framework for realising economic goals.
- 3.11 The NDF should consider the employment market and identify growth sectors that will require new development to enable their growth. The spatial distribution of this provision is a key issue, and the opportunities for expanding on existing specialist areas should be considered.
- 3.12 Service sector employment is a key sector of employment that is not based on employment sites. Retailing and tourism are two areas that provide significant levels of employment throughout Wales and the NDF should not neglect addressing these sectors in considering the national framework for economic growth.
- 3.13 Other economic growth issues that the NDF should consider include:

- *Nationally significant Employment Sites* :- strategic scale employment sites that provide an employment gravity that will attract inward investment and provide significant knock-on effects
- *Enterprise Zones and Simplified Planning Zones*: – Derestricted planning areas where planning intervention is restricted and minimal providing the opportunity for fast and effective employment development.
- *Innovation Districts*:- Areas of concentrated specialised employment sectors that would benefit from being located with similar industries
- *National Anchor Company Network*: - A national strategy identifying and promoting key employers to locate at strategic points throughout Wales to act as catalysts for future growth and development.
- *National Network of business and conference centres*:- To support an improving and increasing economic base

3.14 The A465 Heads of the Valleys roads is one of the key transport corridors and international gateways for the South Wales economy. The upgrading and dualling of the A465 is one of the most significant infrastructure investments in Wales in recent years. The upgrading and dualling of the A465 amounts to £1 billion (including committed spend on the Dowlais Top to Hirwaun section due to be completed in 2022), and is as significant an investment as the City Deal investment. The NDF should seek to address opportunities on the A465 to maximise the benefits of this investment, including significant employment generation, revitalising tourism to provide a tourist destination rather than just catering for day trips, expanding leisure provision and promoting retail growth, accompanied by housing and social infrastructure development. The A465 corridor provides a significant opportunity to address the issue of poverty within south Wales and this should be encompassed within the NDF.

Settlements

- 3.14 A key consideration for the NDF should be a settlement hierarchy, based upon their respective functions and their proposed functions over the plan period. The NDF should also consider whether continuing with the identified hierarchy is the appropriate course of action to deliver continued economic growth, whilst positively contributing to environmental improvement.
- 3.15 As part of the consideration of the settlement hierarchy and developing a national strategy for economic growth, the NDF should consider the issue of whether one or more New Settlements/Towns provide the appropriate opportunity to assist in delivering the NDF goals. New Settlements/Towns are highly contentious, but have not been identified in the development arena for nearly 70 years and, whilst highly controversial, the NDF should not pass on the opportunity to seriously consider this issue.
- 3.16 Population and household growth are key matters in the consideration of landuse strategy at all levels. The NDF should address the issue of population and household requirements through its respective period. It should identify the level of population and numbers of dwellings required through its period. The Growth and Competitiveness Commission advocates that the Cardiff Capital Region “should keep pace with average population growth in the UK core cities.” Setting the strategic level of population and households will facilitate apportionment across the

local areas throughout Wales although this is not without complications. Some of Wales will be covered by City Regions, where a Strategic Development Plan can draw down and ascribe requirements to local authority or growth areas. However a significant part of Wales does not comprise part of any City Region and, as such, have no strategic level planning tool to apportion growth across local areas. The NDF will need to consider an appropriate way to address this issue.

- 3.17 The NDF should identify a network of integrated growth areas to accommodate significant levels of housing and employment growth, setting their respective scale and location through the national strategy.
- 3.18 The NDF should also consider identifying distinctive destinations and culture capitals at locations where enhancement of concentrated tourist facilities can realise significant benefits. Such facilities can be based on any customer generating activity, including the natural environment (coast and countryside), culture and heritage, action/adventure centres and events and festivals locations. This would fit into the settlement hierarchy based on the role and function of the respective places.
- 3.19 Currently provision for Gypsies and Travellers is addressed on a local area basis through LDPs. There are two types of provision for Gypsy and Travellers, namely permanent and transit provision. A criticism of this system is that transit provision is most appropriately considered at a higher than local authority level, to reflect the travel patterns that generate the need for transit places. The NDF could provide an overview of the transit patterns and establish a national strategy for the delivery of transit provision across Wales.

Social Infrastructure

- 3.20 The majority of social infrastructure is provided through services outside the remit of general planning and development, e.g. through social services or the health service. Accepting growth and identifying a strategic network of areas of growth will increase pressure on social infrastructure which should be taken into account in establishing the strategy. The NDF should consider the provision of social infrastructure from national perspective, including the following areas:
- Hospitals and specialist treatment centres
 - 21st century schools
 - 21st century prisons
 - Higher education including universities

Climate Change

- 3.21 This is a generic term used to cover issues relating to human impact upon the planet and the causes and impacts of global warming. Key issues under this umbrella include energy (use and generation), flooding and emissions.
- 3.22 Energy generation, particularly renewable energy generation, is a key issue for the NDF to address in setting the national framework. The NDF should identify the following:
- Strategic Areas of Search for Wind Generation
 - Key locations for conventional energy generation

- Strategic locations for energy from waste generation
- National Strategy for hydroelectric generation, including river turbines
- Key locations for tidal generation
- Key locations for PV generation

- 3.23 The NDF should also set the development framework and national position in respect of fracking, possibly identifying strategically important locations, and the landuse strategy issues relating to the move to a low carbon economy.
- 3.24 Coal remains a viable fuel for conventional energy generation and the NDF should set out the national requirement and identify broad areas where new extraction may be required or are suitable.
- 3.24 The Gas and electricity networks are related issues to the generation of power and a global position in respect of power generation and delivery should be considered as part of the NDF.
- 3.25 Emissions are a result of human activities, principally arising through transport, energy generation and industry. Reducing emissions will be inextricably linked to the source of the emission and the NDF position in respect of it. As such the NDF should consider the emissions impacts of the strategy in respect of these issues.
- 3.26 Notwithstanding weather pattern changes, the principal issue arising from climate change will be increased risks from flooding, both fluvial and coastal. The NDF should address the issue of national coastal and fluvial flood defences and identify any significant areas required for flood alleviation purposes.
- 3.27 Water supply and water connections are key issues in realising economic growth for Wales. Recent developments have encountered issues in respect of connections with sewers and water supply. Some of these issues have been caused by the need to improve infrastructure to meet increasing demand, and the limited resources that Welsh Water have to deliver those improvements. The NDF will need to ensure that such infrastructure is accessible to serve the proposed level and locations of growth.

Environment

- 3.28 Wales' environment is one of its most important assets, from built industrial landscapes to protected coastlines. Appropriate stewardship of these assets would contribute towards economic growth and prosperity, as well as realising positive benefits environmentally. The NDF has an important role in establishing a national strategy and framework to facilitate good stewardship.
- 3.29 Wales has a wealth of heritage, including World Heritage sites, Historic Parks and Gardens, Historic Landscapes and many local heritage assets including Listed Buildings and Scheduled Ancient Monuments. The NDF should seek to establish a national framework for these assets, linking them to opportunities for economic growth.
- 3.30 A key issue that the NDF should address is whether strategic Green Belts are required in Wales. Green Belts are permanently protected areas where the open nature of the land is protected in perpetuity. As a result Green Belts represent

significant and permanent barriers to development. The NDF will need to balance the need for growth with the need to protect constraint urban areas and Green Belts are one of a many ways of dealing with these issues.

- 3.31 Wales has a wide range of natural environments that contribute towards its unique identity. Area of ecological or geological importance are protected by a hierarchy of protection designations, ranging from European designations, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites, through national designations, including Sites of Special Scientific Interest (SSSIs), Regionally Important Geological Sites (RIGS) and Marine Conservation Zones (MCZs), to local ones such as Local Nature Reserves (LNRs) and Sites of Importance for Nature Conservation (SINC). Whilst the European and National designations are outside the remit of the NDF in terms of designation and the local designations are too localised, the NDF should consider linkages between and within designations through a national strategy for green and blue infrastructure. This would identify important areas where existing green (land) and blue (water) spaces should be protected and/or enhance to support the vibrancy of the designations.
- 3.32 Water management and flooding are key issues for Wales moving into the future, with changing weather patterns meaning there will be less water in rivers in the summer months and more water in the winter months than is currently experienced. This will raise significant issues in respect of the river environment in years to come. The NDF should consider these effects and establish framework that will enable the issues to be tackled and positive wider benefits to be realised for the environment.
- 3.33 In addition to the changing levels of water in the rivers, climate change will also increase the incidence and severity of flooding in Wales, both coastally and fluvially. Flooding issues are raised and considered in the Climate Change section above.
- 3.34 Welsh landscapes benefit from a range of protection measures from statutory designations, such as Areas of Outstanding Natural Beauty (AONBs) and National Parks to non-statutory local designation set out in LDPs, such as Special Landscape Areas (SLAs). However these landscapes also contribute significantly to the economy of Wales through tourism and sterilising such areas would be counter-productive. The NDF should consider setting a framework for enhancing tourist opportunities in these areas whilst maintaining the quality of the landscapes.
- 3.35 The NDF could also consider establishing a framework and strategy for other, less direct, issues such as dark skies and tranquil places.

Regional and Local Strategic Issues

- 3.36 Whilst the NDF should appropriately address national issues and strategy, there will be some regional and sub-regional matters that the NDF should appropriately consider and set the framework for their delivery.
- 3.37 City Regions have recently gained momentum, especially with the City Deal agreement for the Cardiff Capital Region. It is important that the overall aims and objectives of the City Regions accord and integrate with the NDF and that the NDF has taken account of the implications that may arise from the City Regions proposals, providing the framework for addressing key issues. The key City Region issues that the NDF will need to reflect are the need to address the housing needs

of the area, together with the economic growth and transport aspirations, which form the main building blocks for successful delivery of transformational change.

- 3.38 The City Regions only cover part of Wales and consideration should be given to whether the NDF will adopt a strategic role in these areas, setting regional requirements and targets to be disseminated at the local level. Doing this raises the potential for the NDF to be treated differently in some parts of Wales as opposed to others. However, not establishing a regional level framework in areas without the City Region element could result in a strategic vacuum in some areas.
- 3.39 The Cardiff Capital Region and City Deal will give rise to significant regional issues and projects that might appropriately be considered at a regional level through a Strategic Development Plan. However, there is no certainty that, given the timescales for delivery of City Deal that a Strategic Development Plan will be prepared in sufficient time to address such issues. In the absence of a Strategic Development Plan, the NDF will need to establish the Regional Framework within which local authorities can deliver City Deal outcomes. Consequently, relevant regional issues and projects will need to be elevated into the NDF to provide that Framework, otherwise there will be a framework void at strategic level that may compromise the efficient and effective delivery of City Deal.
- 3.40 Caerphilly County Borough is well placed to interact with WG in respect of the strategic issues and projects, as the Council's Corporate Director Communities is the lead on the City Deal Planning work theme and is responsible for delivering its planning outputs. As part of that role, the Director is in consultation with the City Deal Programme Board and the City Deal Cabinet will continue to liaise with WG in respect of regional issues and projects that the Cabinet consider should be addressed through the NDF. Through this integrated and iterative approach the strategic issues necessary to deliver development at the regional level can be supported and delivered, as appropriate, through the NDF.
- 3.41 Local issues will tend to be of a smaller scale and have much less impact than those issues requiring national attention. As a result it would be inappropriate for the NDF to address such issues. However, cumulative impacts of some local issues could be of such significance that they warrant regional and national consideration. For example:
- Air Quality: - the issue of deteriorating air quality, which is primarily a result of increased emissions. Economic growth will undoubtedly lead to an increase in the need to travel (more people means more journeys and more demand for travel) and transport emissions is one of the key factors in air quality. Increasing the need to travel has the potential to increase emissions further and, given that co-location of destinations (shops, employment, leisure, recreation etc.) is a sustainable goal, the potential to increase concentrations of different uses at specific locations, could increase the number of areas at risk of air quality failure. Caerphilly County Borough already has 2 designated Air Quality Management Areas resulting primarily from transport emissions.
 - Redevelopment of Industrial Legacy Sites: - the redevelopment of industrial legacy sites and / or the redevelopment of surplus employment land would result in significant areas of land being brought back into beneficial use across the whole of Wales. However the strategy for the re-use of such sites should have regard to their location, and those sites that are close to

public transport nodes should be afforded a higher priority than those that are not.

4 Conclusion

- 4.1 The NDF will set out the national landuse strategy and framework for Wales and, as such, it is important that it is supported by appropriate evidence and contains relevant and necessary policies and projects. Whilst this information is important, there are concerns regarding the ability to identify appropriate evidence and projects for the NDF when the nature and form of the NDF has not been specified. In considering appropriate evidence and policies a number of issues and subject areas that should be considered by the NDF have been suggested.
- 4.2 The Cardiff Capital Region will in future provide the footprint for future regional land use planning for south east Wales. In due course strategic land use issues and regional proposals will be addressed through a Strategic Development Plan. However given the timescales for the preparation of the NDF it is important that any regional proposals that have national implications are also addressed as appropriate within the NDF. It is important that Welsh Government works closely with all relevant stakeholders in the delivery of the NDF to ensure that it meets the objectives of not only of WG but also of its development partners.