



PENARTH TOWN COUNCIL CYNGOR TREF PENARTH

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Planning Policy Branch
Planning Directorate
Welsh Government
Cathays Park
Cardiff

1st March 2017

Dear Sir/Madam,

RE: Call for Evidence and Projects National Development Framework

Further to Consultation No: WG 29530 as detailed above. Penarth Town Council responds as follows:-

Penarth Town Council has considered the issues contained within the consultation document and in particular the outcomes listed. In respect of these outcomes, the following comments are requested to be accepted as the Council's response:-

Title of evidence

Penarth - [The Community and Town Council Sector interest in the NDF](#)

Summary of evidence

1. Avoiding the pitfalls of the Wales Spatial plan

Following the experience of Wales Spatial Plan, communities need confidence that the NDF will not suffer the same fate. A fairly clean slate has been provided but with the commitment with what emerges will be part of the development plan system and not just a material consideration. This poses many conceptual and practical problems which impact on communities. For instance the associated impact and legislation and permissions connected with energy projects which will follow identification in the Plan. You will need to take communities with you particularly as you rely on Ministerial sign off rather than the transparent process embodied in the Development Plan Inquiry System.

2. Learning from Evidence from elsewhere

There is already experience of what a National Level Plan might consist of in the form of Scotland's NDF-which contains specific aims besides spatial content - the spatial expression of the Government Economic Strategy, plans for infrastructure investment and the ambition "to create great places that support sustainable economic growth across the country".. This is to be achieved through- championing our most successful places and supporting change in areas where, in the past, there has been a legacy of decline. And "opportunities for rural development that will strengthen our communities, whilst securing investment in the unique assets of our coast and our islands".

Whilst much of this is alluded to in "Progressive Planning" we have yet to see a strong statement of purpose for example: to narrow the gap in economic participation between the best and worst performing regions and helping to supporting growth, addressing regeneration and improving connectivity spatially. Additionally, there should be mention of the mechanisms identifying the strategic development consequences of major infrastructure, and the infrastructure consequences of strategic development. As in Scotland the NDF should lead or be central to integrating major investment decisions.

In this respect the Plan should also try to relate to the framework proposed in the Future Generations and Well Being Legislation through for example under:

A Healthier Wales

Identifying Grade I and II agricultural as well as other Environmental Designations to ensure that this grading especially near Cities is used for food production. This is becoming increasingly important as we need to support more localised food distribution networks.

A Wales of Cohesive Communities

Investment in the regional transport network, particularly the public transport system, will have a key role to play in supporting projected growth and boosting the competitiveness of the regional economy.

Connectivity is as much the integration of modes as the identification of routes and infrastructure, improving journey times and reliability. Ultimately, developments should increase the attractiveness of public transport. Part of this should be hoping to improve cycle and walking friendly infrastructure, developing active travel networks to increase walking and cycling for local journeys.

It is important that these principles, besides the identification of strategic routes for all modes, are part of the narrative in the Plan. Based on the Scottish evidence and common sense understanding of the interests of the Sector any spatially significant intervention which impinges on their area will be of interest and should not be left to related plans and impact legislation before they know about it. Communities' will be interested in settlement hierarchy, growth centres, environmental protection, transport corridors, cross border linkages including those with Ireland- North and South, energy facilities and infrastructure-with an understanding of the impact and other consents and the development of sites which support soon to be redundant infrastructure

We also note that the Scottish Government has recently published Places, people and planning, a consultation on the future of the Scottish planning system. Given that the NDF has been in place for some time – the main issue is to move to Development Plan Status and providing an overall emphasis to be reflected in the Plan and its enhanced status. This up-grading of the Plan poses an easier task than starting from scratch but should result in the dilution of content compared with Scotland.

We note also that the Scottish Consultation includes several other contextual issues relevant to the status of this plan and its legitimacy-

- An Infrastructure First Approach
- Maintaining the NDF's role as the spatial expression of Scotland's Economic Strategy important
- The resolve to create a new right for communities to prepare plans for their own places - citing the English example.
- Look at how planning can improve its reputation as a visionary profession that creates great places for people. Leadership is central to this.

3. Tailoring Community Engagement

Whilst it is appreciated that the approval of the Plan is through Ministerial decision, sufficient time needs to be allowed for communities' to understand the process and make appropriate representations. This requires a tailored consultation free of jargon, acronyms and some recognition that 60 days is inadequate if done over holiday periods in the Summer and Christmas.

Having legislation on community empowerment, as is the case in Scotland, could strengthen opportunities for communities to have their voices heard in decisions that affect them and their local area, as well as scope to take ownership. Town and Community Councils also serve to play a vital role in this, providing the vital link between community voices and the Government.

With specific reference to Penarth we note that :

Headland Link

The Wales Coastal Path should be included in the NDF indicating the many locations where improvements and rerouting are needed. The Path passes along the Coast and Esplanade at Penarth but diverts inland at Penarth Head. There have been plans to provide a Headland Link around Penarth Head which are presently being revisited with Cardiff and the Vale of Glamorgan and the Welsh Government. These plans aim to overcome cost, environmental and landownership issues. We support the new initiative and believe it will not only provide a missing Link but enhance the tourist economies of both Cardiff and the Vale and encourage more walking and Cycling.

Lagoons

Proposals for Lagoons are being considered in the Bristol Channel. These should be included in the NDF. Following decisions at Swansea, a more extensive lagoon is planned for the water adjacent to Newport/Cardiff/Penarth. The lagoons, together with the measures necessary to achieve environmentally satisfactory solutions to impact on the marine and beach environments should be included.

Connectivity

In the wider area we note that the position in the settlement hierarchy and economic connections with Cardiff will be important. Penarth's contiguity with Cardiff should be considered in proposals in the Capital Region, Metro and the City Deal.

Strategic Sites In the Vale

Within the Vale of Glamorgan, proposals for the site at Aberthaw and airport expansion merit inclusion.

Cardiff Airport - Investment needs to made into improving connections to and from Cardiff Airport as well as improving the infrastructure of the airport, its terminal facilities, increasing capacity with incumbent carriers, developing long haul flight opportunities and tourism opportunities.

Yours Sincerely

A solid black rectangular box used to redact the signature of the Civic Support Officer.

Civic Support Officer

Submission of Evidence Form – National Development Framework

Name

Jane Hallett MRICS

Contact details

Email:

Date

06 March 2017

Title of evidence

Ministry of Defence comments for consideration in the National Development Framework

Summary of evidence

The Ministry of Defence is a long established landowner, employer and user of both rural and built estate in Wales which enables both key defence and national security needs to be met as well as providing wider community and economic benefits that align and support your Well-being Goals.

The Strategic Defence and Security Review 2015 confirmed the requirement for an enduring defence presence in Wales. MOD was also tasked to review its estate holdings and to identify estate assets that need to be retained, developed and invested in to support military capability but also to reduce its built estate assets by 30% by 2040 to achieve long term affordability. The strategy to achieve this rationalisation has now been completed and was published as the Better Defence Estate Strategy outlook (BDES) in November 2016.

MOD is now beginning the implementation phase of BDES and engagement with local planning authorities in Wales and across the UK is now underway to discuss the best way to develop the retained defence estate as well as to consult on the opportunities for those establishments and assets we are selling.

It is in this context of estate transformation that we feel that there are significant benefits for the local planning authorities in Wales and the MOD for there to be defence considerations referenced in the National Development Framework. This will ensure an informed, coherent and collaborative approach to be adopted and early identification for all parties on where synergies and in some cases constraints lie.

To achieve this level of knowledge and dialogue we would suggest that in the National Development Framework:

1. There is a requirement for Local Planning Authorities to take defence into material consideration as part of their Plan preparation and to ensure there are no significant adverse impact on defence interests as part of proposals being brought forward through local development plans; and
2. In preparing local development plans, ensuring that Local Planning Authorities make contact with MOD to elicit the latest information on the future of Defence sites in their area/region

Summary of key issues/conclusions

MOD is a key stakeholder in supporting and achieving a successful National Development Framework and Well-being goals

MOD is going through a major estate change programme and alignment with the National Development Framework is seen as being mutually beneficial

Why have you submitted this evidence?

Inclusion in the National Development Framework of the consideration of enduring Defence and national security requirements as well as those assets/sites which are in MOD's disposal programme will enable local planning authorities and defence to make informed decisions at the right time and that can enable the best outcomes for communities and stakeholders.

How should this evidence inform the development of the NDF?

Please see above

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

The establishment of a resilient and sustainable defence estate in Wales will be best placed to continue to support the Well-being goals

Why is the evidence of national significance?

The positive impacts from Defence presence across Wales is significant.

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

Submission of Projects Form – National Development Framework

Name

Contact details

Date

Interest in site

Details of landowner

Title of project

Summary of project

Location of project (Please attach location map)

What consents are required?

Consents already granted relevant to project

Public engagement to date

Has an environmental assessment been prepared? (Yes / No)

Are there any site designations or constraints affecting the site?

What is the delivery timescale for the project?

How would the project contribute to the delivery of the 7 well-being goals?
Why is the project of national significance?

Why is the project of national significance?

Do you agree for your project and any supporting information to be made public? (Only projects and information that can be made public will inform the development of the NDF.)