

**From:** [Robinson, Victoria L](#)  
**To:** [NDE](#)  
**Cc:** [REDACTED]  
**Subject:** NDF Response - Vale of Glamorgan Council  
**Date:** 06 November 2019 17:00:17  
**Attachments:** [VOG Response to WG - draft-national-development-framework-consultation-document.docx](#)

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Please find attached the response of the Vale of Glamorgan Council.

Regards,

Victoria Robinson

Operational Manager for Planning and Building Control / Rheolydd Gweithredol - Rheoli Datblygu  
Regeneration and Planning / Adfywio a Chynllunio  
Vale of Glamorgan Council / Cyngor Bro Morgannwg

[REDACTED]

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**Consultation Response Form**

Your name	Victoria Robinson
Your address	Dock Office, Subway Road, Barry CF63 4RT
Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	<u>Vale of Glamorgan Council</u>

## 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	Don't know	No opinion
		X				

- 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	Don't know	No opinion
	X				

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

The Council disagrees with the wording of Outcome 5 - *A Wales where people live and work in towns and cities which are a focus and springboard for sustainable growth.*

Not everyone in Wales can (or want to) live and work in towns and cities. We recognise that the NDF seeks to focus growth in sustainable places and concentrate development in towns and cities but this is not deliverable or desirable for the whole of Wales or for all the people of Wales, many of whom live and work sustainably outside towns and cities. Such an outcome is therefore grossly over-simplistic.

The Council is not clear about the meaning of Outcome 11 - *A Wales where people live in places which are decarbonised.*

The Council welcomes a shift towards the low-carbon economy however the word 'decarbonised' suggests that Wales can be carbon free which does not appear to be a realistic outcome to achieve by 2040. The NDF needs to be realistic as well as ambitious if it is going to be a meaningful plan.

The 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 is not helped by the lack of sufficient evidential analysis or information, the type of analysis that is required when producing other plans such as Local Development Plans.

A further comment is that the 'Outcomes' would be more clearly expressed as 'Aims'.

## 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)			X				
Rural areas (Policy 4)		X					

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

The spatial strategy identifies the Vale of Glamorgan as part of the South East Wales region, recognising it sits within a "National Growth Area", which is supported given our location and commitment to the Cardiff Capital Region City Deal.

We would note there is an inconsistency with the way the "National Growth Area" is illustrated on the all-Wales spatial strategy plan (pg 25) compared to the area depicted on the South East Wales regional plan (pg 63). The former suggests the growth area covers most of the Vale of Glamorgan as far as the Glamorgan Heritage Coast, which is what we would expect and endorse. Whereas, the latter regional plan suggests only half of the Vale of Glamorgan (roughly north of A48 strategic highway) is within the National Growth Area, which excludes Cardiff Airport and the St. Athan and Cardiff Airport Enterprise Zone. Whilst we note these are only illustrative / indicative plans, it is confusing and could lead to misinterpretation as the latter is clearly inaccurate and the plan on pg 63 should be amended to reflect the one on pg 25.

Policies 1, 2 and 3 seek to concentrate growth within towns and cities, highlighting that large-scale public service facilities (such as universities and colleges, hospitals and public sector organisation buildings) should be located in town and city centres. Whilst this is welcomed in principle, it is unclear whether the NDF has been informed by any urban capacity studies to determine whether there are suitable sites available for such facilities within town/city centres across Wales. Furthermore, development of such facilities within town and city centres should not be at the exclusion of other suitable sites.

It would be more appropriate to direct large-scale public service facilities to locations that are easily accessible by a range of modes of sustainable transport and close to where users live or work, or where other complementary uses are nearby. Policy 2 as worded is currently too restrictive and would preclude very suitable sites not in town/city centres. In planning terms, town/city centres usually have tightly defined boundaries within LDPs and relate to the 'retail core' area. If the NDF definition assumes a wider boundary to 'town/city centres' then this should be explained within it. By way of illustration, the Council is currently working with joint venture with Welsh Government, to dispose of land at the Innovation Quarter in Barry Waterfront for a college campus. This site is not within the 'town centre' but is within easy walking distance of homes, rail and bus services, leisure

uses, offices, shops and other services which make the site extremely sustainable. The policy should be clearer that sites like this will also be appropriate for these types of public service facilities.

Focussing development within existing urban settlements often results in town cramming and increased pressure and loss of open space, as well as significant further pressure on infrastructure like transport, schools, medical facilities etc. which is already a major concern for our communities. The planning system should deliver sustainable development in locations that represent the best compromise between the competing sustainability objectives and this is what the NDF should be stating rather than dictating where such developments should only be located.

Policy 3 emphasises the importance of publicly owned land in delivering development including for mixed use and affordable housing. Whilst this is welcomed in principle, it is considered that there is not a significant amount of Council owned land available in the Vale of Glamorgan for development, particularly in town centre locations. The Council is already identifying available land to deliver its Affordable Housing agenda, including building Council housing for our communities in areas of highest need. However, the Council also uses receipts from land disposal to deliver other strategic objectives such as the 21<sup>st</sup> Century schools programme. Welsh Government need to support Council's financially to deliver this agenda if land receipts are going to be reduced to support other policy initiatives.

Policy 4 supports 'appropriate proportionate growth in rural towns and villages' but recognises this is best planned at regional and local levels. This is welcomed and should be based on evidence prepared at LDP level.

The Council would also question the evidence and assumptions that have informed the NDF and whether the focus on existing town/city centres and urban areas is realistic and deliverable in the absence of urban capacity studies to support it. The number of vacant / available sites (particularly brownfield sites) within existing settlements in the Vale of Glamorgan is limited. Many of these sites have been developed in recent years for housing and they are a finite resource. An over-reliance on growth within existing settlements could stifle growth within the "National Growth Areas" and undermine the delivery of the NDF and its outcomes.

The Council considers that the commentary on new settlements is too prescriptive in the NDF where it states: *"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. It would also squander key assets in the form of productive countryside and natural resources"* (page 22 refers). 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 recognise their may 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.

### **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.

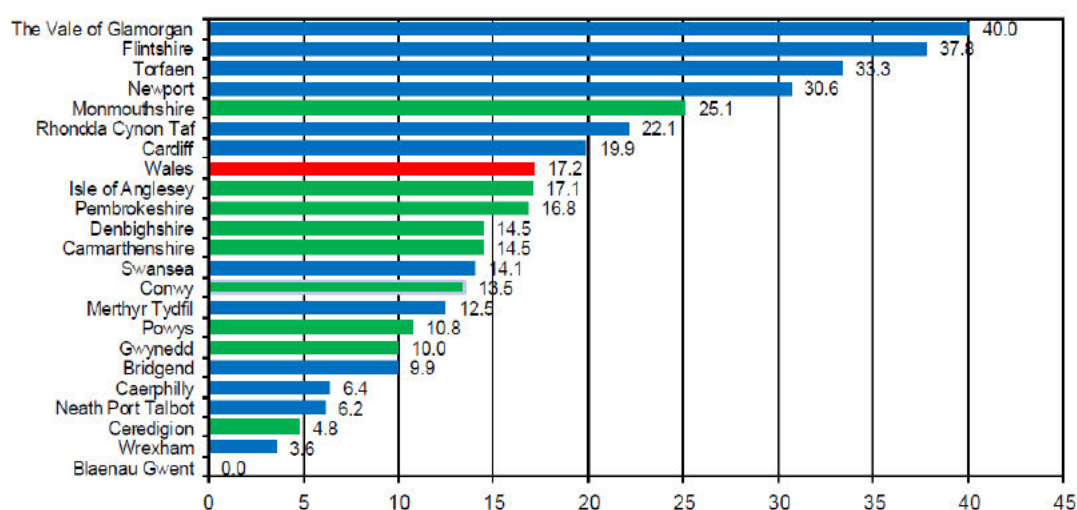
- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
		X				

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

The Council is supportive of all initiatives aimed at increasing the supply of Affordable Housing. In the Vale of Glamorgan, our annual need for affordable housing identified in our Local Housing Market Assessment is 576 a year and demand significantly exceeds supply despite the Council being a leader in this field (see table below).

**Chart 2 - Rate of all additional affordable housing units delivered per 10,000 households, by local authority area, 2017-18**



Source: Affordable Housing Provision data collection, Welsh Government, and mid-2016 Household Estimates, Welsh Government

In recent years the Vale of Glamorgan has delivered around 30% affordable housing across all sites each year and, based on our LDP build rate of circa 630 dwellings per annum, this equates to delivering around 190 affordable homes per year which is still less than a third of the identified need set out in our latest Local Housing Market Assessment.

It is clear that more needs to be done to increase the supply of Affordable Housing, and the Council is responding to this challenge with its own ambitious programme of Council house building. However, there are concerns that across Wales the identified need for affordable housing is not close to being met.

Whilst Affordable Housing supply through public sector, RSL, Council housing and support for SME builders is a laudable ambition, the NDF appears to be somewhat dismissive of the role the private sector, in particular volume house-builders, have in delivering Affordable Housing, which has been significant in the last 20 years. In the Vale of Glamorgan the private sector has been responsible for delivering 661 affordable homes through section 106 agreements on market-led developments in the last 5 years.

The role of the private sector in delivering Affordable Housing will be largely influenced by market forces such as development viability, land/build costs, developer risk and return on investment which varies across Wales. In this regard, it is still important to allocate land in locations where developers want to build and where development viability is strong enough to support a strong policy requirement for increased levels of Affordable Housing and other necessary infrastructure. In parts of the Vale of Glamorgan, we have been successfully securing 40% Affordable Housing on private sector sites, e.g. Taylor Wimpey's site for 475 homes at Cowbridge is delivering 190 affordable homes, of which 133 are social rented tenure, in addition to significant infrastructure including a new link road and primary school.

There is a danger that Welsh Government's policies on housing will push volume house-builders out of Wales, as their representatives have suggested in various forums, and this would undermine our ability to meet housing need across a range and mix of house types and at the scale necessary to meet the NDF outcomes.

The NDF must have the same rigorous approach to deliverability as that required of Local Planning Authorities when preparing their Strategic and Local Development Plans, which must be in conformity with the NDF.

#### 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	Don't know	No opinion
	x					

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

The Vale of Glamorgan benefits from good mobile coverage compared to other parts of Wales.

The identification of mobile action zones is welcomed and will assist in the development and enhancement of telecommunications infrastructure across Wales. It is also welcoming that the NDF recognises the importance of the landscape and the inclusion of landscape protection within the policy. Local Planning Authorities have designated Special Landscape Areas and have prepared Supplementary Planning Guidance on design and



landscape protection and these should form the basis of any assessment of significant adverse landscape impacts.

Resources to enhance the telecommunications network should support other elements of the NDF i.e. targeting growth areas and employment sites to ensure that they can attract and facilitate business. This is inherent in the mobile action zones as they stand in that they consider the presence of commercial properties within their 100m grid squares, but they also need to consider the implications of employment allocations and the aspirations of the NDF for growth. While the overall objective should be that all of Wales should benefit from network coverage, intervention should be targeted to support the economy and communities most in need.

Further while the telecommunications networks in many areas are capable of facilitating the necessary social and economic demands that are placed upon them, advances in technology could render some areas substandard in future and regular assessments of the mobile action zones should be undertaken to ensure that resources continue to be appropriately targeted at those areas in most need of improvement.

Policy 6 Mobile Action Zones should also take in account the impact of new infrastructure on the historic built environment and aviation safety where applicable.

## 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	Don't know	No opinion
		X				

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

The policy needs to be supported by the appropriate regime e.g. Building Regulations / Highways Act.

## 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	Don't know	No opinion
	X					



## 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	Don't know	No opinion
Large scale wind and solar developments		X					
District heat networks			X				

- 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?

### District Heat Networks:

Policy 14 places a duty on LPAs to identify opportunities for District Heat Networks (DHNs) and ensure they are integrated in new and existing development, with Policy 15 requiring master planning for DHNs through major development proposals. The map on page 42 of the NDF identifies 'Barry' as one opportunity area for a DHN. The supporting text should make reference to the potential to also include them on strategic employment sites.

The NDF promotes the use of using renewable energy and district heat networks to power and heat places. This approach is supported as it will be necessary to help achieve the Welsh Government's aim of meeting the target of net zero carbon emissions. However, the Council questions whether the policies contained within the draft NDF in relation to delivering DHNs in Wales is an appropriate mechanism to achieve this aim. Although the thrust of the strategy is supported the policies within the draft NDF are not considered robust enough, in isolation, to direct the change required in the development process to achieve the targets for reducing carbon emissions in Wales.

Barry has been identified as the area which had the highest potential to bring forward DHN schemes with the most benefit to the highest number of users. However, detailed feasibility studies and commercial strategies are required to evidence the deliverability of a specific site for DHN. The draft NDF is not clear as to how local authorities should identify opportunity areas for DHN within the identified Priority Areas, it is considered there would be insufficient capacity and / or capability within local planning authorities to effectively undertake this work which adds to the burden and complexity of LDP preparation. It is considered an approach which spreads responsibility between both local planning authorities and developers would improve the deliverability of the policy.

The draft NDF does not explain how identified areas for DHN schemes will be integrated within new and existing developments. This approach cannot be effectively secured using

current policy mechanisms. In relation to new developments it is considered likely that developers would be unwilling to implement DHN schemes due to the impact upon viability issues relating to development sites which could affect the majority of development proposals. Additionally, a significant hurdle to financial viability in delivering DHN schemes for domestic use is consumer uptake. Energy Services Providers are likely to have a minimum dwelling uptake to be able to consider taking on a DHN scheme, which in some cases will require as many as 500 dwellings to consider a CHP scheme economically viable. In existing development, it can be a very expensive process to retrofit large DHN schemes within an area. It is considered, that the draft NDF should reference community heating schemes when relating to existing uses. Community heating supplies heat to a relatively small developments of one or perhaps two buildings with multiple dwellings, such as a multi storey block or sheltered housing complex. The technologies required to implement this although not inexpensive are considered to be more deliverable than large scale infrastructure, particularly where there is currently little funding to implement this within the public sector or significant funding accessible to developers.

Policy 15 requires large-scale mixed-use developments to have DHNs where it is considered feasible. Although this is a positive approach in principle, it is considered with other viability issues surrounding the development of sites, DHN schemes would only be feasible for developers in the minority of cases and is likely to be dismissed as unfeasible in practice. However, it is considered to foster real change the Welsh Government should seek to implement legislation and building regulations which require new build developments to incorporate DHN schemes. This would give certainty to developers when factoring in development cost from the outset.

Therefore, Welsh Government should introduce a framework through regulations to provide safe, secure and competitive heating network markets to facilitate the required growth in DHN domestic heat supply to meet the 2050 carbon target.

In conclusion, we support the aim of increasing the uptake of DHN schemes within Wales, however the current policy approach does not offer clarity on how local planning authorities or developers will deliver upon the aims of the policies. There needs to be further work undertaken surrounding the current legislative and regulatory framework surrounding DHN schemes for it to be effective. Furthermore, the current wording of the policies places more onus on local planning authorities to deliver DHN schemes while developers have more flexibility. A more balanced approach which relies on both LPAs and developers would be more appropriate and would reduce costs for local planning authorities when preparing plans.

We would also draw your attention to the interesting work on micro-hydro schemes <http://www.thegreenvalleys.org/> and community renewables <https://www.awelamantawe.org.uk> and <http://awel.coop/> in Wales which perhaps needs to be mentioned.

### **Off-shore renewable energy:**

The NDF does not consider of tidal or 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.

### **National Forest:**

Policy 9 sets out WG's commitment to developing a 'National Forest' but does not explain how Welsh Government will identify delivery sites and mechanisms to achieve this aim. The Vale of Glamorgan Council is supportive of this initiative but seeks more information



from Welsh Government on how it will increase woodland cover in Wales by 2000 hectares/annum from 2020 (i.e. next year).

The Vale of Glamorgan Council would welcome consideration being given to the role of a green belt, including areas of woodland to form part of the 'National Forest' on the western edge of Cardiff (i.e. the eastern part of the Vale of Glamorgan), where the landscape and topography would lend itself to this use and would provide a 'green lung' to the city of Cardiff. Further comments on green-belt are provided in response to Question 11. Such proposals should be planned for the long-term to protect our environmental assets now and for future generations in accordance with the WBFG Act.

## 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	Don't know	No opinion
X						

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.

Policy 16 Strategic Policies for Regional Planning refers to 'gypsy and traveller need'. It needs to be clear that the SDP will be looking specifically at transit sites and that permanent sites will be identified in LDPs and based on evidence of local need.

## 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	Don't know	No opinion
						X

## 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	Don't know	No opinion
						X

## 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	Don't know	No opinion
			X			

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.

The Vale of Glamorgan Council has already signed up to the principle of an SDP for the Cardiff Capital Region on 29<sup>th</sup> July 2019 (Minute 215 refers) and as Responsible Authority hopes to submit a proposal for an SDP in South East Wales to Welsh Government in due course.

### **Implications of the proposed policies and approach for the South East Region for the Vale of Glamorgan:**

In terms of the NDF's approach to the South East Wales region, the Vale of Glamorgan Council is disappointed that its role in the region has been largely ignored. The focus on Cardiff, Newport and the Valleys has (whether intentionally or not) left important areas like the Vale of Glamorgan outside its consideration despite Barry being one of the largest towns and centres for economic growth and regeneration in the region. The standalone reference to the airport, without any reference to the role of Barry is unfortunate and

regrettable and fails to recognise the important role that the town plays in the local and regional economy.

The regional summary on page 61 states “Major population centres are in the Valleys and two cities” and this ignores the 130,000 residents of the Vale of Glamorgan and our largest town of Barry where approximately 52,000 people reside. In short, the statement “Major population centres are in the Valleys and two cities” is erroneous and grossly misleading and should be corrected.

The Vale of Glamorgan as a whole has delivered 15% of the region’s housing in the last 5 years including 30% affordable housing, and its role should not be ignored.

The Vale is home to major centres for economic development in the form of the Cardiff Airport and St. Athan Enterprise Zones in addition to its existing successful business and industrial sites which already provide significant numbers of jobs in sustainable locations.

The Vale of Glamorgan Local Development Plan – which runs to 2026 (the first quarter of the NDF timeframe) recognises that the key settlement of Barry will continue to be an important hub for social and economic activity and is recognised in the LDP Strategy as one of the most sustainable locations within which to focus major new development opportunities. The comprehensive redevelopment of Barry Waterfront, including 1700 homes, retail and leisure uses, will assist in the regeneration of the town and encourage economic growth. Accordingly, the LDP Strategy promotes a significant amount of new housing, employment and retail development in Barry. Irrespective of the future potential for growth in Barry after the LDP end-date of 2026, the town clearly plays an important role in the region as an existing large town which provides significant employment, housing, leisure and tourism opportunities for the region. This should be recognised in the NDF more than it is at present.

It may not be appropriate to identify Barry as a ‘Centre for National or Regional Growth’ in the NDF but the NDF should recognise settlements like Barry for their role as important existing centres meeting the needs of existing and future residents in the area. It is unclear what the ‘box’ used to identify Barry on the map at page 63 means as it is not in the key.

In order to ensure the continued prosperity of the area and promote growth in the capital region, 492 hectares of land is allocated in the Vale of Glamorgan LDP (2011-2016) to meet regional and local employment needs. Recognising the role the Vale of Glamorgan has to play in the future economic prosperity of the Capital Region, the LDP allocates three major employment sites at St. Athan Aerospace Business Park, Cardiff Airport, and at Junction 34 of M4 (Hensol) as the catalyst for new employment within the South East Wales region. Development of the allocated employment land is estimated to generate a potential 10,610 jobs. The Vale’s potential in this regard is not recognised in the NDF.

To facilitate the St. Athan and Cardiff Airport Enterprise Zone, the Vale of Glamorgan LDP allocates 77.4Ha of land surrounding Cardiff airport, which is intended to focus on business and employment uses catering specifically for the needs of the aerospace industry and high tech manufacturing. The NDF recognises the role of Cardiff Airport at Policy 32, however it focuses on it in isolation without recognising the wider area of the Vale of Glamorgan and its role in supporting growth in the region.

The Council would therefore request that the NDF be amended to recognise the important role that the Vale of Glamorgan plays in this region as set out above.

The text at page 64 ignores the pressures that Cardiff places on the Vale of Glamorgan to its west: *“Cardiff is currently experiencing a period of growth in population and employment, but the city cannot continue to expand indefinitely without major consequences for the environment. It is a compact city nearing its physical limits, which include Caerphilly and Garth mountains to the north and the Bristol Channel to the south. Cardiff must generate and support regional growth throughout the south east while enhancing its status as a vibrant capital city of Wales.”*

The Vale of Glamorgan, directly to the west of Cardiff faces extreme pressure for growth in response to demands from Cardiff given their close proximity and strong transport connections. However, this has resulted in significant environmental effects in the eastern part of the Vale of Glamorgan in particular, where transport infrastructure is struggling to cope with the demands. This should be recognised in the NDF and dealt with through the SDP / LDP process to follow. Further comments below relating to the green belt issue are also relevant to this issue.

Finally, as noted above on the Spatial Strategy question, we would note there is an inconsistency with the way the “National Growth Area” is illustrated on the all-Wales spatial strategy plan (pg 25) compared to the area depicted on the South East Wales regional plan (pg 63). The former suggests the growth area covers most of the Vale of Glamorgan as far as the Glamorgan Heritage Coast, which is what we would expect and endorse. Whereas, the latter regional plan suggests only half of the Vale of Glamorgan (roughly north of A48 strategic highway) is within the National Growth Area, which excludes Cardiff Airport and the St. Athan and Cardiff Airport Enterprise Zone. Whilst we note these are only illustrative / indicative plans, it is confusing and could lead to misinterpretation as the latter is clearly inaccurate and the plan on pg 63 should be amended to reflect the one on pg 25.

#### **Wider comments on the South East Region Proposals and Policies:**

The Council would question the emphasis on Newport and the Valleys and delivery on brownfield sites. It is unclear what evidence has informed this strategy in terms of urban capacity studies and development viability appraisals. We question how deliverable this strategy is, and whether local planning authorities will be able to prepare SDPs and LDPs that conform with the NDF whilst demonstrating deliverability through their independent Examination.

In terms of the illustrative map at page 63, the symbolic ‘M’ for South Wales Metro is rather confusing – it would be better if more detail was shown on the map in relation to the Metro, particularly when the text refers to the major strategic opportunity to it provides to improve rail, bus, cycling and walking infrastructure across the region and provide a focus for investment, regeneration and associated development. This is a spatial plan and such proposals should be shown spatially.

Intra-urban connectivity should also be shown as moving between east and west in the South East Wales region between Cardiff and Newport and not just from the Valleys heading southwards.

#### **Green Belt issues:**

One of the most prescriptive policies in the Draft NDF is Policy 30 (Green Belts in South East Wales). While the Policy itself requires the identification of green belts through a Strategic Development Plan to manage urban form and growth in South East Wales, it refers particularly to Newport and the eastern region, ignoring pressures from Cardiff in the north and west. The supporting text goes further to state: *“The Strategic Development*



*Plan must identify a green belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff*” and the illustrative diagram on page 63 shows a clear indication of the location of that green belt. This is considered to be too prescriptive, particularly given the apparent absence of detailed evidence and analysis to support this requirement. If it were proposed as part of an SDP or LDP in this way it would not meet the tests of soundness without robust evidence to support it – it is not reasonable that the NDF has a lower bar for evidence required to support it when it is being so prescriptive.

It is noted that the policy approach to Green Belts between North Wales and South East Wales is inconsistent (i.e. – in North Wales Policy 19 ‘supports’ the role of SDPs identifying and establishing Green Belts to manage urban form; In SE Wales Policy 30 ‘requires’ the identification of Green Belts through a SDP to manage urban form and growth in SE Wales. It is requested that the South East Wales policy wording be amended to reflect that used for North Wales, as there appears to be no justification or explanation for a different approach.

The green belt policy would appear to be overly restrictive in the eastern part of the region (i.e. Monmouthshire) where sustainable growth should be welcomed to manage social issues such as population decline and to address inequalities in terms of access to affordable housing for younger people. Furthermore, this part of the region needs to respond to the effects of migration resulting from the impact of the removal of the Severn Bridge tolls particularly the economic opportunities associated with this – there is a significant opportunity for Monmouthshire to capitalise on economic links to the South West region and it’s strategic location between the Great Western Cities of Cardiff, Newport and Bristol, and to address the social sustainability of the County’s demography. Greenbelts are permanent designations and as such will sterilise the land within the designation. Restricting growth in this part of the region in such a prescriptive way through the NDF undermines the Cardiff Capital Region City Deal which includes a growth strategy for the whole region and would act to hinder growth in an area of significant demand and potential. It also undermines the role of the SDP and pre-determines the growth strategy to follow which needs to be supported by robust evidence. It is noted that there is a different policy approach to links to the English regions between North Wales and South East Wales i.e. North Wales – wider cross-border links to Cheshire/Liverpool City Region are recognised and encouraged (Policy 17). There is no similar reference in Policy 28. Why are the important cross-border links recognised in the North but not in the South East?

Furthermore, there may be other parts of the region where a green belt is justified, such as to the west or north of Cardiff. We would note that a green belt was proposed by Cardiff in their Deposit Draft LDP which extended across the whole of the north of Cardiff to the area around J33 of the M4. The green belt proposals in the deposit LDP were amended to a green wedge by the Inspector following the LDP examination. The inspector cited reasons of prematurity for the designation of a green belt and, given the permanence of a green belt designation, the potential that this would have to prejudice any conclusions reached through the pending regional planning processes. At that time, Welsh Government also raised concerns with the designation of a green belt to the north of Cardiff and raised a category B objection to the Deposit LDP, stating a Green Belt designation is premature and could prejudice any conclusions arrived at through a more strategic approach. The prescriptive Policy 30 in the Draft NDF would appear to contradict Welsh Government’s previous consideration of this issue.

In respect of the Vale of Glamorgan, continued development pressure in Cardiff raises issues going forward as Cardiff has only limited capacity for expansion in terms of available developable land. Similarly the absence of the Green Belt between Cardiff and Newport as designated in the adopted Newport LDP could be a cause for concern given

the obvious continued pressure on Cardiff and the identification of Newport as a regional growth centre in the NDF.

While the draft NDF does not outwardly dismiss the designation of a green belt elsewhere in the region, the exclusion of such a designation in the NDF when a green belt to the north of the M4 from the Severn Crossings to North Cardiff is explicitly required in the NDF, could predetermine any future consideration on this matter at a regional or local level.

## **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 comment.

## **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 comment.

## **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 comment.

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.

## **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 Council's would question the evidence and assumptions that have informed the NDF and whether the focus on existing town/city centres and urban areas is realistic and deliverable in the absence of urban capacity studies to support it. An over-reliance on growth within existing settlements could stifle growth within the "National Growth Areas" and undermine the delivery of the NDF and its outcomes.

It is unrealistic to expect all new development to be brownfield, where brownfield sites are suitable and viable they should be prioritised but the NDF implies greenfield development should be severely restricted. This strategy is unlikely to deliver the sustainable development needed to meet the needs of the future generations of Wales.

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 the NDF outcomes or to demonstrate they are deliverable. The NDF is setting outcomes that SDPs and LDPs will need to conform to and prove through examination that they are deliverable, based on robust evidence. This could lead to conflict in SDPs and LDPs that could seriously hamper development plan preparation and undermine the plan led system.

The Council is not convinced that the NDF Outcomes can be realistically achieved without additional resources being made available to deliver the individual priorities. Will Welsh Government be providing additional resources to LPAs who are tasked with implementing the NDF through SDPs and LDPs.

The NDF makes no reference to addressing the M4 congestion and the consequential adverse impact on the economy of Wales. The NDF is proposing economic growth whilst remaining completely silent on the M4 which carries the majority of its freight and workforce. This is a significant omission for a spatial Development Plan for Wales for the next 20 years.

The NDF needs to clarify the role of the ferry (strategic) ports and ports in Wales. They are shown on the spatial strategy diagram and regional plans but there is no policy or explanation as to their current and future roles.

The national parks are also shown on the spatial strategy diagram but not on the regional plans. This inconsistency needs addressing and the NDF should acknowledge that they present valuable sustainable tourism and leisure opportunities which significantly benefit the local rural economy. Consideration should be given to a new policy on the national parks.



On housing, 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.

The NDF is largely silent on the importance of developing digital infrastructure across Wales. Superfast Broadband or copper to fibre infrastructure is now yesterday’s technology and the need to ensure that full fibre to premises is achieved across Wales to improve its attractiveness as a place for modern business is essential . This needs to be at the forefront of the aims and objections of the NDF and is largely missing without detail about how it can be secured.

It is surprising that the NDF is silent on monitoring and does not include a monitoring framework in the same way as LDPs. Having recently undertaken the first Annual Monitoring report for the Vale of Glamorgan LDP, the Council recognises the value in checking the Development Plan is meeting its objectives and would welcome the Welsh Government leading by example in this regard in its own Development Plan.

In summary, the NDF is a missed opportunity.

## 16. Are you...?

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

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