

From: [Kelly Evans](#)
To: [NDE](#)
Cc: [REDACTED]
Subject: SWW POSW response to NDF
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Attachments: [image001.png](#)
[SWW POSW response to NDF.docx](#)

Good morning, please find attached response from SWW POSW.

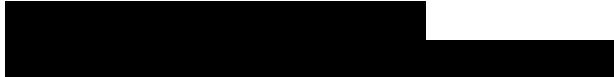
Many thanks

Kelly Evans

Swyddog Cymorth Rheoli/Management Support Officer

Uned Cynnal Business (Adran yr Amgylchedd) – Business Support Unit (Environment Department)

3 Heol Spilman, Caerfyrddin – 3 Spilman Street, Carmarthen



Mae croeso i chi gysylltu â mi yn Gymraeg neu Saesneg

You are welcome to contact me in Welsh or English

Gyda'n gilydd gallwn lunio'n Hamgylchedd

Your Environment - let's shape it together



Response from South west Wales Regional POSW to the National Development Framework November 2019

The South west Wales Regional POSW group welcome this opportunity to provide comment on the draft NDF.

The group 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 group 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.

Outcomes and Overall Strategy

The stated outcomes are overall lacking in ambition and below the level of what would be expected for a truly visionary, distinctive National planning document to be the driver for the new strategic planning agenda in Wales and its Regions. Whilst it is absolutely right that this first national framework for Wales should be appropriately balanced - in terms of ensuring its aspirations are deliverable and not unduly unique - there is an over-riding sense that the targets are pitched somewhat below what is expected in terms of what such a long term Plan should aspire to achieve. The NDF should offer a bolder vision on this basis.

The omission of a clear, positive policy on what is the highest priority overarching principle of good planning in Wales – i.e. placemaking - is a significant failing of the draft NDF. Whilst the explanations of what placemaking is, and its importance, is set out in PPW, there is a clear need for the development plan for Wales to set out in unequivocal terms what government's strategic policy is for ensuring new development accords with placemaking requirements, as set out in its supporting guidance. Policy 1 of the NDF could set out the terms of this placemaking policy and relate it to the roles and responsibilities of national government, local authorities, other public sector and the private sector in delivering these key aims. This lies at the heart of nation building that the NDF will provide the overarching Plan to guide and facilitate.

Policies 23 – 26 - Those relating specifically to the Mid and South West Wales (MSWW) region

Overarching comment:

The notion of a MSWW region being a coherent one for strategic planning purposes is highly problematic. Such a Region covers a vast land mass stretching to opposite ends of the Country, and includes Authorities with significantly contrasting geographical areas and character. This poses a huge challenge in terms of describing the Region as being any sort of cohesive entity in terms of making cross-boundary decisions on a collective basis. For example, unlike the other Regions, much of the MSWW Region is not a viable commuter area into the main City Centre growth area (Swansea) where substantial future investment will be focussed in order to drive future economic uplift and create significant new job opportunities. A South West Wales Region of Swansea, Neath-Port Talbot, Carmarthenshire and Pembrokeshire represents a more meaningful, coherent planning region. The four Councils in South West Wales have a long history of joint working, and share a greater amount of cross-border working than that with the Mid-Wales authorities. Mid-Wales authorities have previously shared in this same consultation a complementary view, that their predominant development needs and patterns differ from that of South West Wales. By having four regions instead of three (which would split South West and Mid Wales into separate areas) would not only support the distinctive characters of these geographical areas, but would also better align with the aims and programmes of the Swansea Bay City Deal.

The proposed arrangements to combine mid and south-west Wales are not considered ideal for any of the six constituent councils. A more logical South West Wales region would deliver better and more coherent regional strategic planning for housing, economic development, transport and health. There would be potential financial benefits via cost reduction and WG incentives. The scale, power and sphere of control of the collaboration would constitute an improved inward investment offer. There would be greater consistency of governance than the ad hoc current arrangements. We would secure greater freedom from regulation and the general power of competence.

The MSWW Region Diagram (pg 57) is generally clear, but this is somewhat at the expense of showing much information at all regarding nationally significant issues/proposals for this vast area of Wales. It omits elements that are in the national schematic map (page 25) for no obvious reason. The map would benefit from showing the AONB and National Parks. It should also highlight the significance of Swansea City Centre (by perhaps using a different or larger symbol on the key) as the focus for the Region in terms of city centre scale transformative growth (as should be the case for Cardiff and Newport in the SE Diagram). The intra-urban connectivity symbol on the diagram needs amending to demonstrate that this is intended to represent significantly enhanced connectivity infrastructure that goes into Swansea, which will be the major city centre growth area for the Region. Recommend that this annotation takes a curved or 'bended' form to illustrate this. The Metro symbol occupies a curious position and it is considered

that it is problematic to illustrate this proposal just by means of a symbol at an arbitrary location within the region – as indeed is also the case for the South East Wales schematic map (on page 63). The MSWW Region Diagram shows no clear aspiration for enhanced connectivity between the south and north of the MSWW region.

Policy 23 - 'Swansea bay and Llanelli':

Policy 23 should be re-named to refer to the 'Swansea Bay and Llanelli National Growth Area, or alternatively 'South West Wales National Growth Area', in order to avoid the interpretation of the policy highlighting just Swansea and Llanelli as named areas. A similar re-naming strategy can be followed for the NGAs in the North and South East Wales Regions.

Policy 23 appears to set out a proposed settlement hierarchy, and yet Policy 16 of the NDF states that the settlement hierarchy should be identified in the SDP. Should the settlement strategy for the region not be based on the evidence base that would be prepared as part of the regional planning process to underpin the future SDP? The basis for assessing housing requirements is not clearly set out in the amplification to the policy. It states that the WG central estimates provide part of the evidence and context on which Housing Requirements for Strategic Development Plans can be based and should be considered at the regional scale.

Policy 23 and its supporting text appears to give Swansea, Llanelli, Port Talbot and Neath equal status as centres of national growth and does not acknowledge the clearly different character, role and function of each.

Policy 26 - Swansea Bay Metro:

Policy 26 is clearly very high level and is no more than highlighting a commitment of government to work with agencies (does that include private sector?) to plan the Metro and to support growth that would capitalise on its delivery. Most fundamentally, the policy does not sufficiently clarify the nature of the proposed Swansea Bay Metro. The policy clearly needs to be more descriptive in terms of the scheme and the specific opportunity that it presents, and to give some description of the options available to deliver what would be a massive investment on a scale beyond anything seen for many decades.

The Metro project will enable a greater use of sustainable transport means to deliver improvements to network capacity, connectivity and poor air quality caused by vehicle emissions. The project will seek to consider how transport provisions can contribute to the aims of the Wellbeing of Future Generations (Wales) Act and the decarbonisation agenda to meet the needs of our growing populations.

Would welcome greater clarification for how the Welsh Government expects the Metro to sit within the policy context, and furthermore how the Welsh Government intends to liaise and interface with the Councils to support its development and delivery over the coming years.

Other general Observations regarding the regional context:

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. 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.

There are also concerns in relation to the impact of the NDF on economic and regeneration ambitions for the region. 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.

An additional policy for the MSWW Region to highlight the future role of the designated National Parks and AONB is considered necessary, which would lay the foundation upon which SDPs could build. These are highly significant, nationally designated areas, that are a distinguishing feature at a national scale, and the NDF has an important role in identifying the opportunities and responsibilities for these areas. Such Areas provide an opportunity for increasing tourism activity in a sustainable manner and a clear framework should be established in the national plan relating to the fundamental need to protect and enhance these areas as national assets. More broadly in relation to AONBs, whilst there is a scattering of references to AONBs in the document (e.g. p12 Challenges and opportunities talks about living landscapes), generally speaking the conclusions and recommendations of the Future Landscapes work that has been undertaken across Wales are not apparent in the draft NDF. Looking at NPs and AONBs together as the designated landscapes of Wales. AONBs and NPs are nationally important assets, designated for the benefit of the nation and to protect their unique landscapes. Their national importance is recognised and stated in Planning Policy Wales, so the Council suggests they should have the same national consideration in the NDF.

The NDF approach to Green Belts lacks evidence, clarity or balance. The lack of a proposed Green Belt in Mid and South West Wales puts the region at odds with North Wales and SE Wales Regions in this regard. Whilst the NDF does not highlight a specific location for a Green Belt in the Region, the same provisions stated for the North Wales Green Belt Policy (Policy 19) applies to MSWW as well i.e. that 'The Welsh Government supports the role of Strategic Development Plans

identifying and establishing green belts to manage urban form and growth in MSWW'. As such the omission of such a policy would introduce confusion and a lack of clarity as to the appropriateness of having a Green Belt potentially designated for the MSWW, if there is an apparent unequal treatment in the NDF between Regions on this subject. It is considered more appropriate therefore to have a single Green Belt policy that applies to all 3 regions, which sets out the terms under which a GB should be designated in SDPs. It is noteworthy that Councils across Wales have not been given access to the range of evidence used by WG to identify the potential Green Belts that the NDF identifies for the North and SE Wales Regions.

The NDF places a significant emphasis on energy policy. Whilst this matter is a key area of policy, the scale of emphasis given to energy feels out of kilter with other priorities for the Country. Delivering a transformed transport system and addressing the major issues caused by a lack of inter-connectivity and the constraints to the network is, for example, just as (if not more) critical in terms of the requiring a national framework and yet there is no overarching policy on this in Section 4 of the NDF.

The NDF would benefit on an individual policy relating to strategic infrastructure investment – highlighting that in some circumstances development aspirations will require national intervention to unlock regeneration and meet the wider aspirations of the NDF and SDPs. This includes key, nationally significant transport infrastructure. Whilst the detail of any such schemes may not be known, certainly the principle can be embraced and made clear, with connections made to the relevant national strategies such as the National Transport Strategy, National Infrastructure Plan, etc. There must be recognition that, whilst collaboration with the private sector will always be pursued as far as is possible, the public sector will have a key role in unlocking investment, particularly financially unviable areas.

There is a lack of policy emphasising the importance of developing strategies/policy to facilitate tourism development (balanced against the landscape protection priorities) in the national and regional interests. The NDF has an important role to recognise and acknowledge the role and benefits that a vibrant domestic Tourism and the Visitor Economy brings to people, places and business in Wales.

More General observations:

- ***Housing Need Figures*** – clarification sought as to why these figures have not been extrapolated up to 2040 (i.e. the end of the NDF period). Currently, the figures appear to only relate to the period up to 2038.

- **Affordable Housing** – whilst the approach to affordable housing is supported, it should be recognised that there are significant issues surrounding viability. As such, targets/aspirations may not be achievable.
- **Energy Priority Areas (Wind and Solar Energy)** – concern that the cumulative effect of changes in regulations and the introduction of NDF policy appears to be that Welsh Government are largely taking control of renewable energy and are effectively imposing large scale wind and solar farm development across significant parts of Wales. The map is of such a scale and resolution that it is difficult to identify the areas in detail. Also, the ‘traffic light based approach’ embedded within the policy has not been transposed onto the map.
- **Spatial Direction** – although the draft NDF is described as a ‘spatial plan’, in reality there is limited or no spatial information for a number of topics areas. Whilst the NDF spatially covers topics such as growth areas, onshore wind and solar and district heat networks, other potentially spatial policies (e.g. Mobile Action Zones, biodiversity enhancement, national forests etc.) are not and appear to be set aside for a later date, stating that the WG ‘will identify’ areas/sites.
- **National Parks** – NDF lacks any policy direction / framework relating to National Parks.
- **Transportation** – NDF lacks any policy direction / framework relating to transportation / connections (particularly between identified regions).
- **Welsh Language** – NDF lacks any policy direction / framework relating to the Welsh Language.
- **Background Evidence (or lack of)** – there are a number of inconsistencies, inaccurate information and omissions throughout the supporting evidence. This is of significant concern, given that in certain instances these errors will undoubtedly have had an influence on the development of the policies and designations (e.g. the identification of the ‘Energy Priority Areas’). The shortcomings of the evidence base should therefore be addressed and where appropriate and relevant to do so, the NDF policy provisions should be amended accordingly.
- **Monitoring Framework** – the NDF lacks any form of Monitoring Framework, therefore a lack of clarity on how the WG will monitor the NDF moving forward.
- **SDP Preparation (Policy 16: Strategic Policies for Regional Planning)** – in order to facilitate the timely emergence of SDPs, the Welsh Government needs to limit the impact of the LDP ‘drop dead’ dates, whilst the first round of SDPs is put in place.

- ***Coherence / Cross-Referencing*** – NDF lacks any clear and transparent cross-referencing throughout. Whilst the outcomes are broadly supported, they are not articulated or linked to policies throughout the rest of the document. As a consequence, each outcome does not appear to have a clear direction or actions associated with it.
- ***Inconsistency of Detail*** – other than for renewable energy developments, there is a lack of detail and assessment on many other topics. Also, the use of terms 'should' and 'must' are used interchangeably throughout the document.