

## Submission of Evidence Form – National Development Framework

Name

Craig Mead

Contact details

[REDACTED]

Date

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Title of evidence

Torfaen County Borough Council National Development Framework –  
Consultation Response

Summary of evidence

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Summary of key issues/conclusions

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Why have you submitted this evidence?

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How should this evidence inform the development of the NDF?

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

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Why is the evidence of national significance?

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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

## **Torfaen County Borough Council National Development Framework – Consultation Response**

Please note that the response below reflects the submission made by Cardiff Capital Region City Deal Programme Board and the South East Wales Strategic Planning Group (SEWSPG) with additional Torfaen County Borough Council individual comments. These additional comments to the CCRC & SEWSPG response are highlighted in the sections below. With these inclusions Torfaen County Borough supports the submission made by CCRC & SEWSPG.

### **1. National Development Framework for Wales – Introduction**

- 1.1 The NDF will need to address issues of national strategic importance in order to provide the national framework for land use in Wales. This response considers what areas and issues should be considered in the NDF. In considering which issues should be addressed, the overall aim of delivering economic growth whilst positively contributing to environmental and social improvement is a key consideration. The considerations below addresses principle issues and is not meant to be exhaustive.

### **2. National Strategic Issues**

#### Digital Connectivity/Telecommunications/Superfast Broadband

- 2.1 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

- 2.2 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.
- 2.3 Connectivity between Wales and surrounding countries (England, Ireland, remainder of 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 and throughout the UK, 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 transport links (both public and private) to Cardiff Airport from all parts of Wales.
- 2.4 The NDF will also need to consider transport infrastructure improvements related to growth areas required to deliver the social and economic goals of the Welsh Government. 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.
- 2.5 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

Railway improvements – main line electrification from Swansea to Paddington and general upgrade of stations. Improvement to the valley and Marches lines and services.

The M4 relief road/M4 opportunities – J36, J34A, J34 (direct airport access and Five Mile Lane improvements), J28) – Park and Ride schemes along the M4 to relieve congestion in Cardiff and other areas

Integrating the City Region transport networks – Cardiff Capital Metro Scheme

### Active Travel

- 2.6 Provision for pedestrians and cyclists is generally a local or regional infrastructure issue. 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

- 2.7 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.

- 2.8 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

- 2.9 A key aim for Welsh Government 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. !

- 2.10 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 strategic locations and specialist areas should be considered.

- 2.11 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.

2.12 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 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

*Life Science Network*: - A national strategy identifying how the programmes being developed by Local Health Boards e.g. Clinical Futures Gwent and A Regional Collaboration for Health in South West Wales and Cardiff University's Innovation Campus, relates to the requirement for employment space for the Life Sciences sector in terms of demand and location.

2.13 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.

This should be underpinned by improvements to the mid valleys connection corridor within South East Wales.

Settlements

2.14 A key consideration for the NDF should be a settlement hierarchy, based upon their strategic location, connectivity, 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.

- 2.15 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 a number of New Settlements/Towns/Expansions provide the appropriate opportunity to assist in delivering the NDF goals. New Settlements/Towns/Expansions 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. The rewording of paragraph 9.2.7 in Planning Policy Wales, which is discouraging of new settlements on greenfield sites in Wales, should also be considered.
- 2.16 Population and household growth are key matters in the consideration of land use strategy at all levels. The NDF should give a lead on addressing the issue of population and household requirements (including affordable housing need) through its respective period. In conjunction with stakeholders, consideration should be given to identifying the level of population and numbers of dwellings required through its period. It might be appropriate for this to go hand in hand with a corresponding adjustment in the 5 year land supply requirement of TAN1 and how this is calculated and reported.
- 2.17 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.
- 2.18 The NDF should consider identifying a network of strategic integrated growth areas to accommodate significant levels of housing and employment growth, setting their respective scale and location through the national strategy.
- 2.19 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.
- 2.20 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

- 2.21 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 (and associated need for the provision of employment land for the Life Sciences sector)

21st century schools

21<sup>st</sup> century prisons

Higher education including universities

Social support structures

### Climate Change

2.22 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.

2.23 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 power generation

Key locations for PV generation

2.24 The NDF should also set the development framework and national position in respect of fracking, possibly identifying strategically important locations, and the land use strategy issues relating to the move to a low carbon economy.

2.25 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. Coal Legacy Regeneration sites should also be considered in the NDF and further detail is evidenced in Section 3.

2.26 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.

2.27 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.

- 2.28 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.

#### Environment

- 2.29 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.
- 2.30 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.
- 2.31 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 / constrain urban areas and Green Belts are one of a many ways of dealing with these issues.
- 2.32 Wales has a wide range of natural environments that contribute towards its unique identity. Areas 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 and **integrated** to support the vibrancy of the designations.
- 2.33 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.

- 2.34 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.
- 2.35 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.
- 2.36 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

- 2.37 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.
- 2.38 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.
- 2.39 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.
- 2.40 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.



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. This issue will also need to consider the interlinked problems of poor connectivity, site viability along with environmental improvements.

### **3. Submission of Projects – NDF**

- 3.1 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 that will 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.
- 3.2 The Cardiff Capital Region Cabinet are keen to work with WG in respect of the strategic issues and projects that will be incorporated in the NDF. Through this continued dialogue we would like to explore and agree a regional planning framework and understand the role the NDF has within this overall framework, thereby ensuring that any regional issues and projects that the Cabinet consider should be addressed through the NDF are included. 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. We would welcome the opportunity therefore to work further with Welsh Government once a firmer idea of what may or may not constitute a project of national significance has emerged.