

Consultation Response Form

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<u>Organisation (if applicable)</u>	Representations submitted on behalf of: Tata Steel Europe Limited

1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with any of the 11 Outcomes, please tell us why:

Outcome 6 seeks to enable economic development, investment and innovation. Our client supports the NDF's recognition of the important role that economic growth needs to play in increasing prosperity levels across Wales.

Tata Steel Europe Limited (Tata Steel) employs approximately 6,000 people across Wales. They have major sites in Port Talbot, Shotton (Deeside) and Llanwern (Newport). In context, Port Talbot is the UK's largest steelworks. Each of the Tata Steel sites also bring wide ranging direct and indirect benefits to the local communities where they are located.

Tata Steel makes a significant contribution to the steel making industry of Wales, and at a UK wider level. It is vital that the NDF provides a framework which is supportive of economic growth and development, including longstanding industries such as steel.

The NDF needs to allow flexibility to provide for changing circumstances as businesses grow, develop and respond to changing market demands.

Whilst support is given to each of the 11 outcomes individually, the NDF does not recognise the inter-relationship between, and often competing nature of, the outcomes. The NDF is not clear that the outcomes are not criteria against which every plan making or development management decision should be made. This undermines the deliverability of the outcomes and that of the framework as a whole.

The Draft should be amended to explicitly recognise that sound plan and decision making will rely on an evidenced and balanced interpretation of the outcomes, taking into account local circumstances.

2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

Due to the changing nature of the industry and the historic nature of some sites, Tata Steel has areas of surplus land, which in many cases is brownfield in nature. This brings significant opportunities for future development, which the NDF should seek to facilitate and harness.

Currently, Policies, 1, 2 and 3 focus development on urban areas and those within existing town and city centres. Whilst this is supported in principle, as currently worded the NDF does not provide sufficient flexibility to respond to local needs and opportunities.

The NDF fails to recognise the opportunity that brownfield land in urban and less urban locations can provide in creating sustainable forms of development. Development in such locations can be well located in terms of proximity to job opportunities, have access to services and facilities and have high quality public transport links. Such sites also benefit from the availability of other infrastructure (e.g. electric/power supplies, water supplies, drainage, sewage and communications). Development on such sites can therefore provide highly sustainable development and contribute towards the NDF's stated outcomes.

The NDF should not therefore limit development to existing town and city centres at the expense of all other areas, where development can be appropriate and contribute positively to sustainable placemaking. It is for the Strategic Development Plan 's (SDP's) and Local Development Plans (LDP's) to consider whether developments and growth can be justified in alternative locations having regard to the objectively assessed evidence base, and having regard to local needs and demands.

The NDF must also recognise that development on the periphery of settlements can deliver sustainable development. In this regard, it should be acknowledged that it can be entirely appropriate, and necessary, for development to take place adjoining existing settlement edges and, importantly, on greenfield land. This is not sufficiently clear within the Draft NDF. Statements such as 'sprawling greenfield development' (p.22) are not helpful in this regard and should be deleted from the NDF. Greenfield development can be entirely appropriate and sustainable, coming forward alongside development on brownfield land within urban areas. Tata Steel itself has land adjoining a number of its operational sites that could be brought forward for development, in many cases alongside brownfield land.

The Draft NDF should be amended to provide for a flexible range of sustainable growth and development strategies to come forward across the national growth areas. This will allow for developments to come forward which better utilise brownfield land in delivering balanced growth in sustainable locations. The NDF must also enable Strategic and Local Development Plans sufficient flexibility to plan for development on appropriate greenfield land in order to accommodate future growth.

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

developments							
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better

connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

Tata Steel has sites across Wales and in each of the three identified regions. Our client welcomes the location of the three main Tata Steel sites at Port Talbot, Shotton and Llanwern within the identified National Growth Areas. Our client welcomes the acknowledgement that these locations are of strategic importance to the growth of Wales, and that the principle of growth within these areas is generally accepted.

The NDF should, however, give flexibility as to how and where growth is provided for within these growth areas. This should be determined as part of the SDP's and LDP's, and should be justified through the evidence base assessed and considered at that time.

Our specific comments on each region are outlined below.

South East Region

Our client supports the principle of Newport being one of the key focuses for regional growth and investment in the region (as per Policy 28). The NDF's recognition that Newport is an appropriate and sustainable location for significant housing and economic growth is supported.

Policy 28 states that the strategic emphasis should be on growth within the city of Newport. The NDF needs to allow greater flexibility for a range of sites to come forward within and near to the city, where these can be demonstrated to be sustainable and have high quality transport links. Such sites also often benefit from

access to other key infrastructure, including electricity/power, drainage, sewage, water and communications.

The supporting text to Policy 28 recognises the significant brownfield opportunities that exist around Newport, and these should provide a focus for development. Particularly when located close to high quality transport links (including the emerging Metro stations), the NDF should seek to maximise the use of brownfield sites to provide for the required housing and economic growth, whether located within the city or not. The use of brownfield land can result in the regeneration of underused sites and provide high quality development which respond to placemaking aims and objectives, bringing wide-ranging benefits to the local area.

Being a finite resource, there is a limit as to how much brownfield land is available for development. The NDF must recognise that appropriate greenfield sites will also need to come forward, particularly where well located to brownfield sites, and in accessible and sustainable locations.

Mid and South West Wales Region

Policy 23 identifies the Swansea Bay and Llanelli area, including Port Talbot, as the primary growth area for the region. Port Talbot, which provides Tata's largest steel works site within the UK, is identified as a Centre of National Growth.

Our client supports Policy 23, which recognises that the area is the main centre of employment, services and population and is well served with infrastructure and transport links. Growth within this area is therefore justified.

North Wales Region

Our client supports Policy 17, which confirms that Deeside, alongside Wrexham, will provide the focus for housing and economic growth within the North Wales Region.

Supporting text to Policy 17 identifies Deeside Industrial Park, where Tata's Shotton Steel Works are located, as an area where growth should be focussed. The recognition of the importance of Deeside, and particularly Deeside Industrial Park, as an area for economic growth is particularly welcomed by our client.

Support is also given to the NDF's acknowledgement that there is a need to focus on regional and inter-urban connectivity within the area. Our client supports proposed transport improvements such as Deeside Parkway, which will support economic growth opportunities within the area. Tata's Shotton works benefits from rail and road access which makes it well placed to provide for sustainable economic growth.

12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

No comments.

13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

No comments.

14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Comments.

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or 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, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Comments.

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

The NDF fails to recognise the potential of transferring freight by rail. Increasing the use of rail can reduce congestion levels on the road network and have a positive impact on reducing the impacts of climate change. The NDF provides the opportunity to increase the use of rail to transfer freight, by focussing economic development on sites which are accessible by rail.

16. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	<input type="checkbox"/>
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