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YOUR REF:

OUR REF: WHJ/SL/L.137

DATE: 14 November 2019

**By e-mail only to: [ndf@gov.wales](mailto:ndf@gov.wales)**

NDF Team  
Welsh Government

Dear Sirs,

RE: **National Development Framework**  
**Representations made on behalf of My Clients - Marcross Holdings Limited**

These representations express concern that the draft NDF, as it is currently worded, in respect of "New Towns" (or "New Settlements" as they are termed in PPW) is in conflict with, and as a result comes to the wrong conclusion, with the guidance which allows New Settlements to be considered as an option in both Planning Policy Wales and the Development Plans Manual Addition 3 (Consultation Draft June 2019).

There are situations where New Settlements would on any hierarchal approach to development be more sustainable development (especially where such development with a New Settlement is alongside existing public transport infrastructure – specifically the rail network – and close to employment areas) than expanding existing settlements.

The opportunity for employment in close proximity to new residential areas combined with immediately adjoining public transport infrastructure (rail links) to facilitate transport to larger settlements, especially where such sites involve significant elements of brown field development, provides opportunity for development on a sustainable basis. Far more sustainable in some circumstances than simply extending existing development (with all of the disadvantages that can sometimes result in).

My clients agree with the statement of the Vale of Glamorgan Council

*"the Council considers that the commentary on new settlements is too prescriptive in the NDF..... This would appear to rule out proposals for new settlements despite Planning Policy Wales (PPW) setting out the exceptional circumstances where they may be appropriate. In contrast the NDF should reflect the policy advice in PPW and recognize there may*

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*be a role for new settlements if they create more sustainable places than urban sprawl at the edge of existing settlements. Such matters should be given detailed consideration as part of SDP and LDP strategies"*

My clients wholly support the views of the Vale of Glamorgan Council, and express concern that the draft NDF, as it is currently worded is far too restrictive.

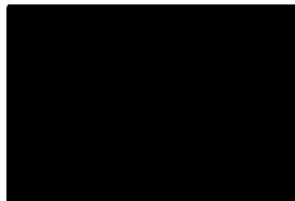
My clients fully support Policy 31 (Growth in Sustainable Transit Orientated Settlements) which states that:

*"Development and growth in the region should be focussed in places with good active travel and public transport connectivity. Land in close proximity to existing and committed new mainline railway and Metro stations should be the focus for development. Strategic and Local Development Plans should plan growth to maximise the potential opportunities arising from better regional connectivity. The Welsh Government supports the development of the South Wales Metro and will work with agencies to enable its delivery."*

The draft NDF should be revisited and re-worded to provide a much less restrictive approach to New Settlements, by permitting them to be considered as part of a hierarchal approach.

If you need any further information please let me know.

Yours faithfully,  
per pro **WATTS & MORGAN LLP**



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