

From: [Jones Gareth \(AMG\)](#)
To: [NDE](#)
Subject: Planning Officers Society Wales (POSW): Response to NDF consultation
Date: 13 November 2019 14:01:01
Attachments: [POSW NDF consultation response 2019.pdf](#)

Dear Sir / Madam,

Please find attached the response on behalf of the Planning Officers Society Wales (POSW) to the consultation on the Draft National Development Framework.

I would be grateful if you could confirm that you have received this e-mail and the response.

Yours faithfully,

Gareth

Gareth Jones – Chair, Planning Officers Society Wales (POSW)

Pennaeth Adran Cynorthwyol / Assistant Head of Department

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Ffordd y Cob, Pwllheli, Gwynedd LL53 5AA





NDF Team, Planning Policy Branch,

Welsh Government, Cardiff

Dear Sir / Madam,

Thank you for the opportunity to respond to the consultation on the Draft National Development Framework.

Please find attached the formal response on behalf of the Planning Officers Society Wales (POSW), which represents all of the Local Planning Authorities in Wales.

POSW would be happy to discuss the issues we have raised in our response, and to work with you and your officers to facilitate an ambitious and fit for purpose National Development Framework, which responds to the challenges and opportunities facing Wales over the coming 20 years and beyond.

Thank you again.

Yours faithfully,



Gareth Jones, Chair of the Planning Officers Society Wales (POSW)

The Planning Officers Society Wales (POSW) response to the Draft National Development Framework (NDF) Consultation Document (November 2019)

1. NDF Outcomes (chapter 3)

The NDF needs to be realistic, as well as ambitious, if it is going to be a meaningful plan.

The outcomes' relationship with PPW's National Placemaking Outcomes, the Welsh Government's Well-being objectives and Wales' Well-being Goals is unclear. It may assist if, as per Planning Policy Wales Edition 10 (2018), there was a cross matrix in the appendix to the Plan clarifying the relationship? We consider the outcomes are mostly laudable aims but we question their deliverability, particularly when they are in part contradictory i.e. some promote growth, others protection of environmental resources.

The Development Plan system is predicated upon an evidence base that demonstrates the viability and deliverability of its proposals. There is no such evidence to support the NDF outcomes or to demonstrate they are deliverable. The NDF is setting outcomes that SDPs and LDPs will need to conform to and prove through examination that they are deliverable, based on robust evidence. This could lead to conflict in SDPs and LDPs that could seriously hamper development plan preparation and undermine the plan led system.

We are not convinced that the NDF Outcomes can be realistically achieved without additional resources being made available to deliver the individual priorities. Will Welsh Government be providing additional resources to Local Planning Authorities who are tasked with implementing the NDF through SDPs and LDPs?

As written the Outcomes seek economic development and increased affordable housing whilst reclaiming lost biodiversity and protecting greenfield land. The NDF is silent on how these conflicts are to be resolved and this is not helped by the lack of sufficient evidential analysis or information, the type of analysis that is required when producing other plans such as Local Development Plans.

Stating the Plan's objectives (as opposed to outcomes) is important in the context of the Habitat Regulations and Strategic Environmental assessment processes.

2. Spatial Strategy (policies 1 - 4)

The focus on sustainable travel in Policy 1 is welcomed, however the wording needs to be stronger to support car free development as a priority in appropriate locations.

Growth in existing settlements:

Policies 1, 2 and 3 seek to concentrate growth within urban centres, town and city centres, highlighting that large-scale public service facilities (such as universities and colleges, hospitals and public sector organisation buildings) should be located in town and city centres (Policy 2 refers). The NDF needs to clarify the definition of 'town and city centres' and 'large scale' public facilities.

It is unclear whether the NDF has been informed by any urban capacity studies to determine whether there are suitable sites available for such facilities within town/city centres across Wales. Is the focus on existing town/city centres and urban areas realistic and deliverable in the absence of urban capacity studies to support it. The number of vacant / available sites (particularly brownfield sites) within existing settlements is limited. Many of these sites have

been developed in recent years for housing and they are a finite resource. An over-reliance on growth within existing settlements could stifle growth within the “National Growth Areas” and undermine the delivery of the NDF and its outcomes.

Furthermore, development of large-scale public service facilities within town and city centres should not be at the exclusion of other suitable sites. It would be more appropriate to direct large-scale public service facilities to locations 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. Policy 2 as worded is currently too restrictive and would preclude very suitable sites not in town/city centres.

Furthermore, focussing development within existing urban settlements can result in town cramming and increased pressure and loss of open space, as well as significant further pressure on infrastructure like transport, schools, medical facilities etc. which is already a major concern for our communities and be contrary to well-being objectives.

The policy should acknowledge that development on the periphery of settlements can also deliver sustainable development, where there are current transport routes or the possibility of new routes being opened up. The acknowledgement that some development may need to take place on the edges of settlements and on greenfield land will ensure that the most sustainable options for accommodating growth can be pursued.

The planning system should deliver sustainable development in locations that represent the best compromise between the competing sustainability objectives and this is what the NDF should be stating rather than dictating where such developments should only be located.

The NDF’s support for the managed growth of coastal towns is noted, however the NDF should acknowledge and address the constraints to development which already exist in those settlements e.g. the risk of coastal flooding, or the lack of essential infrastructure both physical and digital.

New sustainable settlements

The NDF Strategy appears to dismiss the potential for sustainable new settlements. However, it is quite feasible that the most sustainable form of development could be a new settlement outside existing settlements rather than increasing development in settlements where infrastructure and quality of life are already challenged. This policy does not allow this form of development and as such could perpetuate less sustainable development.

Planning Policy Wales (PPW) sets out the exceptional circumstances where new settlements may be appropriate. The NDF should reflect the policy advice in PPW and recognise there may be a role for new settlements if they create more sustainable places than urban sprawl at the edge of existing settlements. Such matters should be given detailed consideration as part of SDP and LDP strategies. We feel the NDF has ignored the opportunity that new settlements could have in delivering sustainable places to meet the needs of our communities and future generations, and the NDF should make a positive statement about how such opportunities should be explored in the SDP and LDPs to follow.

Publicly owned land

Policy 3 emphasises the importance of publicly owned land in delivering development including for mixed use and affordable housing. Whilst this is welcomed in principle, it is considered that there is not a significant amount of Council owned land available for development, particularly in town and city centre locations.

Many Local Authorities are already identifying available land to deliver Affordable Housing, schools, infrastructure improvements and other corporate projects. However, Local Authorities also use the receipts from land disposal to deliver other strategic objectives such as the 21st Century schools programme. Welsh Government need to support Councils financially to deliver this agenda if land receipts are going to be reduced to support other policy initiatives.

Supporting rural communities

Policy 4 supports 'appropriate proportionate growth in rural towns and villages' but recognises this is best planned at regional and local levels. This is welcomed and should be based on evidence prepared at LDP level. However, Welsh Government should provide greater clarity on the role that the extensive rural areas, including AONBs and National Parks, should play in meeting the objectives of the NDF.

The spatial strategy would be strengthened through an explicit recognition of the role rural areas play within their respective communities and as a contributor to the future of rural Wales. 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. The role of the 'regional centres' is important, but these should not be the focus for growth at the expense of other rural settlements and communities. The reference to considering how jobs, services and homes in rural communities can help sustain themselves needs to include a realisation that many 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.

Comments on the Spatial Strategy Map

The following concerns about the spatial strategy map are raised:

Existing regional centres should be identified where they have an important functional role in providing a hub for employment and public services.

National Parks

The Spatial Strategy omits a clear framework for development within Wales' National Parks. Policy reflecting the distinct role of Wales' National Parks as nationally important cultural resources should be included. Such a policy could also helpfully address:

- The other benefits that National Parks provide e.g. ecosystem services, economic benefits, nature recovery etc;
- The s62 duty (Environment Act 1995) of certain bodies and persons to have 'regard' to the purposes for which National Parks are designated;
- The role of Unitary Authorities in providing evidence for National Park Authorities;
- The distinction that National Park Local Planning Authorities in Wales will soon be under a duty to pursue the Sustainable Management of Natural Resources;
- Major development in National Parks (including minerals development, waste). e.g. as referred to in para. 2.6.6 of the ISA "Focussing on existing towns and cities is an effective

means of directing the majority of new development away from distinctive and natural landscapes in the countryside as well as landscapes designations including National Parks and AONBs.”;

- The focus of housing delivery in national parks e.g. as provided for English National Parks and the Broads in the UK Government Vision and Circular 2010. (This would also accord with text in the ISA (page 163) “The regional planning detailed in Policy P16, would enable local planning authorities to help ensure that new development is located appropriately, away from distinct or sensitive landscapes with which it would discord, including Wales’s five highly sensitive AONBs and National Parks.”;
- The relationship of National Parks to Strategic Development Plans; and
- The importance of National Parks in developing resilient ecological networks.

Green Belt Issues

We have questions over the policies for Green Belts in North East and South East Wales. A green belt is a permanent protective designation that should look to protect an area from development for a period of at least 50 years. Designation of a greenbelt is a major long-term policy decision that should be based on robust evidence. Within a green belt, the only development permitted is essential accommodation for agricultural, forestry and rural enterprise workers, and essential outdoor recreation facilities.

In North Wales, LDPs have followed PPW in designating green wedges or the green barrier approach to manage urban form. The benefit of these is the flexibility they offer, compared to the degree of permanence that Green Belt designation confirms.

In South East Wales, one of the most prescriptive policies is Policy 30 - Green Belts in South East Wales. While the Policy itself requires the identification of green belts through a Strategic Development Plan to manage urban form and growth in South East Wales, the supporting text is considered to be very prescriptive, particularly given the apparent absence of detailed evidence and analysis to support this requirement.

Centres for Regional Growth

It is not clear why certain Centres have been identified as Centres for Regional Growth and not others, or what their role is in the South East region. In contrast, in the Mid and West Wales region, Policy 24 recognises the role of the Regional Centres identified there as the focus for managed growth. The NDF should take a consistent approach to this type of settlement across Wales and provide an evidence base to support the identification of the designated Centres.

3. Affordable Housing (policy 5)

Clarity needs to be provided in relation to the derivation of the housing projection figures and how these are intended to be used in SDPs and LDPs in the future.

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 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.

There is a real risk 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.

It is clear that more needs to be done to increase the supply of Affordable Housing, and Local Authorities are responding to this challenge with ambitious programmes of Council house building. However, there are concerns that across Wales the identified need for affordable housing is not close to being met. In addition, Welsh Government should clarify how it expects that the ambition of providing 51% of all homes as affordable within the next five years will be achieved.

Whilst Affordable Housing supply through public sector, RSL, Council housing and support for SME builders is a laudable ambition, the NDF appears to be somewhat dismissive of that the role the private sector, in particular volume house-builders, have in delivering Affordable Housing, which has been significant in the last 20 years.

We note the NDF includes lower levels of additional new homes for the regions. There needs to be a clearer explanation that the basis for the figures have changed, with the adoption of the new model. Otherwise objectors to housing will use the NDF as currently drafted to oppose much needed housing growth in Wales. The Welsh Government should be taking a braver stance on this issue in the NDF.

The required 47% of additional homes being affordable is very ambitious in this context and the reality is if enough affordable housing is to be provided, there needs to be more housing built overall.

The role of the private sector in delivering Affordable Housing will be largely influenced by market forces such as development viability, land/build costs, developer risk and return on investment which varies across Wales. In this regard, it is still important to allocate land where development viability is strong enough to support a strong policy requirement for increased levels of Affordable Housing and other necessary infrastructure. In areas with weaker market viability, or significant development cost, public sector intervention will be needed to help deliver sites and Welsh Government need to provide the necessary funding to support this.

There is a danger that Welsh Government's policies on housing will push volume house-builders out of Wales, as their representatives have suggested in various forums, and this would undermine our ability to meet housing need across a range and mix of house types and at the scale necessary to meet the NDF outcomes.

The NDF must have the same rigorous approach to deliverability as that required of Local Planning Authorities when preparing their Strategic and Local Development Plans, which must be in conformity with the NDF. This is particularly important to ensure that the NDF provides an effective framework for delivering enough affordable housing to meet the high level of need identified.

It should be recognised through the NDF, PPW and in subsequent SDPs and LDPs 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 type and tenures. It would be inappropriate to plan for large scale housing developments where the proportion of affordable housing 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 communities to be created. Welsh Government and Local Authorities will need to work with housing providers to

ensure this need can be met in a range of appropriate ways to deliver sustainable development.

4. Mobile Action Zones (policy 6)

The identification of mobile action zones is welcomed and will assist in the development and enhancement of telecommunications infrastructure across Wales.

5. Low Emission Vehicles (policy 7)

The NDF's attempt to encourage the roll-out of charging infrastructure for ultra-low emission vehicles is welcomed particularly to support rural areas where sustainable transport infrastructure is not always readily available. However, this needs to be supported by radical changes to sustainable transport infrastructure across Wales to tackle other transport issues like congestion.

6. Green Infrastructure (policies 8 & 9)

Policy 8: Biodiversity enhancement and ecosystem resilience

As worded, it appears NDF policy 8 is primarily focussed on safeguarding as yet undefined areas from development:

- Policy 8 does not of itself create the network but sets out a requirement for areas to be identified and for planning authorities to include them in their plans. (Our interpretation is that the emerging Area Statements process will be relied upon to identify such areas. However, it is unclear how far Area Statements process will introduce an element of prioritisation (as distinct from identifying all opportunities) and whether the Area Statements will be local, regional or national in terms of scale and significance;
- A cornerstone of a resilient ecological network is the protection and management of our most important biodiversity sites so that they achieve their conservation objectives. At this stage the effect of policy 8 in relation to Natura 2000 seems highly uncertain;
- The policy must identify national priorities for ecological networks and these must include nationally important biodiversity assets. These could be defined by criteria, for example, designated sites that do not have management in place to achieve their conservation objectives must each be national priority areas for action;
- The policy must also link more explicitly to Welsh Government's nature recovery action plan (NRAP) and a broader range of measures that might be achieved including action for priority species; and
- The policy must commit to a target for the contribution of development to nature recovery and the delivery of nature based solutions as is envisaged within the Natural Resources Policy (NRP).

Wording 'should' appears weaker than PPW's 'must' in requiring biodiversity net-benefit.

Policy could helpfully be provided on Resilient Ecological Networks.

Policy 9: National Forest

Policy 9 sets out Welsh Government's commitment to developing a 'National Forest' but does not explain how the delivery sites will be identified and mechanisms to achieve this aim. POSW are supportive of this initiative but would like more information from Welsh Government on how it will increase woodland cover in Wales by 2000 hectares/annum from 2020.

Such proposals should be planned for the long-term to protect our environmental assets now and for future generations in accordance with the WBFG Act. Further consideration should be given to the regulatory framework protecting trees as an environmental asset. They should be protected for their ecological value and not just amenity value.

Further information is required on the landscape and biodiversity implications in implementing this policy? Will this affect the character of affected areas such as settlements, or the National Parks?

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

Renewable technologies can play an important role in meeting the nation's energy needs, but the approach of the NDF on this matter and the promotion of Wind and Solar Priority Areas needs to be further refined. The NDF should reflect and acknowledge the impact that renewable energy development can have on sensitive landscapes (e.g. National Parks and AONBs) even when it is located outside those areas. Greater clarity and further refinement of the Priority Areas should be undertaken prior to the NDF being adopted as it is felt the Areas are too extensive.

The approach to planning for Renewable Energy development in the National Parks. i.e. a step further than Policy 12 - Wind and Solar Energy in National Parks (Snowdonia's approach, which has recently been found 'sound' at examination by the planning Inspectorate, did not consider it practical to undertake the detailed site surveys necessary to establish the spatial disposition of potential sites for future microgeneration and so the best option is to relying on a criteria based policy for renewable energy developments).

POSW welcomes clarification that not all of the area within the Priority Areas will be suitable for development of renewable energy. 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. Further evidence is also needed beyond the priority areas identified before detailed consideration can be given the suitability of the priority areas identified.

We would also welcome an understanding how the evidential work fits with the requirements of the current Technical Advice Note 8 and the Toolkit.

The NDF should clarify what new or reinforced grid infrastructure is needed to bring forward renewable developments within the Priority Areas identified.

The criteria for Policy 11 for determining DNS projects have been written solely for wind and solar energy. Other types of renewable energy which may be DNS e.g. energy from waste schemes are not covered sufficiently by the policy and may have different impacts that need to be addressed e.g. amenity, air pollution, transport implications. Linkages to LDP policies which provide a robust and comprehensive decision-making framework would strengthen this.

Welsh Government should clarify within the NDF the role that the nuclear industry should play in meeting the future energy demands of Wales and the extent to which facilities within North Wales will supply the nation. With Welsh Government having declared a climate emergency, the need for more low carbon energy has increased and the role that nuclear may play in meeting that need should be re-visited.

The NDF does not consider tidal or 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.

The NDF is unclear on the associated development and whether these developments will be safeguarded (by restricting grid connections to smaller scale renewable energy schemes until development in the priority areas is on-line).

8. The Regions (policy 16)

It is clear that the NDF delegates a significant amount of decision making to SDPs and this is welcomed in the most part, given that SDPs will have a more robust and detailed evidence base than is apparent with the NDF. However, we have raised concerns below regarding some of the more prescriptive policies in the NDF that we feel go too far given the lack of evidence to support them. We would alert Welsh Government to the possibility that unless these concerns are addressed the commitment to proceed with an SDP (in South East Wales) may be undermined.

Policy 16 Strategic Policies for Regional Planning refers to 'gypsy and traveller need'. It needs to be clear that the SDP will be looking specifically at transit sites and that permanent sites will be identified in LDPs and based on evidence of local need.

Transport Links between North and South Wales

With the acknowledgement of the distinctiveness of the regions, and their different opportunities and challenges, in order to achieve further more effective regional collaboration that will benefit Wales as a whole, it is considered appropriate to formulate a strategy for improving transport links between North and South Wales. Considering outcomes 1, 3, 5, and 7, developing a strategy for improving transport links between North and South Wales could achieve:

- for our cities, towns and villages to be well connected;
- will build stronger links between public services, communities and business;
- as cities and large towns are magnets for jobs and investment, improving transport links between the three regions will create a fairer distribution of wealth and prosperity, as well as addressing the issues of declining communities due to outward migration for economic purposes; and,
- an opportunity for new sustainable transport structure.

Whilst the NDF acknowledges that strategic North - South transport links are a constraint on growth, it does not make proposals in relation to how and when these should be improved. This should be addressed in the final version 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, 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.

13. Habitats Regulations Assessment

The HRA avoids consideration of in combination impacts arising from the Wales Infrastructure Investment Plan “because there are no specific details pertaining to the nature of the potential developments within the NDF”. The NDF directs development and growth to spatial locations. Whilst it is perhaps not possible to consider the in-combination impact of the plans, it is possible to consider the in-combination impact between the NDF (as a plan) and the projects contained within the Wales Infrastructure Investment Plan Project Pipeline. The wording therefore under ‘Projects’ on page 18 of the HRA appears to obfuscate the Welsh Government’s duty as ‘Competent Authority’ to assess the in-combination impact.

14. Welsh Language

Although the Spatial Strategy refers to the number of Welsh speakers in each region, there is no framework or strategy discussing the impact of large scale change / nationally important development on the Welsh language, nor how large scale change will have a role in increasing the number of Welsh speakers. Outcome 4 does state that development will be managed to ensure there are jobs and homes to enable the language to remain central to those communities’ identities, however there is no clarification/elaboration within the spatial strategy policies on how to manage development to safeguard or enhance the Welsh language.

The NDF should provide greater clarity on how the Welsh language will be protected, strengthened and developed.

We also suggest that the NDF clarifies the role of plans at all levels, in contributing to the target of achieving a million Welsh speakers by 2050.

15. Further comments

Evidence

The NDF should be more explicit in where the evidence to support its policies and strategy can be found. We question the evidence and assumptions that have informed the NDF and whether the focus on existing town/city centres and urban areas is realistic and deliverable in the absence of urban capacity studies to support it. An over-reliance on growth within existing settlements could stifle growth within the “National Growth Areas” and undermine the delivery of the NDF and its outcomes.

In the context of the Planning (Wales) Act 2015, Section 2 (2), it is unclear how the issue of ‘Need’ (in particular housing) is to be addressed by the NDF as it is not prescriptive on how the need it asserts is to be met. Will the application of the conformity test (with regard to lower tier plans) lead to apportionment?

Weight of the NDF

Welsh Government should provide immediate clarity on what weight should be placed on the emerging NDF prior to its adoption for Local Planning Authorities in their development management decisions and policy making.

The NDF should acknowledge and reflect the influence of the emerging Regional Economic Strategies and ensure that both documents are complimentary and consistent with each other.

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 as drafted does not include a number of significant elements that require a national lead in order for lower tier plans to provide the detail as follows:

- **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 provides 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.
- **Offshore wind generation** or the potential for **Tidal Lagoons** to generate significant levels of renewable energy have not been recognised in the NDF. 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.
- The NDF needs to clarify the **role of ports** in Wales. They are shown on the spatial strategy diagram and regional plans but there is no policy or explanation as to their current and future roles.
- Environmental issues like **air quality** and **flood risk** are given very little acknowledgement and consideration throughout the NDF.
- The role of **tourism** at a more national scale could be recognised alongside the potential impacts on local communities. There are sometimes mixed messages in terms of the capacity of locations to cope with additional tourism development.

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.

Monitoring

The NDF should include a monitoring framework in the same way as LDPs to assess its effectiveness and delivery against its objectives. At this stage this would provide an opportunity to consider how realistic or achievable some of the NDF's policies and proposals are.

The Overall the significant omissions from the NDF and the failure of the NDF to provide a national spatial strategy for development in Wales undermines its credibility and raises significant concerns over whether the document is fit for its purpose.