

From: [Lucas_David](#)
To: [NDF](#)
Subject: CAERPHILLY COUNTY BOROUGH COUNCIL COMMENTS ON THE DRAFT NDF
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Attachments: [NDF_response.rtf](#)

Please find attached the comments of Caerphilly County Borough Council in respect of the Draft NDF

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Consultation Response Form

Your name	Dave Lucas
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Preferred contact details (email/phone/post)	
Organisation (if applicable)	Caerphilly County Borough Council

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 type="checkbox"/>	<input checked="" 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:

Introduction

It is interesting to note in the foreword that the Housing minister acknowledges that the market led housing system has failed to meet the needs of many people and wants to see higher levels of social rents on new developments. These comments are welcomed given the high levels of housing need in the borough and nationally. We need to see the detail of how this is going to be achieved as we know from the planning system that we often struggle to get the prerequisite amount of affordable housing on s106 negotiations because of site viability. So how do WG intend solve this issue?

We have to ask - can the stated objectives within the framework all be realistically achieved without additional resources being made available to deliver the individual priorities. So will WG be providing additional resources when the revised framework is implemented or make other changes to support the viability and deliverability of it's proposals

Outcomes

Generally the outcomes are expressed as high-level statements that in some cases set unrealistic levels of achievement. The Development Plan system is predicated upon an evidence base that demonstrates the viability and deliverability of its proposals. There is no such evidence to support these outcomes, and certainly no evidence to justify they are deliverable. Given this the NDF is setting outcomes that lower tier plans will need to be in general conformity with but have no evidence to demonstrate deliverability. This could lead to conflict in SDPs and LDPs that could seriously hamper development plan preparation and undermine the plan led system.

The NDF outcomes provide a conflicting set of objectives that cannot deliver sustainable development. As written the objectives seek economic development and increased affordable housing whilst reclaiming lost biodiversity and protecting greenfield land. The NDF is silent on how these conflicts are to be resolved and this will result in lower tier documents having to defend positions against the NDF. It will also make it impossible to make determination on general conformity for lower tier plans.

Outcome 5: This outcome seeks to facilitate the concept of focussing development on cities and large towns. This is in direct conflict with Policy 30 that REQUIRES a restrictive Greenbelt around Newport and

Cardiff, two of Wales' largest cities. The greenbelt could also seriously affect growth and development in Cwmbran, Caerphilly and the southern parts of RCT, restricting growth in areas where there is an NDF outcome to deliver growth.

In addition to this the decision not to progress the second M4 will mean that access to the South Wales cities and large towns will be severely hampered, with very significant economic costs and disbenefits, which could render aims of economic growth in the large cities and towns undeliverable. The NDF does not address this issue in any respect, despite its enormous impact upon the economic activity in Wales.

Outcome 6: Whilst the need is for the development plan system to be forward thinking with a positive attitude to economic growth, this should not be limited to just the development plan system. Well-being plans, the NDF, and infrastructure provider programmes should also be aligned to this aspiration, however, this is not the case.

Outcome 7: Travel is essential to the economic future of Wales, not only for people to access facilities and employment opportunities, but it is an essential factor for the economic future and prosperity of the whole of Wales. However the NDF is silent on the issue of the M4 and the continually increasing negative impact of the M4/Brynglas Tunnels is a primary reason why the economy of Wales is not competing better with the remainder of the country. In not addressing this national issue it raises significant questions regarding the robustness of the NDF.

In addition the Objective is ambiguous, containing two directions of travel, which are not complementary. Firstly the co-location of development to reduce the need to travel. The second to enable easy and convenient access from one place to another for commuting. Such ambiguity makes policy planning at lower levels difficult as policies cannot deliver both objectives at the same time. This ambiguity needs to be clarified and rectified.

Outcome 10: Strongly object to the statement "we will reverse these losses". The question is how this is to be done? Some losses are as a result of development and to reverse these the developments would need to be removed and the land reinstated. This is both unrealistic and undeliverable, which is borne out by the lack of any detail on how this could be achieved.

In addition to this the Well-being Act and now the NDF are presenting an environmental protection of everything first policy, which runs counter to the need for economic growth and significant increases in housing provision, particularly affordable housing. Whilst the protection of the environment is an accepted principle of sustainable development, these documents as written are making greenfield development, which is essential to meet housing and economic development aspirations, almost impossible to plan for. To ensure that the economic and social elements of sustainable development are provided in plans, it is essential that the need to balance all four sustainability factors is fundamental to delivering sustainable development, rather than delivering environmental objectives which can never deliver WG aspirations.

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	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>				X	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	X	<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:

The Council has significant and fundamental objections regarding the spatial strategy, or indeed the lack of it, proposed for the NDF. The NDF makes no reference to: addressing the M4 congestion and the consequential adverse impact on the economy of Wales; nor any reference on national scale renewable energy generation (including tidal lagoons). These are major omissions of two significant issues of national importance. The NDF is proposing economic growth whilst remaining completely silent on the M4 which carries the majority of its freight and workforce, whilst there is no overall land use strategy for delivering renewable energy that will be required in increasingly greater levels due to increased electric based travel.

In addition the spatial strategy focuses on Cardiff in SE Wales, at the expense of the Valleys, whilst seemingly hindering Cardiff's ability to cater for increasing development demands by the requirement to designate a greenbelt around Cardiff and Newport to the M4 crossings.

Fundamentally disagree with the statement "Choosing to develop new towns and enabling sprawling greenfield development would be to ignore the untapped potential of places which already have town centres, universities and colleges, public transport infrastructure and a good range of public services". What is meant by sprawling greenfield development? Controlled expansion of existing towns into the countryside **is inevitable** if we are to concentrate development to existing towns and cities because there is insufficient land available in such centres to accommodate welsh government's aspiration for growth. It is unrealistic to expect all new development to be brownfield, although it is accepted that where brownfield sites are suitable and viable they should be first choice, and **the NDF should include a clear statement to this effect!**

Policy 1: It is only correct that development should primarily be focussed towards existing settlements, especially where they benefit from transport networks that support sustainable travel. However, it is quite feasible that the most sustainable form of development could be a new settlement outside existing settlements rather than increasing development on settlements where infrastructure and quality of life are already challenged. This policy does not allow this form of development and as such could perpetuate less sustainable development.

This policy will also have the effect of targeting land close to town centres (which is likely to be the interpretation of the public) which can only result in town cramming and increased pressure and loss of essential urban open space, as well as significant further strains on already stretched infrastructure, which the public already raise as significant issues in response to any development.

The policy should acknowledge that development on the periphery of settlements can also deliver sustainable development, especially where there are current transport routes or the possibility of new routes being opened up. The acknowledgement that development will need to take place on the edges of settlements and on greenfield land will ensure that the most sustainable options for accommodating growth can be pursued.

Policy 2 & 3: Town and city centres are already the mostly densely developed parts of our settlements. The potential to find significant sites to accommodate developments such as hospitals is highly questionable. Where sites do exist these are liable to be constrained by fluvial flooding issues as most centres are located on river corridors, which would preclude such developments. Again this policy could be forcing such developments into areas that are much less sustainable than alternatives located in other areas. The principle should be to deliver sustainable development that represents the best compromise between the four factors of sustainability, rather than slavishly dictating where such developments should only be located.

There are also significant objections to the policy relating solely to public sector developments and land. There is no reason why private hospital development should not be subject to the same restrictions that public service ones are, similarly in all aspects of this policy, it seems to be a policy to restrict the potential of public bodies to deliver infrastructure where it is most appropriately located, which unfairly restricts public bodies.

The sequential test should apply to all such development, irrespective of who delivers it.

The major issue, however, with these policies is that they have taken no account of the requirements for Sustainable drainage and SAB requirements. Ensuing developments comply with sustainable drainage will require land and will significantly reduce densities as a result. The answer cannot be to increase densities of development because the SAB requirement will increase as well. Consequently the policies are undeliverable in their current form and the NDF must address the issue of sustainable drainage if these policies can ever be really implemented.

We have the following concerns about the design of the spatial strategy map:

- It is too cluttered and therefore difficult to understand.
- Few places have been labelled, causing difficulties for users who are not familiar with the geography of Wales.
- There are a number of regional growth areas identified, but these areas are not labelled. Furthermore, the symbol for the regional areas is untidy and detracts from the map.
- National growth areas are shown in three different colours, but it is not clear from the map why this is the case.
- The symbol for the strategic port is unclear.
- It is unclear which places the intra-urban connectivity relate to.

The focus of the NDF is very much on housing growth. It does not deal with existing housing stock and the regeneration role. Obviously in the Valleys there is a high level of owner occupation but where the household income is very low.

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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

The Policy states that SDPs and LDPs should set development plan targets based on regional estimates of housing need and local assessments. Regional estimates of housing need by tenure have recently been published by Welsh Government, which indicate that in South East Wales there is an annual need for affordable housing units ranging between 2,000 and 2,500. Using the central estimate, this equates to 48% of housing in the first 5 years. The Wales figure overall is that 47% of additional homes should be affordable.

The statistical release for the Estimates of Housing Need provides caveats that they are estimates based on a given set of assumptions, aimed at forming a basis for policy decisions. The estimates of need **"should not be used as housing targets"** and therefore Policy 5 should be reworded to state that regional Estimates of Housing Need should form part of the evidence base for affordable housing targets, rather than basing SDP targets entirely upon these estimates. Unless this is clarified there is a concern that the target of 47% should be affordable might dictate that similar targets are included within the SDP/LDP. This is not desirable nor appropriate.

Affordable housing targets in LDPs are based not only on need but also on deliverability/viability. In most cases 47% is not viable or deliverable or indeed desirable in most instances.

The supporting text for the policy correctly recognises that the private sector has been unable to meet the affordable housing shortfall, and that LAs, RSLs and SMEs will have a role in delivering more homes. LAs and RSLs should continue to have access to Welsh Government funding to help deliver affordable housing, and this funding should be increased to maximise delivery.

However, SMEs, as private sector companies, will only be able to deliver affordable housing through Section 106 agreements, as they do not currently have access to WG grant funding for affordable housing. SMEs do have an important role in increasing the supply of housing in Wales, particularly in low viability areas such as the Valleys, where there has been limited activity by national housebuilders in recent years. Viability is an issue in such areas and therefore the contribution that SMEs can make to affordable housing delivery may be limited in certain parts of Wales, unless Welsh Government intends to support SME delivery financially

It is implied that the re-use of publicly owned land could be used for the delivery of affordable homes. On 8th July, the Minister wrote to Local Authorities to indicate that LDPs must make provision for affordable housing led housing sites and that such sites will include at least 50% affordable housing. The letter states “in the first instance affordable housing led housing sites should make use of public land.”

It is welcomed that the NDF does not explicitly reflect the content of the Ministers letter in that public land should be providing at least 50% affordable housing. Publicly owned land is an asset for Local Authorities and the prescription of a certain level of affordable housing above LDP policy levels will have a significant impact on the capital receipt to Local Authorities, particularly in areas of low viability such as the South Wales Valleys. It should be a matter for Local Authorities to determine what the priorities are for their own land, as in some areas, the need for market housing to diversify the housing stock and retain the existing population may better achieve the aims of delivering sustainable communities. It is welcomed that the supporting text recognises that “different responses will be needed in different parts of Wales to meet the needs of local communities.”

The NDF talks about public investment and land. There are examples where public sector land has been used for housing purposes. Clearly more needs to be done to encourage public sector bodies to bring its land forward for housing purposes. We also need to explore ways to encourage such bodies to bring their land forward for less than best value to ensure we are able to maximise the level of affordable housing provided. However, we know that budget constraints usually prevent organisations doing this

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"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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

4. 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"/>	X	<input 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?

Whilst the aim of increasing electric vehicle usage through provision of relevant infrastructure will have a positive impact on climate change, the corollary of the aim is that the number of vehicles will be retained which will have little, if any, effect on congestion and the massive economic disbenefits and costs this brings. Consequently this is a dual edged sword and can cause as many issues as it resolves. It is accepted that driverless cars and the Uber-style provision of public transport by car will reduce car levels (if ownership drops correspondingly) but this is unlikely to occur in the near future and, as such, the issues of congestion and restraints this places upon the economy will remain.

5. 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"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	

Whilst the recognition of the important role Green Infrastructure plays is welcome, the section itself is bordering on being naïve. It is almost impossible to deliver development without some adverse impact upon biodiversity, irrespective of what approaches are used in their design or implementation. The policy would be better aimed at seeking enhancement wherever possible whilst acknowledging that development will need to take place on greenfield sites, although these will avoid areas important for green infrastructure.

6. 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	Don't know	No opinion
Large scale wind and solar developments					X	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks				X		<input type="checkbox"/>	<input 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?

Significant objections are raised in respect of the NDFs policy in respect of renewable energy generation by solar and wind generation. The identification of Priority Areas (identified at national level) means there is essentially almost permitted development for large scale generation proposals, and thus a presumed acceptance of potentially catastrophic landscape change as part of the policy. The designation of these areas pays no regard to smaller areas of high quality landscape and the proposed process means that all that needs to be demonstrated is that adverse impact has been minimised (which could still be a very high level of impact).

It seems completely unreasonable that National Parks have been omitted from the Priority Areas, given they generate need for energy as well as the other areas included within them. The rational and methodologies used to identify National Parks are now significantly outdated and these areas contain some of the best sites for renewable energy generation. The proposals bring far more areas of Caerphilly into energy field than was previously the case and indeed does not target those areas where we consider generation acceptable. This would result in significant landscape impact and is strongly opposed.

The proposals also seem to rule out the aspirations for the HoV corridor for the creation of an

energy belt as part of its economic development aspirations.

Further to this proposed generation schemes outside of the Priority Areas utilise exactly the same criteria that developments within the Priority Areas need to address. This seems at odds to the principle of the presumption in favour within Priority Areas, as both schemes are considered against the same criteria.

The NDF only addresses Large Scale developments, which means that local authorities remain the arbiters of small scale developments. Given that Priority Areas may not be identified in LDPs (as there is no requirement for them to do so) small scale schemes may be considered far more stringently than large scale developments, which is wholly inappropriate.

Whilst the encouragement for district heating networks proposals is welcomed, there is concern over the impacts such a requirement may have on developments. There are concerns that 100 dwelling developments may not be able withstand the costs of providing such networks. Even more concern regarding the statement that smaller developments could also realise district heating networks.

There is a complete lack of consideration of both tidal and off shore generation, both of which could make significant contributions in terms of energy generation, whilst having less landscape impact than large scale onshore developments.

7. 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>
X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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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.

8. 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"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

9. 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"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

10. 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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.

Policy 29: Whilst the sentiment of the policy is generally agreed, the dualling of A465 has created excellent access to the Head of Valleys, providing a link between two existing industry Hubs (Port Talbot Waterfront and Ebbw Vale Tech Valleys). In order to boost the regional economy and attract external investments as well as local and international talents, the NDF should advocate that full advantage of the existing infrastructure should be taken.

The NDF should target new employment and tourism opportunities to the A465 corridor in an effort to transform the image and culture of the Heads of Valleys. The NDF should also recognise and promote the HoV aspirations for the creation of an innovation and energy corridor.

The NDF states "Under the Welsh Government central estimates 71,200 additional homes are needed in the region until 2038 and over the initial five years (2018/19 to 2022/23) 48% of the additional homes needed should be affordable homes."

Firstly, the inclusion of housing estimate figures under a policy on the Heads of the Valleys causes confusion in respect of whether they relate to the Heads of the Valleys area/authorities only, or whether they relate to the South East Wales Region as a whole. It needs to be more explicit that these figures relate to the whole region.

The estimates of additional homes have been derived from the Estimates of Housing Need in Wales by Tenure (2018-based). The statistical release for the Estimates of Housing Need provides caveats that they are estimates based on a given set of assumptions, aimed at forming a basis for policy decisions. It is clear that the figures in the statistical release "**should not be used as housing targets**," yet there is a real danger that the inclusion of a single figure in the NDF without a full explanation of what this figure is will result in the figure being treated as a target.

There is some recognition that these estimates provide part of the evidence base and context on which the SDP should be based, but this should go further to state explicitly that this figure is not a housing target, but is informed by household projections that are based on past trends.

Policy 30: the Council has never supported a greenbelt as other policies can more than satisfactorily protect the area identified in the NDF for greenbelt. Greenbelts are permanent designations and as such will sterilise the land within the designation. This could severely restrict development within the two cities in the region, both of which have been identified for national growth, and in some of the main towns identified for regional growth, such as Cwmbran and Caerphilly. The designation of the greenbelt could result in the growth aspirations for this region not being realised due to the restrictions on development around the M4 or the mainline railway, or at least not realised in the locations stated in the NDF.

Policy 31: Caerphilly is identified as a Centre for Regional Growth (See map on page 63). The controlled expansion of Caerphilly Town into the countryside is inevitable if we are to concentrate development in this location. It is unrealistic to expect all new development to be brownfield, although it is accepted that where brownfield sites are suitable and viable they should be first choice.

The policy identifies Caerphilly as a centre for regional growth and this is based on its identification as a Strategic Hub by the Cardiff Capital Region and the Valleys Task Force. However it should be noted that the Strategic Hub identified in the VTF work is Caerphilly and Ystrad Mynach. The NDF should refer to both towns as centres for regional growth in accordance with the VTF.

Policy 33: The policy is welcomed although the NDF could give the Valleys Regional Park greater priority and supporting text.

The policy text contains the heading “Rivers and Valleys” and the text relates to minerals activity which bear not relation to the subject of the policy. This should be omitted from this policy.

11. 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.

12. 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?

13. 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?

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.

14. 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?

General

The numbering of paragraphs would make it easier for users of the document to make reference to relevant sections.

There are a number of places within the document where two policies have been included at the top of a page, and the supporting text for more than one policy has been included below it. Whilst the policy that each paragraph refers to has been referenced, the separation of the policy from the supporting text affects the flow of the document and we would suggest it is reordered so that the policy wording and supporting text are together, in order to improve clarity.

Alternative Proposals

The NDF should set out the framework of policy that the lower tiers of plans can build upon and provide increasing detail. The NDF needs to take a lead on significant issues, setting out the national approach to addressing the issues that have national significance. However, the NDF is lacking in a number of areas in this respect. However the NDF as drafted does not make reference to a number of significant elements that require a national lead in order for lower tier plans to provide the detail as follows:

- M4 (Brynglas Tunnels) and the costs to the Welsh economy. The recent decision by the Welsh Government to not progress the Second M4 means that the existing issues with the Brynglas Tunnels remain. The congestion and closures that occur because of the tunnels has a massive cost and impact on the economy of Wales as a whole, and will continue to be detrimental to economic growth. The lack of acknowledgement or consideration of road being the mode for freight in Wales, along with the support for electric vehicles means this problem will remain for a significant period into the future, compromising Wales' ambition to deliver significant economic growth.
- A465 Heads of the Valleys Road. No reference is made to the contribution that this significant artery into Wales can have in delivering national and regional development. The

Valleys Taskforce has set out aspiration and proposals for the Heads of the Valleys area and key to delivering these is maximising the benefits of the investment that has been made by Welsh Government on this national artery. It is surprising that the NDF does not include specific policies on maximising the benefits of the improvements within this area.

- There is no mention of freight in the NDF. Freight is a significant contributor to climate change and the impacts of heavy goods vehicles on the road structure requires significant funding to maintain the damage done by lorries. The electrification of the railways provide the opportunity to set out ambitious modal shift targets for freight from road to rail, particularly where the freight is going to the ports or elsewhere on the mainline rail network. Freight is also a major contributor to the problems at Brynglas Tunnels and delays to freight movements as a result of this issue are one of the main costs to the Welsh economy.
- There is little in the NDF that relates to improving linkages between north and south Wales, an important issue given that movement between them is problematic unless routes outside Wales are used.
- In terms of renewable energy generation no mention is made of offshore wind generation or the potential for Tidal Lagoons to generate significant levels of renewable energy. Both of these options have the potential to cause less damage in terms of landscape and ecological impact, whilst generating significant levels of renewable energy. The NDF purely concentrates on onshore wind and solar generation and district heating networks at the expense of a holistic policy approach to delivering renewable energy.
- In addition to the significant omissions outlined above, the NDF provides no policy framework for a number of landuses, including retailing, recreation and leisure, minerals, tourism, and general infrastructure. Whilst it is acknowledged that there are a number of documents that sets out national strategies for some of these issues, the purpose of the NDF is to give a spatial context to issues of national importance to provide the spatial framework for the policy framework at lower tiers. Without this spatial context these issues remain open to interpretation at lower levels and may not end up delivering national objectives.

Overall the significant omissions from the NDF and the failure of the NDF to provide a spatial strategy for development in Wales undermines its credibility and raises significant concerns over whether the document is fit for its purpose. In particular the omission of the consideration of the M4 issues and the potential for off-shore wind and tidal lagoon energy generation mean that significant issues of national importance have no policy position, which can only undermine the plan led system.

15. 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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