

From: [Claire Miles](#)
To: [NDE](#)
Subject: Growing Mid Wales Response - NDF Consultation
Date: 15 November 2019 21:14:22
Attachments: [image001.png](#)
[image002.png](#)
[2019 11 NDF GMW response final.doc](#)

Noswaith dda

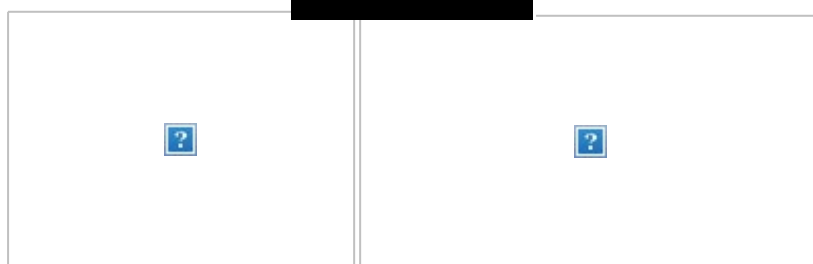
Please find attached the Growing Mid Wales Partnership response to the WG's current consultation regarding the proposed NDF.

I would be most grateful if you could confirm safe receipt.

Kind Regards

Claire Miles

Claire Miles
Swyddog Ymgysylltu Rhanbarthol Canolbarth Cymru/ Mid Wales Regional
Engagement Officer



Gwasanaethau
Datblygu
Economaid a
Chymunedol
Cyngor Sir
Ceredigion
Penmorfa
Aberaeron
SA46 0PA

Economic and
Community
Development
Services
Ceredigion County
Council
Penmorfa
Aberaeron
SA46 0PA

Adfywio ac Eiddo
Corfforaethol
Cyngor Sir Powys
Neuadd y Sir
Spa Road East,
Llandrindod Wells,
LD1 5LG

Regeneration and
Corporate Property
Powys County
Council
County Hall,
Llandrindod Wells,
LD1 5LG

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Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg. Cewch ateb Cymraeg i bob gohebiaeth Gymraeg ac ateb Saesneg i bob gohebiaeth Saesneg. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

Ymwadiad:

Er y cymerir pob gofal posib i sicrhau cywirdeb unrhyw wybodaeth a chynghor a roddir yn yr ohebiaeth hon, ni dderbynnir atebolrwydd am unrhyw golledion a all godi o unrhyw gamgymeriadau sy'n gwynysedig ac fe'ch atgoffir o'r angen i chi ofyn am gynghor proffesiynol eich hun.

Bwriedir y neges ebost hon, ac unrhyw atodiadau iddi, at sylw'r person(au) y'i danfonwyd atynt yn unig. Os nad chi yw'r derbynnydd y cyfeiriwyd y neges hon ato ef neu hi, neu'r person sydd gyfrifol am drosglwyddo'r neges hon iddo ef neu hi, mi ddylech hysbysu'r anfonwr ar eich union. Oni bai mai chi yw'r person neu gynrychiolydd y person y cyfeiriwyd y neges hon at ef neu hi nid ydych wedi eich awdurdodi i, ac ni ddylech chi, ddarllen, copio, dosbarthu, defnyddio na chadw'r neges hon nac unrhyw gyfran ohoni.

O dan y Ddeddf Amddiffyn Data 1998 a Deddf Rhyddid Gwybodaeth 2000 gellir datgelu cynnwys y neges ebost hon.

We welcome correspondence in Welsh and English. Correspondence received in Welsh will be answered in Welsh and correspondence in English will be answered in English. Corresponding in Welsh will not involve any delay.

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Growing Mid Wales Partnership

[The following response was considered and approved by the Growing Mid Wales Partnership at its meeting on 18th October 2019, noting changes agreed by correspondence following the meeting.]

The Partnership received a request on behalf of the Welsh Association of National Park Authorities to reserve their position on this response, noting that a separate response had been sent on behalf of the three National Park Authorities in Wales. It was also considered appropriate to reserve the position of Welsh Government members of the Partnership Board.

It should be noted that this response has not been presented using the consultation response form as this was not considered particularly helpful.]

Your name	Cath Ranson
Your address	Neuadd Cyngor y Sir, Stryd y Farchnad, Aberaeron, Ceredigion SA46 0AT
Preferred contact details (email/phone/post)	email to ldp@ceredigion.gov.uk & [REDACTED]
Organisation (if applicable)	<u>The Growing Mid Wales Partnership</u>

1. 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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The Growing Mid Wales Partnership is committed to developing a stronger, better interconnected economy for Mid Wales through public / private sector collaboration. It is committed to bringing forward a Growth Deal that will achieve significant improvement in economic prospects through a different concept of rurality and long term transformational change.

The Growing Mid Wales Partnership welcomes the progress made to replace the Wales Spatial Plan with a statutory National Development Plan.

However the GMW Partnership:

- Disagrees fundamentally with the NDF's proposed division of Wales into three regions, not four;
- Expresses concerns at paucity of consideration given to Mid Wales outside the industrial south of the Mid and West Wales region and at the lack of consideration for cross border policy implications for mid Wales and the English Midlands;
- Expresses disappointment at missed opportunities to deliver a national framework that would provide the national policy support needed for the economic growth of mid Wales, recognising the need for investment and the strategic opportunities that this plan should be identifying;
- Seeks recognition within the NDF's regional section of the significant differences in characteristics and development opportunities between Mid Wales and South West Wales;

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The case has been made previously for Mid Wales to be recognised as a discrete region with distinct characteristics that are very different to those of South West Wales; Tying the future of Mid Wales into the economic ambition of the Swansea City Deal would confound the emergence of an independent voice for a very different and transformational economic agenda founded on the emerging Mid Wales Growth Deal and on the qualities of Mid Wales. Recognition is needed of the strategic planning issues across mid Wales, as being very distinct and different to those pertaining to south west Wales, the M4 corridor and in particular to a potential SDP for the Swansea City region, likely to encompass Neath Port Talbot, Swansea, Carmarthenshire and possibly Pembrokeshire.

Mid Wales needs an agile and flexible planning policy framework that embraces / enables some of the economic and technological opportunities rather than a too rigid stance that looks to focus development in areas where traditionally there has been growth. With a time span to 2040 the NDF needs imagination, flare and flexibility in identifying the opportunities of the future, for some of which the locations of past and current enterprise may not be the right locations, to be open to new technologies not yet thought of, technologies of the future and particularly those associated with de-carbonisation, for which locations to harness all forms of renewable energy / natural resources will be important.

A very different model of rurality is needed for deep rural areas to maintain vibrant communities and to promote the Welsh language.

The declared policy of concentrating growth on Aberystwyth / Llandrindod Wells / Newtown is flawed in that it ignores the importance of the market towns in the region. Distances are too large between the three centres to just concentrate growth there and the Partnership's Regeneration Strategy recognises this in pushing for revitalised market towns.

- Questions the extent of alignment of the NDF with the economic and transport Action Plans;
- Notes the need for recognition that there are several significant opportunities to sustain mid Wales and the plan needs to enable these, in order to deliver but not go into detail about where all development ought to take place. Future growth may be more opportunistic and be based around clear air (radio spectrum technology), around emerging renewable technologies and associated technological innovation, including hydrogen fuel cells and hydrogen powered vehicles, around the coastline (tourism and harbour development) and around land (agri food / food development and manufacturing). These sectors may well be the transformational ones as far

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as mid Wales goes and are not typical in terms of everything being focused on a major town.

At present there are concerns that the NDF, as drafted, will frustrate or prevent opportunities;

The Partnership regrets significant missed opportunities:

- To embed spatial analytics into the Plan:

A wealth of information in the background evidence has not been translated into emerging spatial policy within the NDF Consultation Draft. There is a lack of detail in drawing on spatial evidence to better understand how the NDF could inform and encourage improved economic, environmental and social outcomes. More nuanced spatial analysis and interpretation is needed of infrastructure, physical and digital, improved connectivity to grid identifying strengths and the need to improve transport connectivity.

As currently written, and without policies appropriate to supporting appropriate economic growth in rural heartlands, the draft NDF, in seeking to direct rapid growth to the three identified strategic growth areas of Wales, fails to focus on the likely consequences of such growth on those areas outwith the strategic growth areas, and, in so doing, may result in intensifying rather than ameliorating existing spatial inequalities, for example in terms of depopulation / increasingly skewed demographics, economic opportunities, health and educational opportunities. This is not addressed within the draft NDF, but if continued through to the published NDF without effective rural policy provision, is likely to exacerbate existing regional inequalities and result in significant depopulation, and exacerbating population imbalance driven by loss of working age populations.

- To provide a clear steer on Welsh Government's ambitions for growing the Welsh language: Improved leadership and direction is needed on spatial analysis, necessary to support consistency in approach for proposals to meet Government's commitments to protecting and growing the Welsh language through planning.
- To provide stronger leadership on infrastructure provision including:

A broad definition of Infrastructure and clear interrelationships between the NDF and the Infrastructure (Wales) Bill and commitment, through the Bill, to resolution of grid connectivity issues and funding / provision for local grid networks;

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More detailed consideration of the opportunities for significant innovative developments requiring co-location of renewable energy, water supply and infrastructure – grid connectivity and developing technologies such as hydrogen / battery storage;

Strong proposals to improve the resilience to increased storminess of physical infrastructure: with road, rail and power connections increasingly susceptible to disruption;

- Greater consideration is needed of the opportunities for active / green / cultural tourism, occasioned by the richness of the landscape, cultural heritage and marine fauna in Cardigan Bay, noting initiatives to improve marine tourism facilities at key locations around the Irish Sea in Wales and Ireland, to build on the designations of the Coastal Way along the length of Cardigan Bay and the Inland Cambrian Way, the Wales Coast Path and to develop an international centre of excellence for Archaeology.
- A stronger focus is needed on the interrelationship between the Wales National Marine Plan and the NDF, to provide leadership on the potential requirements for landfall associated with maritime economic activity.
- Absence / Insufficiency of evidence base, a lack of consistency in relating policy to evidence base and an absence of narrative that some evidence may be subject to significant change prior to submission of the NDF (including report of consultation / recommendations for change) to NAFW for scrutiny:

Housing Need Assessments: Clarification is needed within the NDF that the need figure (regional) should not be a target but a starting point for strategic and local development plans. The approach needs to align with the emerging Development Plans Manual, otherwise confusion may ensue causing difficulties at LDP Examinations. Clarification is also needed of the likely change in these targets as a result of anticipated (November 2019) release of updated population and household forecasting;

- Current lack of detail / evidence on the reach and purpose of the **National Forest** and on **Mobile Action Zones** is such as to require separate additional consideration / dialogue prior to publication of designations in the NDF.
- **Planning Policy Wales 10 / TAN 8:**

Insufficient clarity on associated proposals on renewable energy, and the suggested need to revise PPW 10 and remove TAN 8 (including Strategic Search Areas) alongside publication of the adopted NDF: this information should be within the consultation documents for the NDF and not just provided through oral presentations.

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For the decarbonisation agenda to succeed and prevail significant amounts of additional renewable electricity flowing around Wales and the UK are necessary, with much of this reliant on new technology. Without this none of the other policies are realistic. Power is everything, and in the future that power means renewable electricity.

The proposed priority renewable energy generation areas are inadequate, insufficiently evidenced to define their true extent and ignore the current TAN 8 strategic search area in the Cambrian Mountains - where there is plenty of water and few people. This SSA designation must be retained to enable potential projects to come to fruition. Similarly, planning policy has to make life much easier for improving grid infrastructure - which currently prevents new significant renewable energy generation in Mid Wales.

Procedural

Recognition is needed of the strategic planning issues across mid Wales, as being very distinct and different to those pertaining to south west Wales, the M4 corridor and in particular to a potential SDP for the Swansea City region, likely to encompass Neath Port Talbot, Swansea, Carmarthenshire and, possibly, parts of Pembrokeshire.

Notwithstanding objections to the scale /scope of the proposed region, the Partnership welcomes recognition by WG (section 5, the regions) that for Mid and West Wales full regional coverage is not necessarily the answer to SDP preparation and that regional planning may well be addressed by a combination of a SDP and one or more joint LDPs.

Ceredigion and Powys Local Planning Authorities have been committed to collaboration in the establishment of evidence, as appropriate, for Development Plan preparation, either across the area of Mid and South West Wales, or in smaller collaborations with one or more other local planning authorities, whilst retaining individual authority progress on LDP preparation.

It is considered that Strategic Planning issues across Mid Wales would be best addressed by collaborative work between Ceredigion and Powys Local Planning Authorities and, where joint plan making is considered appropriate, that preference for progressing this would be through a joint Local Development Plan embracing strategic and local policies, rather than through establishing a Strategic Planning Panel to prepare a Strategic Development Plan with local preparation of LDP 'Lites'.

In conclusion, the Partnership requests an opportunity to present to the NAFW Climate Change, Environment and Rural Affairs Committee in its scrutiny of the NDF, to outline the opportunities for transformational developments in Mid Wales, compatible with the area's rurality, advancement of technology in carbon reduction, potential for colocation of renewables with off grid technologies, its academic strengths with potential for research, innovations and skills development and commitment to growing the economy to provide better quality choices for residents and to emphasise the Partnership's concerns with the NDF Consultation Draft.