

**From:** [Nicola J Evans](#)  
**To:** [REDACTED]  
**Subject:** Consultation Draft National Development Framework 2020-40  
**Date:** 15 November 2019 14:09:08  
**Attachments:** [image001.jpg](#)  
[Final Copy 15.11.19.pdf](#)  
[draft-NDF-response-form.doc](#)

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Please find attached response from Carmarthenshire County Council. The letter is intended for the personal attention of the Minister.

Regards

Nicola

**Nicola Evans**

**Rheolwr Cymorth Busnes / Business Support Manager**

Adran y Prif Weithredwr / Chief Executive's Department

E-Mail: [REDACTED]  
[REDACTED]  
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Eich cyf / Your ref:

Gofynner am / Please ask for:

Wendy Walters

Fy nghyf / My ref:

Llinell Uniongyrchol / Direct Line:

Dyddiad / Date: 15 Tachwedd 2019

E-bost / E-mail:

[Prifweithredwr@sirgar.gov.uk](mailto:Prifweithredwr@sirgar.gov.uk)

**Ms. Julie James AC**  
Y Gweinidog Tai a Llywodraeth Leol  
Llywodraeth Cymru  
Sed Llawr  
Tŷ Hywel  
Bae Caerdydd  
CF99 1NA.

**Annwyl Weinidog,**

**Ynghylch: Drafft Ymgynghori Fframwaith Datblygu Cenedlaethol 2020-2040**

Ysgrifennaf atoch yn dilyn yr ymgynghoriad mewn perthynas â Drafft y Fframwaith Datblygu Cenedlaethol (FfDC), a hoffwn ddiolch i chi am y cyfle i gymryd rhan a rhoi barn y cynghorau mewn perthynas â'i gynnwys.

Rwyf wedi atodi ymateb llawn gan ddefnyddio'r ffurflen ymgynghori a ddarparwyd, a ystyriwyd gan y Cyngor ar 13 Tachwedd 2018. Fodd bynnag, hoffwn bwysleisio eto ymrwymiad yr awdurdod i gydweithio â chi a swyddogion i sicrhau system Cynllunio Datblygu sy'n darparu ar gyfer Cymru gyfan a'i chymunedau.

Mewn perthynas â chynnwys Drafft y FfDC, mae nifer o bwyntiau wedi'u nodi yn yr ymateb amgaeedig na fyddaf yn eu hailadrodd yn y llythyr hwn.

Fodd bynnag, dylid nodi'n benodol absenoldeb cymharol manylion mewn perthynas â rôl a gwerth ein hardaloedd a'n cymunedau gwledig a'u cyfraniad ar raddfa facro-economaidd ond hefyd fel cyfrannwr ar lefel Cymru gyfan. Efallai eich bod yn gwybod bod Grŵp Gorchwyl Materion Gwledig Trawsbleidiol yn Sir Gaerfyrddin wedi bod yn ystyried ffurf ein hardaloedd gwledig yn y dyfodol, a'i fod wedi cyhoeddi ei adroddiad yn ddiweddar, sef Symud Sir Gâr Wledig Ymlaen (Mehefin 2019): Adroddiad ac Argymhellion Grŵp Gorchwyl Materion Gwledig Sir Gaerfyrddin.

**Wendy Walters**

**Prif Weithredwr,**

Neuadd y Sir, Caerfyrddin, Sir Gaerfyrddin SA31 1JP

**Chief Executive,**

County Hall, Carmarthen, Carmarthenshire SA31 1JP



**BUDDSODDWYR | INVESTORS**  
**MEWN POBL | IN PEOPLE**

Mae Cyngor Sir Gaerfyrddin yn croesawu gohebiaeth yn Gymraeg neu yn Saesneg  
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Nododd y Grŵp Gorchwyl nifer o feysydd allweddol sy'n dylanwadu ar y materion sy'n wynebu cymunedau gwledig yn Sir Gaerfyrddin, ac mae llawer o'r rhain yn berthnasol nid yn unig i Sir Gaerfyrddin ond hefyd i ardaloedd gwledig ledled Cymru. Mae'r Cyngor yn gadarn o'r farn bod y FfDC yn gyfle i ganolbwyntio ar rai o'r materion hynny sy'n effeithio ar ardaloedd gwledig Cymru ac i roi sylw i heriau cymdeithasol ac economaidd ar lefel genedlaethol strategol allweddol. Yn sgîl y gwaith a wnaed drwy'r Grŵp Gorchwyl Materion Gwledig, byddem wrth gwrs yn falch o rannu ein profiadau a'n hargymhellion er mwyn mynd ati i gyflwyno ymateb Cymru gyfan cydgysylltiedig i'r heriau sy'n wynebu'r cymunedau hyn.

Mae pryderon hefyd ynghylch effaith y FfDC ar yr uchelgeisiau economaidd ac adfywio ar gyfer Sir Gaerfyrddin ac, yn wir, y rhanbarth. Fel y gwyddoch, mae gan Sir Gaerfyrddin hanes cryf o hyrwyddo buddsoddi a chreu swyddi. O gofio hyn, ac yn enwedig o ystyried y ffaith nad yw'r ardaloedd strategol ehangach wedi cael eu cynnwys yn y FfDC, megis Parth Cyflogaeth Strategol Cross Hands (a ddynodwyd yn barth twf o bwys rhanbarthol), mae pryderon penodol o ran cael seilwaith a chyllid yn y dyfodol. Er y deallir y bydd Cynlluniau Datblygu Lleol a Chynlluniau Datblygu Strategol yn ymateb i faterion rhanbarthol a lleol, byddai peidio â chydabod drwy gynllun cenedlaethol aneddiadau eraill o bwys rhanbarthol ar gyfer twf yn codi pryderon sylweddol o ran blaenoriaethau cyllido Llywodraeth Cymru yn y dyfodol. Gallai diffyg aliniad o'r fath, o ganlyniad, leihaeu eu cyfleoedd o ran adfywio a chreu swyddi.

Yn yr un modd, mae angen egluro'r effaith ar fentrau gweinidogol yn glir. Byddwch yn ymwybodol o'r cyfraniad y mae Tasglu'r Cymoedd yn ei wneud i gymunedau cymoedd Sir Gaerfyrddin. Yn y cyswllt hwn, dylai Drafft y FfDC ddarparu strwythur trosfwaol sy'n adlewyrchu ac yn ategu'r uchelgeisiau ar gyfer adfywio ar draws cymunedau ein cymoedd. Mae diffyg cydnabyddiaeth o gyfraniad parhaus cymunedau o'r fath yn fersiwn drafft presennol y FfDC yn mynd yn groes i nodau'r tasglu, ond nid yw ychwaith yn cydnabod y rôl allweddol sydd gan ardaloedd o'r fath a'u haneddiadau.

Croesewir y cyfeiriad at yr iaith Gymraeg yn y FfDC. Fodd bynnag, dylid egluro a chadarnhau rôl Comisiynydd y Gymraeg mewn perthynas â gwneud penderfyniadau ym maes cynllunio. Yn hyn o beth, mae'r FfDC yn cynnig cyfle i fod yn gatalydd.

Yn gywir, A

**Wendy Walters**  
**Y Prif Weithredwr**

**Wendy Walters**

**Prif Weithredwr,**

Neuadd y Sir, Caerfyrddin, Sir Gaerfyrddin SA31 1JP.

**Chief Executive,**

County Hall, Carmarthen, Carmarthenshire SA31 1JP



**BUDDSODDWR MEWN POBL** | **INVESTORS IN PEOPLE**

Mae Cyngor Sir Gaerfyrddin yn croesawu gohebiaeth yn Gymraeg neu yn Saesneg  
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Eich cyf / Your ref:

Gofynnwr am / Please ask for:

Wendy Walters

Fy nghyf / My ref:

Llinell Uniongyrchol / Direct Line:

Dyddiad / Date: 15th November 2019

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Ms. Julie James AM  
Minister for Housing and Local Government  
Welsh Government  
5th Floor  
Tŷ Hywel  
Cardiff Bay  
CF99 1NA.

Dear Minister,

**Re: Consultation Draft National Development Framework 2020 - 2040**

I write further to the consultation in respect of the Draft National Development Framework and would like to thank you for the opportunity to participate and provide the views of the Councils in respect of its content.

I have attached a full response using the consultation form provided which was subject to Council consideration on the 13<sup>th</sup> November 2018. I however, would wish to reiterate the authority's commitment to work collaboratively with yourselves and officials to deliver a Development Planning system which provides for the whole of Wales and its communities.

In relation to the content of the Draft NDF there are a number of points raised within the attached response which I will not reiterate in this letter.

However, of particular note is the relative absence of detail in relation to the role and value attached to our rural areas and communities and their contribution at a macro-economic scale but also as a contributor at an all Wales level. You may be aware that within Carmarthenshire a Cross Party Rural Affairs Task Group has been considering the future shape of our rural areas and has recently published its Report: Moving Rural Carmarthenshire Forward (June 2019): Report and Recommendations of the Carmarthenshire Rural Affairs Task Group.

**Wendy Walters**

**Prif Weithredwr,**

Neuadd y Sir, Caerfyrddin, Sir Gaerfyrddin SA31 1JP

**Chief Executive,**

County Hall, Carmarthen, Carmarthenshire SA31 1JP



**BUDDSODDWYR** | **INVESTORS**  
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The Task Group identified a number of key areas that influence issues facing rural communities in Carmarthenshire, many of which are pertinent not just to Carmarthenshire but also to rural areas across Wales. The Council is firmly of the view that the NDF represents an opportunity to focus on some of those issues affecting rural Wales and to address social and economic challenges at a key strategic national level. In light of the work undertaken through the Rural Affairs Task Group we would of course be pleased to share our experiences and recommendations as part of a move to implement a co-ordinated all Wales response to the challenges facing these communities.

There are also concerns in relation to the impact of the NDF on economic and regeneration ambitions for Carmarthenshire and indeed the region. As you will be aware Carmarthenshire has a strong track record in driving investment and job creation. With this in mind, and particularly given the absence from the NDF of the wider strategic areas such as Cross Hands Strategic Employment Zone (identified as a regionally important growth zone) there are particular concerns in terms access to future infrastructure and funding. Whilst it is appreciated that Local Developments Plans and Strategic Development Plans will respond to regional and local issues, the lack of national plan level recognition of other regionally important settlements for growth would raise significant concerns in terms of future WG funding priorities. Such lack of alignment may as a consequence diminish their regeneration and job creation opportunities.

Similarly, the impact on ministerial initiatives requires clear clarification. You will be aware of the contribution that Valleys Task Force makes to Carmarthenshire's Valley communities. In this respect the Draft NDF should provide an overarching structure which reflects and supports the ambitions for regeneration across our valley communities. The current Draft NDF's lack of recognition to the ongoing contribution for such communities' runs counter the taskforces aims, but also fails to acknowledge the critical role such areas and their settlements play.

The reference to the Welsh language in the NDF is welcomed. However, the role of the Welsh Language Commissioner in relation to decision making in planning should be clarified and reinforced. In this respect the NDF presents an opportunity to be the catalyst in this respect.

Yours sincerely

  
**Wendy Walters**  
Chief Executive

**Wendy Walters**

Prif Weithredwr,  
Neuadd y Sir, Caerfyrddin, Sir Gaerfyrddin SA31 1JP

Chief Executive,  
County Hall, Carmarthen, Carmarthenshire SA31 1JP



**BUDDSODDWYR** | **INVESTORS**  
**MEWN POBL** | **IN PEOPLE**

Mae Cyngor Sir Gaerfyrddin yn croesawu golybidedd yn Gymraeg neu yn Saesneg.  
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## **Consultation Response Form**

Your name	Wendy S Walters
Your address	Chief Executive, Carmarthenshire County Council, County Hall, Carmarthen, SA31 1JP
Preferred contact details (email/phone/post)	<div></div> <div></div>
<u>Organisation (if applicable)</u>	Carmarthenshire County 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Outcome 11 mentioned the need for Wales to become a sustainable, decarbonised society. In the context of new housing, we should be insisting on higher levels of energy efficiency for all new homes. This is not just about the individual homes, but potentially linking homes with other local facilities both in terms of location (reducing the need for car travel, enabling walking and cycling) but also enabling the development of district heating systems, which could include homes, schools, leisure facilities and workplaces.

## 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	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 Draft NDF sets out a clear drive for growth and development (residential and commercial) to be focused on Swansea Bay and Llanelli. From a Carmarthenshire perspective and for our region this represents a concern.

Whilst we welcome the fact that Llanelli is identified as a key development area, the NDF should incorporate the wider strategic areas such as Cross Hands Strategic Employment Zone, identified as a Regionally important growth zone in terms of providing jobs for the area and the wider economy; in order to achieve that objective transport investment and prioritised connectivity is needed.

In this regard Cross Hands is a key growth area for the County (supported by significant WG infrastructure funding) and contributes to growth within the region. On the basis of the NDF Carmarthen would have a regional albeit reduced role below that of Llanelli. Cross Hands, Ammanford etc. would have no significance. Whilst it is appreciated that local developments plans and Strategic Development Plans will respond to regional and local issues the lack of national plan level recognition of such settlements would raise significant concerns in terms of future WG funding priorities (which will be aligned to the NDF). Therefore other key towns and growth areas in our county – Cross Hands, Ammanford etc and even Carmarthen may not be able to attract the required funding and infrastructure



support thus diminishing their regeneration opportunities and roles within the County and region.

There has been a lack of reference to the current spatial and growth policies within the region – in this respect it is noted that Ammanford/Cross Hands is omitted (presumably on the basis of individual settlement population levels) despite its longstanding status as a 'growth area' within numerous development plans and as an area for investment and growth both within economic/regeneration strategies but also through the City Deal.

Similarly, the spatial strategy through the indication of a small number of regionally classified settlements fails to recognise the diversity across Carmarthenshire and many comparable Counties across Wales. In this respect the lack of recognition of several major rural market towns, as well as settlements such as Ammanford/ Cross Hands (see also response to question 11 for further discussion on this point), results in a spatial and effectively policy deficit for settlements across much of the region which have traditionally, and continue to, perform key functions in terms of providing homes, jobs and services. In this respect the spatial strategy and its understanding of rural areas, their settlements and communities would be strengthened through an explicit recognition of the role they play within their respective communities and as a contributor to the future of rural Wales.

Furthermore with growth focused on urban centres, the rural economy could be significantly disadvantaged with the consequential risk of increasing the proportion of older people living in such areas as young people migrate to city centres over a the life of the plan. The travel needs of rural communities will need to be met, in the short and medium term, with investment in public transport and infrastructure, in not making such provision rural deprivation is likely to be significantly increased.

Focusing investment on development areas only, will exacerbate current traffic growth and add to congestion on key strategic routes; it is worth noting that Carmarthenshire which has limited reference within the NDF other than green energy and Llanelli development has the 3<sup>rd</sup> highest traffic volumes in Wales approximately 1.3 billion vehicle miles p.a. Displacement of this existing travel demand will create concentrated areas of traffic growth and congestion stymying economic development.

In noting the aspirational nature of the NDF, the developmental focus on Swansea Bay and Llanelli should be qualified by those notable developmental considerations that need to be recognised even at a strategic level. Such considerations include the internationally protected waters of the Burry Inlet which bound Swansea and Llanelli. The identification of the Swansea Bay metro is welcomed, however there remains a lack of certainty and clarity with regards its implementation which renders this as largely aspirational at this time.

Reference to the importance of a METRO system to underpin development and mobility is welcomed, however the NDF does not reflect the true scope of the METRO being developed within the Swansea Bay City Region on instruction by the Wales Government; rather it appears to only capture a small area in the east of the region.

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

Fundamentally reference should be given to Policy 23 and 24 of the NDF which estimates a requirement for 23,400 homes within the Mid and West region during the NDF period. By setting such a low figure for housing requirement in general it will undoubtedly have a knock on effect on the number of affordable homes that can be developed during this period. The planning system seeks to maximise its contribution to delivering affordable housing. Less housing allocations within Local Development Plans as a consequence of a lower housing requirement, will result in much less supply of housing land for developing affordable houses.

Whilst we support the notion of increasing the delivery of affordable housing and the various mechanisms to achieve this, there is little substance within the Policy and supporting statement to show how this is to be achieved.

Public funding and land will be needed to deliver the number of affordable homes that are needed. The needs of older people are mentioned. The approach should be to make all new homes as accessible as possible to people with reduced mobility, so that older people, and younger people with disabilities, have more choice about where they can live. This should apply in both affordable and open market homes. Some older people and people with disabilities will prefer to move to specialist housing. It should not be assumed that all of these homes will be supported with public subsidies. The private sector should be contributing to meeting this need, even if providing other types of homes are more profitable.

Rural areas – there should be an emphasis on the importance of delivering new affordable homes in rural areas to create sustainable communities, based on identified local need.

#### 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	<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"/>	<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?

N/A



### 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?

[illegible]

- 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 Council welcomes the positive approach in relation to Ultra Low Emission Vehicles. We also welcome the recognition of the need to roll out the infrastructure particularly noting provision in rural areas.

## 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?

[illegible]

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

The provisions of the NDF in relation to the development of District Heat Networks is noted as is the current expectation that LPA's consider them as part of the preparation of their current LDP's. The potential benefits are acknowledged, however, the costs associated with their implementation can be significant and may be prohibitive. In this respect the statements in relation to their viability are noted, as is the identification of Llanelli as a potential location. Further detail on the support available to local authorities and the development industry on the development of appropriate evidence and the delivery of such networks should be referenced or provided.

The identification of a significant proportion of Carmarthenshire for wind and/or solar energy is noted as is the initial supporting evidence. We welcome the clarification that not all areas within the 'Priority Areas' would be suitable and that careful consideration will be needed. However, the inclusion of the map as it stands ahead of the necessary refinement exercise could be considered as misleading particularly given their large geographical extent. We look forward to the further clarity arising from the detailed refinement work.

We would also welcome an understanding how the evidential work fits with the requirements of the current Technical Advice Note and the Toolkit.

Further evidence is needed beyond the priority areas identified before detailed consideration can be given the suitability of the priority areas identified. However, at



this stage there would be concerns over their spatial extent.

Q6. Agree - We welcome these policies and the recognition they give to the importance of Green Infrastructure. Policy 8 allows for the holistic consideration of green infrastructure and set a positive direction for local policy and the NRW Area Statements.

We welcome that Policy 8's supporting text explicitly notes that safeguarding does not necessarily prohibit development.

The supporting text to Policy 8 acknowledges the importance of green infrastructure in urban areas, however, we would suggest that GI also plays a vital role in rural areas, particularly in agricultural areas where land is intensively farmed, and where areas connecting strategic GI areas should be safeguarded.

## 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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

## 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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## 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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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.

Question 10 - There would not appear to be a clear methodology for the identification of settlements across the respective regions. If, as it appears, the approach is centred on population levels this does not allow for recognition of the key roles which many large settlements play within their regions. This is notably applicable to market towns, or those settlements where there may be a combined population arising from an interconnected spatial form. In relation to the proposed policies and approach for the Mid and South West Region and its significant rural components, this approach fails to recognise the key and often strategic role settlements within such areas have within their rural communities. The exclusion of such settlements including examples such as Lampeter, Llandeilo and Newcastle Emlyn fails to reflect a broad understanding of the region and how communities are served and function.

In formulating the policy and developing the methodology there has been a lack of reference to the current spatial and growth policies within the region. In this respect, it is noted that Ammanford/Cross Hands is omitted (presumably on the basis of individual population levels) despite its longstanding status as a 'growth area' within numerous development plans and as an area for investment and growth both within economic/regeneration strategies but also through the City Deal.

It is noted that 23,400 additional homes have been identified within the Mid and South West Wales Region until 2040. Whilst it is noted that this is based upon current WG projections, they do not provide a positive basis for growth, ambitious policies and job creation. In this respect, it is noted that the projections are predicated on a 5-year trend and are not reflective of future interventions or indeed market changes. The reference to them as estimates is noted as is the clarification

that they provide a part of the evidence and context upon which the housing requirements for SDP's can be based. However, the NDF should be explicit and clear that, where evidenced, alternative growth projections will be appropriate within and across the region, particularly given the need to deliver the priorities associated with the delivery of a strong city region.

The supporting statement in respect of 'A strong rural Wales' is noted. However, it should be founded on an understanding that rural communities and their settlements vary considerably in character and scale. In this respect, there is a need to be adaptive to the needs of such communities and a one size fits all approach would not be appropriate. The role of the 'regional centres' is important, but these should not be the focus for growth at the expense of other rurally located settlements and communities. With this in mind, the reference to considering how jobs, services and homes in rural communities can help sustain themselves needs to include a realisation that many of our rural settlements are relatively small and have lost services such as schools, shops, post offices. Consequently, policies at a national and more localised level need to respect that they are places where people live and potentially work which may not necessarily be in the most sustainable locations. To preclude them from receiving a suitable (and proportionate) level of growth will lead to further depopulation in many of these rural communities and under investment in the key infrastructure needed to promote inclusivity and to improve their sustainability.

The text in relation to policies 23 – 26 is largely silent on the importance of agriculture across most of the region. In this respect, its value as a component for economic prosperity, and not just as a feature of the area's diversity, should be fully embedded in this section of the NDF.

The recognition of the role and function of settlements should not be seen purely in terms of their potential to accommodate growth, but should also be informed by their wider contribution to servicing the needs of local residents and the wider community.

There is a lack of effective connections within the NDF to initiatives and commitments made by ministers. In this respect the initiative such as the Valleys Task Force. The Draft NDF should reflect the ambitions to support the regeneration across our valley communities.

From a Carmarthenshire perspective the taskforces inclusion of the Gwendraeth and Amman Valleys was an important and positive step in reflecting the cultural relationship but also the regeneration ambitions for the settlements within these areas. The Draft NDF's apparent lack of regard to the ongoing contribution for such communities' runs counter the taskforces aims but also fails to acknowledge the critical role such areas and their settlements play.

Regional Transport Structures - Reference to the different regional structures for transport and planning. Transport structures are aligned to major drivers of movement i.e. Economic Development, the alignment of the planning process to the



City Deal areas is important. The proposed arrangement of 3 regions does not fit with existing transport and regeneration strategies currently supported by statutory policies, established governance and delivery structures which reflect the nature of development and movement across the Swansea Bay City Region as a whole.

Reference to the importance of a METRO system to underpin development and mobility is welcomed, however the NDF does not reflect the true scope of the METRO being developed within the Swansea Bay City Region on instruction by the Wales Government; rather it appears to only capture a small area in the east of the region.

The movement of people and goods East to West is vital to the delivery of an effective National Development Framework, as such it is surprising that there is no reference to the important Trans European Network (TENS) which runs from Russia in the East to Ireland in the West through the length of the East West corridor in the Swansea Bay City Region, thus providing important Local, Regional, National and International connectivity so important in attracting inward investment.

Given the above comments regarding lack of emphasis outside identified priority development areas, there appears to be a disconnect with some key established policy drivers in particular the Well Being of Future Generations Act which references amongst its key wellbeing goals:

*A Wales of vibrant culture and thriving Welsh language*

*A Wales of cohesive communities*

## 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 comments

## 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?

P23 Swansea Bay and Llanelli

It would appear that little consideration is given to water quality issues on CBEEMS. Impact upon water quality is briefly mentioned as a potential effect, however, the mitigation for this is minimal.

The general statement of 'Avoid allocating new development within, or directly adjacent to, Natura 2000/ Ramsar sites to reduce/ minimise impacts on such sites (for example, avoiding land adjacent to the coast known to be functionally linked to adjacent SPA/ Ramsar sites)' is difficult to implement at a plan level in Llanelli, as the majority of development will be functionally linked to CBEEMS through the waste water treatment disposal. This is overlooked in the appropriate assessment of this policy.

## 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?

We support the positive and ambitious aims outlined in Outcome 4 in respect of the Welsh language, and in particular welcome the recognition given to the importance of providing jobs and homes to support the language in Welsh speaking communities. However, it is not clear whether outcome 4 alone will have a positive impact upon the Welsh language given that there is no other guidance within the document to build upon the outcome.

It is presumably considered a matter for LDPs to consider how the land use planning system can support the Welsh language. It will therefore be entirely down to the content of respective LDPs to deliver on the NDF's outcome. However, given that the growth of the Welsh language is one of the outcomes of the NDF and that its importance has been acknowledged in respect of all three regions, we consider that it should be categorised as a strategic matter of national importance and further elaboration and guidance through a policy should be provided.

In terms of education and the Support for Welsh Language (million welsh speakers by 2050) – the draft NDF states that in locations where Welsh is not the language of the community 'Education Authorities will lead in developing infrastructure to enable the language to develop as a natural, thriving part of communities'. This does not seem to coincide with Welsh in Education Strategies and 21<sup>st</sup> Century Schools Strategies whereby investment should be prioritised to support investment in Welsh Medium Education regardless of location.

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.

For Carmarthenshire, the retention of young people in the County is a key contributor towards increasing the proportion of Welsh speakers in the County. There is an outflow of young people from Carmarthenshire, partly in search of higher education



but also in search of employment and housing. To retain the young population within Carmarthenshire, it is therefore considered key that planning policy makes suitable provision for the creation of varied job opportunities and homes.

Carmarthenshire is a County of contrasts, with the more urban and post-industrial areas in the south and the more rural areas to the north and west. The provision of homes and jobs must be provided across each area of the County, and should not be restricted to the urban areas. It is therefore disappointing that the NDF does not acknowledge nor reflect in policy the strategic importance of developing job opportunities in rural areas or based upon rural and agricultural industries. We would have concerns about the sustainability of the Welsh language in rural areas on the basis that there does not seem to be much emphasis or acknowledgement of the importance of providing employment opportunities in rural areas, where they align with homes and other services and facilities.

Another potential issue is the compatibility of the Draft NDF with PPW. The NDF is clearly ambitious in terms of its hopes for the Welsh language. We consider that in order to deliver on this ambition, there will be a requirement for development to proactively contribute towards creating opportunities for the Welsh language to develop and grow. However, the guidance set out in PPW on the whole requires development to simply safeguard the Welsh language rather than to create opportunities for it to grow.

We consider that clearer and stronger compatible guidance through PPW and TAN20 would assist Local Planning Authorities to develop robust LDP strategies which can positively contribute towards creating opportunities for the Welsh language to develop and thrive. Of specific assistance would be examples of best practice in terms of assessing the impacts of local plans on the Welsh language and the provision of a standardised Welsh Language Impact Assessment methodology.

## 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?

General comments:

The Council recognises the position of the NDF in considering issues at the national

stage and the clarification that it provides as well as the direction, policies and key issues the Welsh Government requires the regions to take forward. In this respect, the Council welcomes the clarification that the NDF does not seek to remove the local context for delivery. This recognition of the role of local plans in identifying the exact location for new development, the scale of growth in individual settlements etc is essential in allowing LPA's to respond to needs at a local level.

The emphasis on increasing prosperity and reducing inequality is welcomed, as is the recognition that prosperity is not equal across Wales. The need to tackle exclusion borne out of issues such as prosperity and inequality should also be extended to our rural areas with the issues of loneliness and mental health well documented in agricultural communities. In this regard the policy approaches should reflect such positive interventions.

Chapter 2 Wales: An Overview – Challenges and Opportunities. It is noted that the overview element of the chapter fails to reference the agricultural economy and the role our farming sector plays and has played within the Welsh context. This is a significant omission and reflects a lack of focus on rural areas and the economic opportunities a positive approach in such areas can provide within a County such as Carmarthenshire. In this respect the Draft NDF should reflect the role of the rural economy as a key driver for Carmarthenshire (as well as many other parts of Wales). The further reference to both agricultural funding within the context of the potential challenges arising from Brexit is noted. The recognition that it represents an area of major public policy (shaped by wider European policies and funding) and that the NDF seeks to provide a positive, proactive framework for growth and investment is welcome.

The Council welcomes the emphasis on retaining and attracting young people.

In general, very little reference is made to education, 21<sup>st</sup> Century schools in particular. It is therefore unclear how future investment as part of the 21<sup>st</sup> Century Schools programme will fit in with the Draft NDF. It would seem from the information available that investment will predominantly be supported in urban areas and will become a requirement in the business cases for investment. This could make it difficult to invest in rural areas with issues around the long-term sustainability of communities.

Rural Schools, presumption against closure – The WG has introduced a presumption against closure for rural schools in Wales and federation is being promoted to support this. The School Organisation Code identifies rural schools, however, the draft NDF suggests that development plans will need to develop appropriate definitions of rural areas.

Population growth – based on the provisions and policies of the Draft NDF that the

further focus of growth in urban areas will increase the rural/urban population split potentially making smaller rural schools unviable and putting significant pressure on urban schools.

The WG ambition to create a circular economy within Wales with the ability to create new resources from waste and recycling will require significant infrastructure development if this is to be possible. This should form part of the overall aim of the NDF. At present there seems to be little reference.

In recognising that the NDF seeks to provide a high level direction of travel on a national level, it would be disappointing if there is not some recognition of the value of community 'bottom up' planning – e.g. place planning. In this respect, there may be scope to recognise that there may (in some instances) be 'bottom up' led solutions to certain strategic spatial planning considerations which would align with the strategic priorities of the NDF. Such approaches could be particularly relevant to those areas that are located outside of the 3 main areas identified for growth.

Page 8 of the NDF provides a recognition of Well-being of Future Generations Act 2015 and the National Development Framework and states that the Act gives a legally-binding common purpose – the seven well-being goals – for national government, local government, local health boards and other specified public bodies. In this regard, further elaboration on how the future investment of the local health boards has informed the NDF would be welcomed. A similar theme would be for key infrastructure providers, not least of which would be Dwr Cymru. Has the NDF followed the lead of such partners, or it is the intention that the partners would follow the lead of the NDF?

The retail sector and strategic employment sites are also important drivers of economic activity for key towns such as Carmarthen, Llanelli and Cross Hands. Carmarthen for example, attracts visitors across the region as a retail centre. In this respect transport connectivity is important if such centres are to attract external spend. In this regard the Local, Regional and National Supply chain resilience is of paramount importance, including through support provided to the local agri- food sector. Whilst, this may be argued as a local matter that broader resilience will be essential to the economic prosperity across Wales and the NDF must ensure that moves to change the spatial landscape of Wales is not at the expense of Wales population to access such services.

It would be useful to understand the rationale and evidence base that underpins the selection of the priority development areas and associated movement corridors



**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>	Y
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