

Draft National Development Framework

1. NDF Outcomes (chapter 3)

Q1. 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?

Disagree

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

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

The Council considers the outcomes to be ambitious and are not convinced that they can all realistically be achieved. Outcome 10: The Council supports biodiverse, resilient and connected ecosystems but has concerns with the reference to "we will reverse these losses" as this is misleading and not achievable. It is suggested that it should either refer to 'increase biodiversity' or 'reverse the decline'. Outcome 11: The shift towards a low-carbon economy is supported however the word 'decarbonised' suggests that Wales can be carbon free by 2040 which is not a considered to be realistic outcome.

2. Spatial Strategy (policies 1 - 4)

Q3. 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				

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

The Council supports the spatial strategy's identification of Blaenau Gwent as part of the South East Wales region and in a "National Growth Area". However, it is considered that the focus of growth in Cardiff and Newport may well be at the expense of the Valleys.

Policy 1: The principle that development should primarily be focussed towards existing settlements, especially where they benefit from transport networks that support sustainable travel is supported. Though this should not rule out new settlements where this is a more sustainable choice.

Policy 2: The principle of supporting urban centres by locating public services in city and town centres is supported though it must be recognised that the potential to find significant sites to accommodate public service developments will be difficult in some towns and city centres. In such instances (exceptional circumstances) it should be acknowledged that such development should be located in places 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. Part of the issue with this policy is lack of clarity in terms of what is meant by town and city centres? Is it the retail boundary drawn around retail cores? This needs to be clarified.

Policy 3: The principle of giving positive consideration to the future use of publicly owned land is generally supported. However, the Council currently uses capital receipts from land disposal to deliver other strategic objectives such as 21st Century schools programme and regeneration initiatives. Welsh Government either needs to support Council's financially to deliver these agendas or leave it to Councils to determine how they proceed with individual sites. Otherwise it will inhibit Local Authorities whose priorities differ from those identified by Welsh Government.

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

- Few places have been labelled, causing difficulties for users who are not familiar with the geography of Wales.
- Regional growth areas should be identified in the South East region to be consistent with the approach for the North and Mid and South West regions
- Ebbw Vale should be identified as a centre of regional growth centre
- It is unclear which places the intra-urban connectivity relate to.
- Regional connectivity is shown on the Wales diagram between Mid and South East Wales but this link is missing from the regional map.

3. Affordable Housing (policy 5)

Q5. 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?

Disagree

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

The general aim to increase affordable homes to meet need is supported though the Council has a number of issues with the approach.

The Policy states that SDPs and LDPs should set development plan targets based on regional estimates of housing need and local assessments. It is not clear if the regional estimates of housing need by tenure referred to in the NDF are the basis for the WGs prioritisation of affordable housing or if they are intended to be used as targets for SDPs and LDPs. The NDF identifies that in South East Wales there is an annual need for affordable housing units ranging between 2,000 and 2,500. Using the central estimate, this equates to 48% of housing in the first 5 years. The NDF needs to clarify the status of the estimates of housing need.

The statistical release for the Estimates of Housing Need provides caveats that they are estimates based on a given set of assumptions, aimed at forming a basis for policy decisions. The estimates of need "should not be used as affordable housing targets" and therefore Policy 5 should be reworded to state that regional estimates of housing need should form part of the evidence base for affordable housing targets, rather than basing SDP targets entirely upon these estimates. Unless this is clarified there is a concern that the target of 48% should be affordable might dictate that similar targets are included within the SDP/LDP. This is not desirable or appropriate.

Affordable housing targets in LDPs are based not only on need but also on deliverability/viability. In Blaenau Gwent 48% affordable housing provision is not viable or deliverable or indeed a desirable mix in most instances. Our priority is to diversify the housing stock and retain the existing population. Blaenau Gwent has a shortage of 4 bedroom homes and meeting the need for affordable homes is only one element of a wider housing picture.

The supporting text for the policy correctly recognises that the private sector has been unable to meet the affordable housing shortfall, and that LAs, RSLs and SMEs will have a role in delivering more homes. LAs and RSLs should continue to have access to Welsh Government funding to help deliver affordable housing, and this funding should not only be focussed but increased to maximise delivery.

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

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

Finally, it should be recognised through the NDF that in order to make quality places with cohesive communities where people want to live, new housing developments need to deliver a mix of house types and tenures. It would be inappropriate to plan for large scale housing developments where the proportion of affordable is too large and fails to create a sustainable mixed community. Delivering the identified need of 47% affordable housing on large scale sites is unlikely to be desirable as it could not be 'pepper-potted' appropriately or enable sustainable mixed and balanced communities to be created.

4. Mobile Action Zones (policy 6)

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Agree

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

The Council agrees with the identification of mobile action zones to encourage better mobile coverage. It also agrees with the commitment to ensure all parts of Wales are supported by the telecoms infrastructure they need. Intervention should also be targeted to support the economy and communities most in need. It is disappointing that these action zones are not identified, though it is understood that they will change over time.

5. Low Emission Vehicles (policy 7)

Q9. 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?

Agree

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Agree that the policy will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles. The policy will need to be supported by the appropriate regime changes such as Building Regulations and the Highways Act.

The approach will need to be supported by radical changes to sustainable transport infrastructure across Wales to tackle other transport issues such as congestion.

6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Agree

7. Renewable Energy and District Heat Networks (policies 10-15)

Q12. 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		

Q13. If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

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

The priority area includes a large part of Blaenau Gwent and this would result in significant landscape impact and is strongly opposed.

Whilst the encouragement for district heating networks proposals is welcomed and there is recognition that in principle, they are supported wherever they are viable it is disappointing to see that Ebbw Vale is not referenced given previous and existing work being undertaken to develop District Heat Networks.

An alternative approach to renewable energy is consideration of both tidal and off shore generation, both of which could make significant contributions in terms of energy generation, whilst having less landscape impact than large scale onshore developments.

8. The Regions (policy 16)

Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?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.

Strongly agree

9. North Wales (policies 17-22)

Q15. 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?

No opinion

10. Mid and South West Wales (policies 23-26)

Q16. 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?

No opinion

11. South East Wales (policies 27-33)

Q17. 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 disagree

Q18. If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

Policy 29: Whilst the sentiment of the policy is generally agreed there is a lack of detail in the supporting text on how prosperity is to be increased and social equalities addressed. The dualling of the A465 has created excellent access to the Head of Valleys, providing a link between two existing industry Hubs (Port Talbot Waterfront and Ebbw Vale Tech Valleys) within Wales as well as national links with the Midlands and Ireland (Trans European Link). In order to boost the regional economy and attract external investments as well as local and international talents, the NDF should advocate that full advantage of this infrastructure should be taken.

The NDF should target new employment and tourism opportunities along the A465 corridor in an effort to transform the image and culture of the Heads of Valleys. The NDF should also recognise and promote the HoV aspirations for the creation of an innovation and energy corridor. Reference should be made to Tech Valleys and the Blaenau Gwent Enterprise Zone.

Despite having its own Policy, the Heads of the Valleys area is not identified on the map and it should be.

The NDF states "Under the Welsh Government central estimates 71,200 additional homes are needed in the region until 2038 and over the initial five years (2018/19 to 2022/23) 48% of the additional homes needed should be affordable homes." Firstly, the inclusion of housing estimate figures under a policy on the Heads of the Valleys causes confusion in respect of whether they relate to the Heads of the Valleys area/authorities only, or whether they relate to the South East Wales Region as a whole. It needs to be more explicit that these figures relate to the whole region.

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

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

The figures lack any ambition and would not enable the Cardiff Capital Region to fulfil its aspirations.

Policy 30: One of the most prescriptive policies in the Draft NDF is Policy 30 on Greenbelts. Whilst the Policy itself requires the identification of greenbelts through a Strategic Development Plan to manage urban growth in South East Wales, it refers particularly to land around Newport and the eastern part of the region. The map identifies a large swathe of land in the eastern part of the region and this is considered to be too prescriptive and should be deleted. Furthermore, other parts of the region where a green belt is justified, such as to the west or north of Cardiff has been omitted and should be included in the text of the policy.

Policy 31: Encourages growth in sustainable transit orientated settlements and identifies a number of towns to function as key centres where regeneration and sustainable economic growth will help deliver the ambitions of Our Valleys, Our Future project. The Council strongly objects to the exclusion of Ebbw Vale from this list. Ebbw Vale is a Strategic Hub according to the Valleys Task force and has a rail station due to benefit from metro investment to upgrade services. It also has significant opportunities for sustainable economic growth through two large mixed use sites delivering both housing and employment opportunities and the Motor Sport Wales proposal. There is a commitment from Welsh Government to invest £100 million over 10 years. Given the emphasis on the Heads of the Valleys it is disappointing that only one centre for regional growth is identified in the area by the NDF.

Policy 33: The policy to establish the Valleys Regional Park is welcomed although the NDF could provide more detail on what this entails in the supporting text. There is little detail on other tourism opportunities even though tourism is seen as a major part of transforming the Heads of the Valleys.

The policy text contains the heading "Rivers and Valleys" and the text relates to minerals activity which bears no relation to the subject of the policy. This should be omitted from this policy.

12. Integrated Sustainability Appraisal

Q19. 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 Response

13. Habitats Regulations Assessment

Q20. 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 Response

14. Welsh Language

Q21. 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 Response

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: 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 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.

No Response

15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

General

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

There are a number of places within the document where two policies have been included at the top of a page, and the supporting text for more than one policy has been included below it. Whilst the policy that each paragraph refers to has been referenced, the separation of the policy from the supporting text

affects the flow of the document and we would suggest it is reordered so that the policy wording and supporting text are together, in order to improve clarity.

Alternative Proposals

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

- M4 (Brynglas Tunnels) and the costs to the Welsh economy. The recent decision by the Welsh Government to not progress the Second M4 means that the existing issues with the Brynglas Tunnels remain. The congestion and closures that occur because of the tunnels has a massive cost and impact on the economy of Wales as a whole, and will continue to be detrimental to economic growth. The lack of acknowledgement or consideration of road being the mode for freight in Wales, along with the support for electric vehicles means this problem will remain for a significant period into the future, compromising Wales' ambition to deliver significant economic growth.
- A465 Heads of the Valleys Road. No reference is made to the contribution that this significant artery into Wales can have in delivering national and regional development. The Valleys Taskforce has set out aspiration and proposals for the Heads of the Valleys area and key to delivering these is maximising the benefits of the investment that has been made by Welsh Government on this national artery. It is surprising that the NDF does not include specific policies on maximising the benefits of the improvements within this area.
- There is no mention of freight in the NDF. Freight is a significant contributor to climate change and the impacts of heavy goods vehicles on the road structure requires significant funding to maintain the damage done by lorries. The electrification of the railways provide the opportunity to set out ambitious modal shift targets for freight from road to rail, particularly where the freight is going to the ports or elsewhere on the mainline rail network. Freight is also a major contributor to the problems at Brynglas Tunnels and delays to freight movements as a result of this issue are one of the main costs to the Welsh economy.
- There is little in the NDF that relates to improving linkages between north and south Wales, an important issue given that movement between them is problematic unless routes outside Wales are used.
- In terms of renewable energy generation no mention is made of offshore wind generation or the potential for Tidal Lagoons to generate significant levels of renewable energy. Both of these options have the potential to cause less damage in terms of landscape and ecological impact, whilst generating significant levels of renewable energy. The NDF purely concentrates on onshore wind and solar generation and district heating networks at the expense of a holistic policy approach to delivering renewable energy.
- In addition to the significant omissions outlined above, the NDF provides no policy framework for a number of land uses, including retailing, recreation and leisure, minerals, tourism, and general infrastructure. Whilst it is acknowledged that there are a number of documents that sets out national strategies for some of these issues, the purpose of the NDF is to give a spatial context to issues of national importance to provide the spatial framework for the policy framework at lower tiers. Without this spatial context these issues remain open to interpretation at lower levels and may not end up delivering national objectives. Fracking being one such consideration that could be set out at this level.

Question 6 (policies 8 & 9) Green Infrastructure (no box available to insert comment)

Whilst the recognition of the important role Green Infrastructure plays is welcome there is an issue with the identification of the areas to be safeguarded as ecological networks and opportunities for the green infrastructure to be maximised in LDPs. Timing of the production of Area Statements and the production of Replacement Plans will make it difficult for such areas to be identified in emerging plans. Similarly there is a timing issue with emerging WG guidance on Green Infrastructure.

Whilst tree planting, the development of a national forest and the need to manage existing and future woodland areas are all supported there needs to be recognition that this will need to be financially supported.

It is disappointing that no indication is given as to the location of the national forest in the NDF.

16. Are you...?

Q24. Are you:

Submitting a response on behalf of an organisation

Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

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Organisation (if applicable)	Blaenau Gwent County Borough Council
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Q26. If you want to receive a receipt of your response, please provide an email address.
Email address

[REDACTED]

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response