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Please ask for/Gofynnwch am:
Direct line/Llinell uniongyrchol:
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07.03.17



Dear Sir/Madam

NATIONAL DEVELOPMENT FRAMEWORK

We welcome the opportunity to comment at this stage on the development of a National Development Framework for Wales. Individual local authorities will be submitting details of relevant evidence and projects as a response to your call for evidence; however we would like to set out issues which we would like to see considered by Welsh Government during the preparation of the NDF.

- There are areas of Wales that continue to be blighted by their industrial past impacting on the social, economic and environmental conditions for residents in those areas. Individually these sites are local in nature but together they reach a scale that we consider to be of national importance requiring a national policy response. Therefore, this is a matter that we consider should be reflected in the NDF.
- The NDF should reflect the growing regional economic agenda but should not be so prescriptive as to hinder any future plans for a statutory strategic development plans or non-statutory development plans.
- The WLGA would not want to see the NDF defining specific boundaries. Such action may cause difficulties for future LDPs and SDPs to evidence conformity with the NDF in situations where more detailed evidence gathered for the preparation of LDPs and SDPs indicates a different boundary. Given the national focus, residents would be forgiven for not engaging at the consultation stages as they may not see the relevance to them which supports our view that lines on maps (which can have a negative impact in local communities) are not appropriate in the NDF. Also the level of scrutiny and local engagement during the preparation of the NDF is not as rigorous as that of a SDP and LDP so again it would be inappropriate to define boundaries in this high level document.
- Welsh local authorities whose boundaries adjoin England are working closely with English local authorities on economic development and transport issues. The NDF needs to reflect the cross border issues, projects and cross border working arrangement together with any impact from different policy approaches across the border.
- We appreciate that the proposals for a National Infrastructure Commission are still in development but we are not clear how the NIC

Steve Thomas CBE
Chief Executive
Prif Weithredwr

Welsh Local Government
Association
Local Government House
Drake Walk
CARDIFF CF10 4LG
Tel: 029 2046 8600

Cymdeithas Llywodraeth
Leol Cymru
Tŷ Llywodraeth Leol
Rhodfa Drake
CAERDYDD CF10 4LG
Ffôn: 029 2046 8600

www.wlga.gov.uk

relates to the NDF. For example, if the NIC recommends a project which is not identified in the NDF as 'National Development' which takes precedence – the recommendations of the NIC or NDF which is a statutory development plan?

- It would aid understanding if the NDF could set out the relationship between other WG plans such as Marine Plan (when developed) and Wales Infrastructure Investment Plan.
- It is important that the NDF strikes a balance between planning for areas of growth and areas of need. The NDF needs to be relevant to all parts of Wales and should not disproportionately focus on areas of growth eg M4 corridor, NE Wales. Given the potential impact of Brexit on agriculture and rural Wales, it is critical that the NDF reinforces the role of rural Wales in the overall prosperity of Wales and enables sustainable and appropriate growth.

The WLGA looks forward to further input into the NDF during the stages of its preparation.

Yours faithfully



Councillor Andrew Morgan

WLGA Spokesperson for Environment, Sustainable Development and Waste