

From: stfaganscc@btinternet.com
To: [NDE](#)
Subject: National Development Framework Consultation
Date: 15 November 2019 12:39:23
Attachments: [SFCC - NDF Response - 15th November 2019.docx](#)

Dear Sirs

Please find attached response to the NDF consultation from St Fagans Communiuty Council.

Please confirm receipt.

Yours faithfully

Andy Gowman
Clerk to St Fagans Community Council



Clerk to St Fagans Community Council



St. Fagans Community Council



15th November 2019

NDF Team
Planning Policy Branch
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Dear Sirs

National Development Framework Consultation

Please see below the Council's views on the NDF.

St Fagans Community Council is a member of the North West Cardiff Group (NWCG) and supports the comments made by the Group.

As said by NWCG the outcomes are insufficient for a Development Plan. The issue is not so much agree or disagree with outcomes as whether they and the policies in the dNDF can deliver the WG objectives.

The dNDF 'provides direction.....does not seek to identify the exact location where developments should take place, the scale of growth....or precise boundaries'. We understand that it is difficult to be completely prescriptive, and that things can change over 20 years, but clear spatial boundaries (Metro, Green belt, growth areas for employment and housing) are required. Without this it is not clear what will happen and local and regional authorities will be able to take decisions without certainty on what is required and that may be contrary to the required outcomes.. For example, if the NDF does not prescribe 'precise boundaries' how will 'sprawling greenfield development be prevented?

What is meant "by involving communities" (Page 11)? Too often involving local communities means nothing more than shallow presentations telling people what has already been decided and what is going to happen. Meaningful engagement and community involvement in decision making is a key requirement of the Aarhus Convention and enshrined in EU law. Eventually of course, decisions have to be taken, but people need to feel that they are genuinely involved in decisions that affect them. If not they feel neglected and ignored. 'Consultation' is after a tick box exercise. This is not in the spirit of the Convention.

We agree that Wales has great potential with renewable energy technologies but use needs to be done with care so as not to damage the environment and biodiversity. Wales has an abundance of streams and waterfalls and the potential for generating energy should be explored; the focus should not just be on large scale projects.

Tourism is a major economic benefit to Wales. The landscape is a major attraction for visitors, making it important that landscape sensitive areas are protected when renewable energy projects are planned.

Section 4. We agree with comments made by NWCG about " sprawling greenfield development". How will this be prevented in the future if 'precise boundaries' are not established at the outset.

We fully support the aims of sustainable development and renewable energy, but this will not be achieved by loosely drafted 'outcomes'. We argued at Cardiff LDP hearings for all new homes to have

a solar panel fitted. This was rejected, but would certainly help to reduce energy demands and to make affordable housing really affordable. All new homes must be built to energy efficient standards.

P24 Spatial Strategy makes reference to channeling development away from the countryside and productive agricultural land. As things stand it may be more profitable for landowners to choose development over agriculture. This is what is happening in NW Cardiff, where the landowner had 'managed down' the land so that it was less productive as agricultural land. Cardiff Council effectively supported this by approving large greenfield developments. This is contrary to the NDF but how will it be prevented in the future?

Policy 1 Sustainable Urban Growth we can support the sentiments expressed in this section. What is missing is the commitment to put essential infrastructure in place at an early stage, not after the event. We reference Cardiff because that is where we have greatest experience. In a city that already has congestion and poor air quality new developments are taking place without adequate transport infrastructure improvements being in place before occupation. There are inadequate/no bus services in place so residents are using cars. Cardiff claimed to need a 50:50 modal split for their LDP to succeed but do not require developers of large strategic sites to deliver a 50:50 split - the result is more congestion and poorer air quality. What is happening is precisely what Policy 3 seeks to avoid - increased car trips from areas poorly served by public transport – and it is happening on the very edge of the capital city!

We fully support the 'metro', a Rapid Transit System is essential not just for NW Cardiff but for the wider area. Until it is in place roads such as the A4119 from RCT to Cardiff will only become more congested.

Page 30 quotes the number of new homes required in Wales over the next 20 years as 114,000. We doubt that this is achievable. A significant step change in delivery rates is required to even come close to this target.

We believe that mechanisms need to be in place to adjust housing targets (up or down) if circumstances change.

Policy 5. Delivering Affordable Homes. We recognise the need for affordable housing and agree that provision should become a 'key focus for housing delivery'. We question whether local authorities are capable of, and sufficiently willing, to apply this when dealing with landowners who prefer to build higher value houses for open market sale. Developers must not be allowed to reduce the percentage of affordable homes in a development by negotiation with local planners. Policy 24 (Regional Centres for Mid and South West Wales Region) estimates that 44% of new housing for the region will need to be affordable, while on average 47% of homes should be affordable for Wales. (P30). This is significantly more than the current 10% requirement of developers. For this to be achieved strong local leadership and central support will be essential.

It is vital that affordable housing is not sold off to 'buy to rent' landlords who profit from the need for affordable housing, invariably to the detriment of the wider community. We draw attention to the Goldsmith Street, Norwich, development of 105 energy efficient affordable/Council homes that was recently awarded the RIBA Stirling Prize 2019 for best new building. As stated above we asked at the Cardiff LDP hearings for all new homes to be fitted with a solar panel (or panels) to at least meet the properties heating and hot water needs.

Policy 6 Mobile Action Zones. Most people have experienced problems with mobile phone coverage when others with a different service provider have excellent coverage. Operators should be required to work together,, including mast sharing, to deliver an improved service.

Policy 7 Changing Technology. We support the drive away from petrol and diesel to ultra-low emission vehicles. The percentage of such vehicles on the road is still small - according to Department of Transport statistics just 2% of newly registered vehicles in Q2 2019 were ultra-low emission. This makes it essential that rapid transit infrastructure is put in place to encourage people away from cars. Planning for charging points etc. needs to take account of the potential changes in technology – future ultra-low emission vehicles may not all require electric charging facilities.

Policy 8 Biodiversity Enhancement. We question whether this is an issue that can be left to local authorities. Policies must be legally enforceable to ensure compliance. We do not challenge the statement that 'Safeguarding does not prohibit development...' but it is important that the demand for development is not allowed to override other issues. It is currently too easy for developers and local authorities to sacrifice green spaces and biodiversity because it is more convenient to develop Greenfield sites on the edge of towns and cities, so that we lose green spaces and 'sprawling urban development'. It is our contention that when hedgerows are removed they should be replaced by hedgerows of at least the same size, and preferably larger; when a tree is cut down two new trees should be planted in its place.'

Policy 9 National Forest. We support this intention to develop a national forest. We hope that priority will be given to native species.

Policy 10-13 Renewable Energy. We fully support the targets in this area. While large scale projects are essential we believe that smaller initiatives have a significant role to play; for example all new builds should have a solar panel for heating and hot water; solar panels on public buildings such as schools to meet the energy needs. These initiatives can help to eradicate or at least reduce fuel poverty.

Policy 14-15 District Heat Networks. We believe this needs to be stronger. For example, specified developments (100 dwellings mixed use etc.) should not be required merely to consider a District Heat Network, but should be required to implement a network unless they can clearly demonstrate that a network is not practical or possible. Clear criteria must be established for this. A target should be set for DHNs.

The Regions. The key is 'effective regional collaboration' and the challenge is how to achieve this. Authorities have a responsibility at the local level but must accept that their responsibility goes further. This requires a change in thinking, attitudes and actions. One area must not be allowed to dominate. While some areas may be the main areas for growth (such as Swansea, Wrexham and Cardiff in their respective areas) the local authorities must not be allowed to disregard the needs or views of neighbouring authorities.

While these areas may be the focus for growth we suggest that investment cannot be focused solely on these main areas if some stated policy objectives are to be achieved. For example a strong rural Wales; investment will be required if rural communities are to be able to 'sustain themselves and grow' (Policy 24).

In connection with this we share the concerns of NWCG about the failure of the dNDF to give protection to family owned or tenanted farms. As stated by NWCG these smaller farms are essential for "food security, protection of language and cultural identity."

South East Region. We welcome the statement that growth will be focused on Cardiff, Newport and the Valleys. Many Valleys communities have suffered over many years and it is important that they, like rural communities are able to 'sustain and grow themselves'. The number of people commuting to Cardiff for work is a major contributor to traffic congestion and air pollution. The whole region will benefit from more jobs in the Valleys. While Cardiff may be the 'primary settlement' in the region but as stated in Policy 27 it 'cannot continue to expand indefinitely without major consequences to the environment'. We believe these consequences are already happening with Cardiff experiencing 'sprawling greenfield development' and loss of adjacent green open spaces and agricultural land.

Policy 30 Green Belt. We support the comments made by NWCG that the Green Belt needs to extend around NW Cardiff and West Cardiff so that 'sprawling greenfield development' from Cardiff does not encroach on rural areas.

Policy 31 We fully support the concept of 'Transit Oriented Development' but the infrastructure required to support this must be in place before development. Cardiff is currently adding to the problems it claims to be trying to solve by allowing development and occupation of new housing before a bus service (or safe cycle and walking routes) are in place. The solution to South East Wales congestion and air quality problems rests with a rapid transit system. Bus lanes may have a role to play, but as

developers own travel plans have revealed they will do no more than reduce journeys by seconds; that will not be enough to persuade people to give up their cars.

Policy 32 Cardiff Airport. While we appreciate that accessibility is important we do not believe that is the most significant issue with Cardiff airport. It is not clear what is meant by 'Passenger services'. We believe the most important issue is routes. So many people travel from South Wales to Bristol Airport that the airport runs special bus services. The draw is not accessibility - anyone who has ever been to Bristol airport knows that it is not an easy journey. The attraction of Bristol is that it offers the routes that people want to fly at a price that is affordable. The challenge for Cardiff is to add more affordable routes to its offering. People will not decide to spend more on a flight to somewhere they don't want to go just because there is a good road to the airport.

We are disappointed that the dNDF makes no mention of north – south transport links. We fully understand the importance of links to other parts of the UK and beyond. We also understand that funds are limited and priorities need to be established. We are not asking for extra tarmac but improved public transport should be considered.

Please acknowledge receipt of these observations.

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