

From: [Mead, Craig](#)
To: [NDE](#)
Subject: Torfaen County Borough Council Response
Date: 15 November 2019 17:05:24
Attachments: [Final Torfaen County Borough Council NDF Response.docx](#)
[Final Torfaen Council draft NDF WG response form.doc](#)

Dear Sir/Madam

Please find attached the consultation response from Torfaen County Borough Council. The response has been submitted on the provided consultation template but given the format of the template and which forces some important issues from a Torfaen County Borough perspective into the other comments section which in view of the Council reduces the importance of some of the Council's comments and therefore, I have also attached a Torfaen specific response which the Council would request is also considered and thus forms part of the Council's response.

Please can you confirm receipt and acceptance of the attached 2 consultation responses?

Kind regards

Craig

Craig Mead

Senior Planner – Planning Policy & Implementation / Uwch Gynllunyydd - Cynllunio a Gweithredu
Polisiâu

Neighbourhoods, Planning & Public Protection / Cymdogaethau, Cynllunio A Diogelu'r Cyhoedd
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Consultation Response Form

Your name	Craig Mead
Your address	Torfaen County Borough Council Ty Blaen Torfaen Panteg Way New Inn Pontypool NP4 0LS
Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	Torfaen County Borough 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Page 18 NDF Outcomes – The Council assumes that the 11 listed Outcomes are not in a prioritised order and all have equal status?

Page 18 Objective 2 – why are residents of rural areas in Wales entitled to access to homes, jobs and services but residents in Wales's urban areas are not?

Page 20 – Why are the outcomes listed on page 20 and 21 written in greater detail and using different terminology to page 18?

Page 20 Outcome 5 – '*Cities and large towns are magnets for jobs and investment*'

Yet Cwmbran as the 8th largest settlement in Wales is not being identified as a magnet for job and investment as it is not being identified as a Centre of Regional Growth in the South East Wales Region (within which Cwmbran is the 4th largest settlement).

The Valleys Task Force has identified 6 strategic hubs (large towns) within South East Wales, with Cwmbran identified as being one of them. Strategic Hubs have been identified as areas which are most accessible within 45 minutes to people living within Valley communities by public transport. The focus on growing urban areas is to create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. The NDF should have greater synergy with other Welsh Government Policies and Programmes, which should be reflected in any overarching higher tier planning policy framework for Wales.

Page 20 Outcome 5 – *‘A Wales where people live and work in towns and cities which are a focus and springboard for sustainable growth’.*

Whilst the 11 NDF Outcomes and the overarching ambitions are broadly supported, Outcome 5 states that it will create a Wales where people live *‘and work in towns and cities which are a focus and springboard for sustainable growth’*. Whilst the Council would not disagree with this sentiment and if this is an overarching ambition for the NDF, then in the Council’s view the NDF should go further and identify Cwmbran, on the concept map for South East Wales in addition to the other 4 centres identified as being ‘Centres of Regional Growth’ Bridgend, Merthyr Tydfil, Pontypridd and Caerphilly.

Page 20 Outcome 6 – Development plans and in particular LDP’s are instrumental in bringing forward economic development. What must be recognised by Welsh Government is that development plans are essentially interventions in the market to bring about positive change and cover a 15 year period.

If Welsh Government are serious about achieving this outcome there needs to be recognition that planning is an intervention in the market, viability can vary considerably throughout a 15 year period therefore there should be sensible approach with regards to viability and the need to demonstrate viability at the outset of plan preparation. For instance in lower viability areas, public intervention is likely to be required to bring about regeneration or to support private sector investment. Funding streams might not be available at the outset of plan preparation but they are likely to come on board throughout a 15 year cycle covering a plan period. This can easily be demonstrated by current adopted development plans that are due to expire in 2021, none of which make reference to current funding streams including City Deal, Valleys Taskforce, Shared Prosperity Fund etc. We must continue to plan for lower viability areas where change is more difficult to achieve.

Page 21 Outcome 7 – *‘All methods of travel will need to have low environmental impact and low emissions, with ultra-low emission vehicles and public transport replacing today’s petrol and diesel vehicles’.*

Whilst the Council are fully supportive of this outcome this strengthens the need for the NDF to recognise Valleys Taskforce Strategic Hubs that have been identified as areas which are most accessible within 45 minutes to people living within Valley communities by public transport. This needs to be coupled by investment in infrastructure that supports multimodal transport interchanges in order to increase the use and accessibility of public transport.

In addition in order to support this requirement there will be a need to increase the frequency of trains on the Marches Line stopping at both Cwmbran and New Inn/Pontypool Stations.

Page 21 Outcomes 9 and 10 – It is considered that these Outcomes are weak and unlike the other stated outcomes these are statements and do not suggest the need for action.

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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	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Page 22 paragraph 1 – NDF identifies that the Spatial Strategy will be set which sets the structure for the type and location of development. It will highlight key settlements in which development will be focused and the infrastructure, transport, actions and resources required.

Yet Cwmbran has not been identified as a key settlement and as a result through the NDF and subsequent Strategic Development Plan (SDP), which will need to be in conformity with the NDF, will mean that Cwmbran will not be a focus for development up until 2040. The Council request that Cwmbran is identified as a Centre of Regional Growth.

Page 22 paragraph 5– NDF identifies that '*co-locating homes, jobs and services means focusing on cities and large towns as the main development areas*'.

Yet Cwmbran has not been identified as a centre for regional growth despite being the 8th largest settlement in Wales (and 4th largest in South East Wales). Cwmbran's very development as a New Town was on the basis of co-locating of homes, jobs and services

Page 24 paragraph 4 - The NDF identifies a range of important regional centres

which through specific policies in Strategic and Local Development Plans, should retain and enhance the commercial and public service base that make them focal points in their areas.

The spatial strategy empowers local policy and decision-makers to develop the national priorities through Strategic and Local Development Plans and identify areas and issues of significance to their particular areas.

It is the Council's view that Cwmbran is a significant sub-regional centre, it is the fourth largest settlement in South East Wales, the Town has one of the largest shopping centres after Cardiff which attracts circa 15 m visitors a year, the Town has been a focus for development since its designation as a New Town 1949 and is a hotspot for a number of employment sectors over and above Caerphilly, Merthyr Tydfil and Pontypridd and despite these factors it has been omitted from the Draft NDF both in the text and key diagrams. The inclusion of Cwmbran would strengthen local policy and decision making as it would relate directly to the aspirations of a higher tier plan.

Page 26 – the Council welcomes and supports the focus on existing towns and cities in order to grow, renew and regenerate them. Cwmbran was developed on sustainable principles (before sustainability was recognised) with the provision of homes, jobs, local services and green space in close proximity and should be identified as a Centre of Regional Growth in the NDF in order to continue this development.

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 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 approach the delivery of affordable housing?

Page 30 - The provision of affordable homes should become a key focus for housing delivery. It is estimated under the central estimate that on average 47% of additional homes should be affordable housing

The Council supports the aspirations of Welsh Government to increase affordable homes, but the target should be realistic, underpinned by evidence and based on viability. The target of 47% is unrealistic. The viability of a scheme will vary on a site by site basis and will change over the lifetime of a plan in line with changes in economic circumstances. Setting such a high affordable housing target will have a massive impact on the margins of viability and will adversely impact on lower viability areas where it is difficult to encourage development in the first instance.

There are other mechanisms to securing affordable housing which would not result in an undeliverable policy requiring 47% affordable housing delivery on sites which would impact on viability and thus delivery. These mechanisms include the identification of 100% affordable housing sites in lower tier plans or delivery of these sites as windfall sites (Torfaen County Borough Council have been very successful in this regard) and through funding mechanisms.

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

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

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?

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

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?

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"/>

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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?

Page 37 – Renewable Energy – no reference is made to World Heritage Sites in relation to the traffic light diagram

P42 – District Heat Networks – little detail is provided on this requirement. No background evidence base seems to be provided on why locations have been chosen? How would they be delivered? Does this relate to new developments? Is there a size threshold?

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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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.

Chapter 5 The Regions – Council have concerns about how the information in this chapter will relate to the subsequent SDP.

The NDF regions chapter will set the framework for the preparation of the SDP for South East Wales. Yet there does not seem to be any evidence base to support what is being proposed and whether what is being proposed is best for South East Wales or if the proposed strategy is actually deliverable i.e. can Newport accommodate the proposed focus for growth? Is the land available and free from constraints? What impact does the decision not to take forward the M4 Relief Road mean on what is being proposed? There is a lack of current Metro investment in Cwmbran and the Marches Railway Line in order to provide links to Newport, although there is a stated intention to increase capacity to every 15 minutes.

Yet the statement on page 11 of the NDF states that the NDF does not seek to take decision most appropriately taken at a regional/local level. But by identifying Centres of Regional Growth it does take away the ability of the SDP for South East Wales to take decisions about the best strategy to serve South East Wales.

The Regional Chapter of the NDF does more than set out the policies and key issues for South East Wales it sets a framework/strategy for the development of the Region by identifying Centres of Regional Growth.

How can a location not identified as a Centre of Regional Growth prescribe development and a growth strategy, in order to resolve issues raised in its LDP Review, when the NDF does not direct development to this location and without consultation with the local community?

Page 46 Policy 16 Strategic Policies for Regional Planning – The Council supports this policy in terms of what should be undertaken as part of the preparation of the SDP for a region but given the details and information provided by the NDF Regional Chapter for South East Wales how can the SDP (which must be in accordance with the NDF) prepare a spatial strategy (as the NDF does this), a settlement hierarchy (as the NDF has already identified Centres of Regional Growth) and identify spatial areas for strategic housing and employment growth when the NDF has already set the strategy and direction of growth in South East Wales up to 2040?

Page 61 - The key diagram on 'Road Connectivity' states "Road connectivity is good east west along the Heads of the Valleys"

In the Council's view this should be amended to reflect that south east Wales has good connectivity in the north along the A465 Heads of the Valleys Road as well as in the south along the M4 corridor but improvements required to cross Valleys connectivity.

Page 62 Focus for Growth – The NDF Strategy for South East Wales identifies that growth should be focus in Cardiff, Newport and the Valleys yet the eastern most of the South Wales Valleys, Torfaen is not recognised, as growth is directed to Newport. This ignores the fact that Cwmbran acts as a focus for the rest of Torfaen, surrounding areas including parts of Monmouthshire, parts of Newport, parts of Blaenau Gwent and eastern parts of Caerphilly. The geography of South East Wales should also be taken into account and the impact on accessibility should be considered. Cwmbran is strategically located on the A4042T for access to Abergavenny/Heads of the Valleys Trunk Road and the M4 and cross valley links are provided by the A472 which links into the A4042T at Pontypool., whilst is also located on the Marches Railway Line.

Page 62 paragraph 5 - *'Employment centre, strategic housing growth and services should focus on the most sustainable and accessible locations and seek to address congestion, reduce car based commuting and improve air quality'*

In the Council's view if Welsh Government are committed to achieving this objective, ALL 'centres of regional growth' within South East Wales should be identified. The concept diagram on page 63 identifies Bridgend, Merthyr Tydfil, Pontypridd and Caerphilly but omits Cwmbran – the largest of the sub regional centres.

Page 63 – Torfaen County Borough Council disagrees with Cwmbran not being identified as a Centre of Regional Growth for the following reasons: -

- Cwmbran is the 8th largest settlement in Wales and the 4th largest in South East Wales. Therefore, there is a contradiction in the NDF which states that growth should be focused on Wales's largest towns and cities yet Cwmbran has not been identified as a Regional Growth Centre;
- Cwmbran has been a focus for growth in housing and employment since its designation as a New Town in 1949;
- As a New Town Cwmbran suffers from specific problems to other towns in

Wales. These include the need for upgrading buildings & infrastructure constructed by the Development Corporation, simultaneous aging of the older housing & industrial stock constructed by the Development Corporation. Making Cwmbran a focus for public and private investment and development could help to address these issues;

- Cwmbran is home to Gwent Police's HQ (and Gwent Police's new HQ is under construction in Cwmbran) and the currently under construction Grange University Hospital (£350 m on investment by Welsh Government) will serve Gwent and South Powys. As part of the locational considerations of the GUH, Aneurin Bevan University Health Board undertook a travel time study which identified that Cwmbran was the most central location in Gwent;
- Cwmbran Town Centre contains almost 1m sq ft of floorspace and annual attracts circa 15 m visitors. The Town Centre operates as a sub-regional centre and attracts visitors from Caerphilly, Blaenau Gwent, Monmouthshire and Newport,
- Cwmbran is strategically located on the A4042T for links to Abergavenny & Heads of the Valleys Trunk Road and cross Valley via the A472. In addition Cwmbran has direct access to the M4 via junction 25A (5 miles via the A4042T) which avoids the Brynglas Tunnels. Also the Marches Railway line provides links to Newport, Hereford and Manchester/Crewe;
- Cwmbran has recently been identified as a Strategic Hub through the Welsh Government's Valleys Task Force with the NDF outlining that the identified Regional Centres for Growth are Valleys Task Force Hubs yet Cwmbran despite being a hub is not being promoted as a Regional Centre for Growth whilst other Valleys Taskforce Hubs are being promoted;
- TCBC previously argued at the Public Inquiry for the A4042 for Cwmbran to be provided by room to grow by ensuring that the route of the A4042 was not constructed directly adjacent to the built form of the Town however, the route chosen was directly adjacent to the built form of the Town. In addition Cwmbran was never developed to the previously envisaged 55,000 target population as identified in the 1962 Urban Development Corporation Expansion Masterplan and therefore, the Town was designed to accommodate a larger population than the current circa 50,000 population;
- There is a current lack of employment land within Torfaen to accommodate larger requirements (as evidenced by various employment enquiries). Investment is required to assist with the delivery of some of the potential sites so that Cwmbran can fulfil its role and meet the requirements of firms and its residents;
- The Growth & Competitiveness Commission set up as part of the City Deal published the findings of their investigation in December 2016. They identified that as a consequence of the Deal being agreed and economic changes that there will also need to be an increase in house building across the region to attract a younger population and skilled workers one of the areas for growth

they identified included Cwmbran;

- Cwmbran is a focus for a number of employment sectors alongside other identified NDF Regional Growth Centres e.g. Bridgend. These sectors include general manufacturing (also high tech manufacturing jobs), science & tech jobs and Business Admin/ICT & Professional/Scientific & Tech Services;
- The house building rate in Torfaen has increased significantly over the last 3 years (with further growth forecast in the Joint Housing Land Availability Study (JHLAS)) with the majority of house growth located in Cwmbran. Last year the house building rate in Torfaen at 382 (with the JHLAS forecast for 1,936 dwellings over the next 3 years) was significantly higher than Caerphilly, Merthyr (40 dwellings 2019 JHLAS with only 2055 dwellings allocated in replacement LDP up to 2031) and Rhondda Cynon Taff (all of which have been identified as Regional Growth Centres in the NDF);
- The NDF will set the context for the forthcoming Strategic Development Plan (SDP) which means that the lack of the identification of Cwmbran as a Regional Growth Centre could stymie the proposals for the future of Cwmbran as the strategy for the SDP has already been set by the NDF;
- Cwmbran, because of its strategic location within South East Wales, would ensure that housing delivery is viable and can address problems of lack of affordable housing delivery and accommodate the additional extra costs of zero carbon, placemaking and green infrastructure going forward. Cwmbran is a location where people want to live, house builders are happy to build and where employers want to be located.

Page 64 Policy 28 Newport – The Council recognises Newport being a Centre of National Growth given its proximity between Cardiff and Bristol but the Council are concerned about the evidence base to support the amount of growth to be directed to Newport at the expense of a fair share of growth for Cwmbran. The impact of the decision to not proceed with the M4 Relief Road does not seem to have been factored into the strategy for South East Wales. Newport has a number of environmental constraints to the south and east which would impinge on an expansion in these directions. In addition the identification of a green belt to the north of Newport/M4 would also preclude development in this direction and no consideration is given to the relationship/proximity between Cardiff and Newport in the West. Therefore, it is difficult to understand how this focus can be delivered and that consideration should be given to Cwmbran having an expanded role and being identified as a Regional Centre for Growth should be considered. The NDF should be supported by a robust and credible evidence base.

By focusing growth in Newport it will result in significant changes to the local transport network e.g. between Newport and Torfaen. Therefore, consideration should be given to transport infrastructure and public transport provision not only within Newport but also neighbouring authorities.

Page 66 Policy 29 The Heads of the Valleys - The Welsh Government supports co-ordinated regeneration and investment in the Heads of the Valleys area to

increase prosperity and to address social inequalities.

Whilst the Council would support this policy in principle, if Welsh Government is committed to this principle then it needs to allow sufficient flexibility in lower tier plans to allocate sites in low viability areas and to plan for regeneration. Many of the sites within the Heads of the Valleys are in low viability areas and are unlikely to be realised without public intervention. Planning is an intervention in the market and if Welsh Government are serious about achieving shared prosperity, the NDF needs to acknowledge this.

Page 66 Policy 30 – Green Belts - The Welsh Government requires the identification of green belts through a SDP to manage urban form and growth in South East Wales, particularly around Newport and the eastern part of the region.

In the Council's view greater consideration needs to be given to this policy. On one hand the NDF advocates the growth of Newport, having not undertaken an environmental capacity assessment and then proposes to restrict the location of growth. There is insufficient evidence to support such a policy at this time.

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?

No comments

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?

No comments

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.

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?

Page 6 paragraph 1 – identifies that the NDF is to set the direction for development in Wales over the next 20 years. In addition in the document '*Prosperity for Wales: The National Strategy*' the NDF is highlighted as having an import role in delivering sustainable growth and combating climate change and guiding strategic development over the next 20 years.

However, as the NDF provides the vision for change over the next 20 years, it needs to more accurately reflect an analysis of how sub regional centres relate to City Centres and their surrounding settlements. In terms of Cwmbran (as a sub-regional centre) it out performs all other sub-regional centres within the region. The significance of Cwmbran should be recognised and identified as a Centre of Regional Growth.

Guiding development and encouraging sustainable growth is central to combating climate change, alongside the aim of providing employment opportunities locally to reduce commuting. Given that Cwmbran provides a significant proportion of employment locally, the Council would raise the issue concern with an over-emphasis on Newport in the NDF.

All plans, at any level, should be based on a robust and credible evidence base. Although the NDF, as a high level plan, it should still be supported by a robust evidence base and the Council are concerned that no evidence has been provided to support the proposal that Newport is able to accommodate the significant levels of growth being proposed in terms of environmental and infrastructure capacity.

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The intent of the above 3 statements is not accurately reflected in the NDF: -

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Page 12 A Living Landscape - ‘We have a number of World Heritage Sites’

As a point of clarification, Wales has 3 World Heritage Sites, two in north Wales and one in South Wales. This statement seriously underplays the significance of World Heritage Sites as they are not only regionally significant designations but globally significant. They also act as a driver for stimulating Tourism and the Foundational Economy, an important strand of Welsh Government Policy

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This is important to Torfaen for both sustainable transport and climate change reasons. All current and future transportation schemes will consider these aspects and support will be provided to all partners in relation to these advancements where it is practicable to do so.

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Whilst the Council supports the sentiment of these statements, there is a need to more accurately reflect all Welsh Government programmes to ensure that this translates in to practice.

Page 25 The Spatial Strategy Diagram – this identifies the entirety of CCR South East Wales as a national growth area.

The Council welcomes the fact that South East Wales has been identified as a national growth area and are fully supportive of this aspiration.

Page 27 paragraph 4 - Town Centres *'are increasingly becoming places to live and work, centres of community and cultural activity, and the focus for public services such as health and education'*.

Supporting town centres as a focus for economic activity is welcomed.

Page 28 Policy 3 – We will work with all public land owners and investors to ensure that development of a significant scale is located in town and city centres which are accessible by walking, cycling and public transport.

Supporting town centres as a focus for economic activity is welcomed.

Page 31 paragraph 1 – Welsh Government Indicate that in order to address the housing deliver gap they will *'support small and medium sized construction and building enterprises to build more homes'*.

Supporting the foundational economy through SMEs to deliver on housing needs is supported.

Page 33 Policy 8 – Strategic framework for biodiversity enhancement and ecosystem resilience

The Council is supportive and agrees with this proposed Policy.

Page 35 Policy 9 – National Forest - The Forest will be a national asset which could provide jobs in timber, leisure.

Recognition of the role that this policy plays in supporting the foundational economy and sustainable construction is welcomed.

Page 69 Policy 33 – Valleys Regional Park

The Council is supportive and agrees with the Policy.

16. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

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	<input type="checkbox"/>
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Draft Torfaen County Borough Council National Development Framework Response

Summary of Response

It is the Council's view that the NDF is flawed in not identifying Cwmbran as a Centre for Regional Growth and that the Town should be identified as such a Centre. The reasons for this include; Cwmbran being the 4th largest settlement in South East Wales; Cwmbran is well located in relation to highway links via A4042, M4 and A472; Cwmbran Town Centre is one of the largest shopping centres in Wales; Cwmbran is a hotspot for a number of employment sectors and thus pressure for further employment development and the recent decision by Welsh Government to invest circa £350 m in the construction of the new Grange University Hospital should be a catalyst for further investment and growth which would be secured by Cwmbran being identified as a Regional Centre for Growth. In addition, as a consequence of the Town's development as a New Town it faces a number of problems and challenges which are specific to Cwmbran, within Wales, and becoming a focus for growth and investment will help to address these issues.

Torfaen County Borough Council Comments

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wider regions. It will ensure we take action to meet the needs of those struggling to access housing and that the places we create make us happier and healthier’.

Whilst the Council supports the sentiment of these statements, there is a need to more accurately reflect all Welsh Government programmes to ensure that this translates in to practice.

Page 18 NDF Outcomes – The Council assumes that the 11 listed Outcomes are not in a prioritised order and all have equal status?

Page 18 Objective 2 – why are residents of rural areas in Wales entitled to access to homes, jobs and services but residents in Wales’s urban areas are not?

Page 20 – Why are the outcomes listed on page 20 and 21 written in greater detail and using different terminology to page 18?

Page 20 Outcome 5 – *‘Cities and large towns are magnets for jobs and investment’*

Yet Cwmbran as the 8th largest settlement in Wales is not being identified as a magnet for job and investment as it is not being identified as a Centre of Regional Growth in the South East Wales Region (within which Cwmbran is the 4th largest settlement).

The Valleys Task Force has identified 6 strategic hubs (large towns) within South East Wales, with Cwmbran identified as being one of them. Strategic Hubs have been identified as areas which are most accessible within 45 minutes to people living within Valley communities by public transport. The focus on growing urban areas is to create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. The NDF should have greater synergy with other Welsh Government Policies and Programmes, which should be reflected in any overarching higher tier planning policy framework for Wales.

Page 20 Outcome 5 – *‘A Wales where people live and work in towns and cities which are a focus and springboard for sustainable growth’.*

Whilst the 11 NDF Outcomes and the overarching ambitions are broadly supported, Outcome 5 states that it will create a Wales where people live *‘and work in towns and cities which are a focus and springboard for sustainable growth’*. Whilst the Council would not disagree with this sentiment and if this is an overarching ambition for the NDF, then in the Council’s view the NDF should go further and identify Cwmbran, on the concept map for South East Wales in addition to the other 4 centres identified as being ‘Centres of Regional Growth’ Bridgend, Merthyr Tydfil, Pontypridd and Caerphilly.

Page 20 Outcome 6 – Development plans and in particular LDP’s are instrumental in bringing forward economic development. What must be recognised by Welsh Government is that development plans are essentially interventions in the market to bring about positive change and cover a 15 year period.

If Welsh Government are serious about achieving this outcome there needs to be recognition that planning is an intervention in the market, viability can vary considerably throughout a 15 year period therefore there should be sensible approach with regards to viability and the need to demonstrate viability at the outset of plan preparation. For instance in lower viability areas, public intervention is likely to be required to bring about regeneration or to support private sector investment. Funding streams might not be available at the outset of plan preparation but they are likely to come on board throughout a 15 year cycle covering a plan period. This can easily be demonstrated by current adopted development plans that are due to expire in 2021, none of which make reference to current funding streams including City Deal, Valleys Taskforce, Shared Prosperity Fund etc. We must continue to plan for lower viability areas where change is more difficult to achieve.

Page 21 Outcome 7 – *‘All methods of travel will need to have low environmental impact and low emissions, with ultra-low emission vehicles and public transport replacing today’s petrol and diesel vehicles’.*

Whilst the Council are fully supportive of this outcome this strengthens the need for the NDF to recognise Valleys Taskforce Strategic Hubs that have been identified as areas which are most accessible within 45 minutes to people living within Valley communities by public transport. This needs to be coupled by investment in infrastructure that supports multimodal transport interchanges in order to increase the use and accessibility of public transport.

In addition in order to support this requirement there will be a need to increase the frequency of trains on the Marches Line stopping at both Cwmbran and New Inn/Pontypool Stations.

Page 21 Outcomes 9 and 10 – It is considered that these Outcomes are weak and unlike the other stated outcomes these are statements and do not suggest the need for action.

Page 22 paragraph 1 – NDF identifies that the Spatial Strategy will be set which sets the structure for the type and location of development. It will highlight key settlements in which development will be focused and the infrastructure, transport, actions and resources required.

Yet Cwmbran has not been identified as a key settlement and as a result through the NDF and subsequent Strategic Development Plan (SDP), which will need to be in conformity with the NDF, will mean that Cwmbran will not be a focus for development up until 2040. The Council request that Cwmbran is identified as a Centre of Regional Growth.

Page 22 paragraph 5– NDF identifies that *‘co-locating homes, jobs and services means focusing on cities and large towns as the main development areas’.*

Yet Cwmbran has not been identified as a centre for regional growth despite being the 8th largest settlement in Wales (and 4th largest in South East Wales). Cwmbran’s very development as a New Town was on the basis of co-locating of homes, jobs and services

Page 24 paragraph 4 - The NDF identifies a range of important regional centres which through specific policies in Strategic and Local Development Plans, should retain and enhance the commercial and public service base that make them focal points in their areas.

The spatial strategy empowers local policy and decision-makers to develop the national priorities through Strategic and Local Development Plans and identify areas and issues of significance to their particular areas.

It is the Council's view that Cwmbran is a significant sub-regional centre, it is the fourth largest settlement in South East Wales, the Town has one of the largest shopping centres after Cardiff which attracts circa 15 m visitors a year, the Town has been a focus for development since its designation as a New Town 1949 and is a hotspot for a number of employment sectors over and above Caerphilly, Merthyr Tydfil and Pontypridd and despite these factors it has been omitted from the Draft NDF both in the text and key diagrams. The inclusion of Cwmbran would strengthen local policy and decision making as it would relate directly to the aspirations of a higher tier plan.

Page 26 – the Council welcomes and supports the focus on existing towns and cities in order to grow, renew and regenerate them. Cwmbran was developed on sustainable principles (before sustainability was recognised) with the provision of homes, jobs, local services and green space in close proximity and should be identified as a Centre of Regional Growth in the NDF in order to continue this development.

Page 30 - The provision of affordable homes should become a key focus for housing delivery. It is estimated under the central estimate that on average 47% of additional homes should be affordable housing

The Council supports the aspirations of Welsh Government to increase affordable homes, but the target should be realistic, underpinned by evidence and based on viability. The target of 47% is unrealistic. The viability of a scheme will vary on a site by site basis and will change over the lifetime of a plan in line with changes in economic circumstances. Setting such a high affordable housing target will have a massive impact on the margins of viability and will adversely impact on lower viability areas where it is difficult to encourage development in the first instance.

There are other mechanisms to securing affordable housing which would not result in an undeliverable policy requiring 47% affordable housing delivery on sites which would impact on viability and thus delivery. These mechanisms include the identification of 100% affordable housing sites in lower tier plans or delivery of these sites as windfall sites (Torfaen County Borough Council have been very successful in this regard) and through funding mechanisms.

Page 37 – Renewable Energy – no reference is made to World Heritage Sites in relation to the traffic light diagram

P42 – District Heat Networks – little detail is provided on this requirement. No background evidence base seems to be provided on why locations have been chosen? How would they be delivered? Does this relate to new developments? Is there a size threshold?

Chapter 5 The Regions – Council have concerns about how the information in this chapter will relate to the subsequent SDP.

The NDF regions chapter will set the framework for the preparation of the SDP for South East Wales. Yet there does not seem to be any evidence base to support what is being proposed and whether what is being proposed is best for South East Wales or if the proposed strategy is actually deliverable i.e. can Newport accommodate the proposed focus for growth? Is the land available and free from constraints? What impact does the decision not to take forward the M4 Relief Road mean on what is being proposed? There is a lack of current Metro investment in Cwmbran and the Marches Railway Line in order to provide links to Newport, although there is a stated intention to increase capacity to every 15 minutes.

Yet the statement on page 11 of the NDF states that the NDF does not seek to take decision most appropriately taken at a regional/local level. But by identifying Centres of Regional Growth it does take away the ability of the SDP for South East Wales to take decisions about the best strategy to serve South East Wales.

The Regional Chapter of the NDF does more than set out the policies and key issues for South East Wales it sets a framework/strategy for the development of the Region by identifying Centres of Regional Growth.

How can a location not identified as a Centre of Regional Growth prescribe development and a growth strategy, in order to resolve issues raised in its LDP Review, when the NDF does not direct development to this location and without consultation with the local community?

Page 46 Policy 16 Strategic Policies for Regional Planning – The Council supports this policy in terms of what should be undertaken as part of the preparation of the SDP for a region but given the details and information provided by the NDF Regional Chapter for South East Wales how can the SDP (which must be in accordance with the NDF) prepare a spatial strategy (as the NDF does this), a settlement hierarchy (as the NDF has already identified Centres of Regional Growth) and identify spatial areas for strategic housing and employment growth when the NDF has already set the strategy and direction of growth in South East Wales up to 2040?

Page 61 - The key diagram on 'Road Connectivity' states "Road connectivity is good east west along the Heads of the Valleys"

In the Council's view this should be amended to reflect that south east Wales has good connectivity in the north along the A465 Heads of the Valleys Road as well as in the south along the M4 corridor but improvements required to cross Valleys connectivity.

Page 62 Focus for Growth – The NDF Strategy for South East Wales identifies that growth should be focus in Cardiff, Newport and the Valleys yet the eastern most of the South Wales Valleys, Torfaen is not recognised, as growth is directed to Newport. This ignores the fact that Cwmbran acts as a focus for the rest of Torfaen, surrounding areas including parts of Monmouthshire, parts of Newport, parts of Blaenau Gwent and eastern parts of Caerphilly. The geography of South East Wales should also be taken into account and the impact on accessibility should be considered. Cwmbran is strategically located on the A4042T for access to Abergavenny/Heads of the Valleys Trunk Road and the M4 and cross valley links are provided by the A472 which links into the A4042T at Pontypool., whilst is also located on the Marches Railway Line.

Page 62 paragraph 5 - *‘Employment centre, strategic housing growth and services should focus on the most sustainable and accessible locations and seek to address congestion, reduce car based commuting and improve air quality’*

In the Council’s view if Welsh Government are committed to achieving this objective, ALL ‘centres of regional growth’ within South East Wales should be identified. The concept diagram on page 63 identifies Bridgend, Merthyr Tydfil, Pontypridd and Caerphilly but omits Cwmbran – the largest of the sub regional centres.

Page 63 – Torfaen County Borough Council disagrees with Cwmbran not being identified as a Centre of Regional Growth for the following reasons: -

- Cwmbran is the 8th largest settlement in Wales and the 4th largest in South East Wales. Therefore, there is a contradiction in the NDF which states that growth should be focused on Wales’s largest towns and cities yet Cwmbran has not been identified as a Regional Growth Centre;
- Cwmbran has been a focus for growth in housing and employment since its designation as a New Town in 1949;
- As a New Town Cwmbran suffers from specific problems to other towns in Wales. These include the need for upgrading buildings & infrastructure constructed by the Development Corporation, simultaneous aging of the older housing & industrial stock constructed by the Development Corporation. Making Cwmbran a focus for public and private investment and development could help to address these issues;
- Cwmbran is home to Gwent Police’s HQ (and Gwent Police’s new HQ is under construction in Cwmbran) and the currently under construction Grange University Hospital (£350 m on investment by Welsh Government) will serve Gwent and South Powys. As part of the locational considerations of the GUH, Aneurin Bevan University Health Board undertook a travel time study which identified that Cwmbran was the most central location in Gwent;
- Cwmbran Town Centre contains almost 1m sq ft of floorspace and annual attracts circa 15 m visitors. The Town Centre operates as a sub-regional centre and attracts visitors from Caerphilly, Blaenau Gwent, Monmouthshire and Newport,

- Cwmbran is strategically located on the A4042T for links to Abergavenny & Heads of the Valleys Trunk Road and cross Valley via the A472. In addition Cwmbran has direct access to the M4 via junction 25A (5 miles via the A4042T) which avoids the Brynglas Tunnels. Also the Marches Railway line provides links to Newport, Hereford and Manchester/Crewe;
- Cwmbran has recently been identified as a Strategic Hub through the Welsh Government's Valleys Task Force with the NDF outlining that the identified Regional Centres for Growth are Valleys Task Force Hubs yet Cwmbran despite being a hub is not being promoted as a Regional Centre for Growth whilst other Valleys Taskforce Hubs are being promoted;
- TCBC previously argued at the Public Inquiry for the A4042 for Cwmbran to be provided by room to grow by ensuring that the route of the A4042 was not constructed directly adjacent to the built form of the Town however, the route chosen was directly adjacent to the built form of the Town. In addition Cwmbran was never developed to the previously envisaged 55,000 target population as identified in the 1962 Urban Development Corporation Expansion Masterplan and therefore, the Town was designed to accommodate a larger population than the current circa 50,000 population;
- There is a current lack of employment land within Torfaen to accommodate larger requirements (as evidenced by various employment enquiries). Investment is required to assist with the delivery of some of the potential sites so that Cwmbran can fulfil its role and meet the requirements of firms and its residents;
- The Growth & Competitiveness Commission set up as part of the City Deal published the findings of their investigation in December 2016. They identified that as a consequence of the Deal being agreed and economic changes that there will also need to be an increase in house building across the region to attract a younger population and skilled workers one of the areas for growth they identified included Cwmbran;
- Cwmbran is a focus for a number of employment sectors alongside other identified NDF Regional Growth Centres e.g. Bridgend. These sectors include general manufacturing (also high tech manufacturing jobs), science & tech jobs and Business Admin/ICT & Professional/Scientific & Tech Services;
- The house building rate in Torfaen has increased significantly over the last 3 years (with further growth forecast in the Joint Housing Land Availability Study (JHLAS)) with the majority of house growth located in Cwmbran. Last year the house building rate in Torfaen at 382 (with the JHLAS forecast for 1,936 dwellings over the next 3 years) was significantly higher than Caerphilly, Merthyr (40 dwellings 2019 JHLAS with only 2055 dwellings allocated in replacement LDP up to 2031) and Rhondda Cynon Taff (all of which have been identified as Regional Growth Centres in the NDF);
- The NDF will set the context for the forthcoming Strategic Development Plan (SDP) which means that the lack of the identification of Cwmbran as a

Regional Growth Centre could stymie the proposals for the future of Cwmbran as the strategy for the SDP has already been set by the NDF;

- Cwmbran, because of its strategic location within South East Wales, would ensure that housing delivery is viable and can address problems of lack of affordable housing delivery and accommodate the additional extra costs of zero carbon, placemaking and green infrastructure going forward. Cwmbran is a location where people want to live, house builders are happy to build and where employers want to be located.

Page 64 Policy 28 Newport – The Council recognises Newport being a Centre of National Growth given its proximity between Cardiff and Bristol but the Council are concerned about the evidence base to support the amount of growth to be directed to Newport at the expense of a fair share of growth for Cwmbran. The impact of the decision to not proceed with the M4 Relief Road does not seem to have been factored into the strategy for South East Wales. Newport has a number of environmental constraints to the south and east which would impinge on an expansion in these directions. In addition the identification of a green belt to the north of Newport/M4 would also preclude development in this direction and no consideration is given to the relationship/proximity between Cardiff and Newport in the West. Therefore, it is difficult to understand how this focus can be delivered and that consideration should be given to Cwmbran having an expanded role and being identified as a Regional Centre for Growth should be considered. The NDF should be supported by a robust and credible evidence base.

By focusing growth in Newport it will result in significant changes to the local transport network e.g. between Newport and Torfaen. Therefore, consideration should be given to transport infrastructure and public transport provision not only within Newport but also neighbouring authorities.

Page 66 Policy 29 The Heads of the Valleys - The Welsh Government supports co-ordinated regeneration and investment in the Heads of the Valleys area to increase prosperity and to address social inequalities.

Whilst the Council would support this policy in principle, if Welsh Government is committed to this principle then it needs to allow sufficient flexibility in lower tier plans to allocate sites in low viability areas and to plan for regeneration. Many of the sites within the Heads of the Valleys are in low viability areas and are unlikely to be realised without public intervention. Planning is an intervention in the market and if Welsh Government are serious about achieving shared prosperity, the NDF needs to acknowledge this.

Page 66 Policy 30 – Green Belts - The Welsh Government requires the identification of green belts through a SDP to manage urban form and growth in South East Wales, particularly around Newport and the eastern part of the region.

In the Council's view greater consideration needs to be given to this policy. On one hand the NDF advocates the growth of Newport, having not undertaken an environmental capacity assessment and then proposes to restrict the location of growth. There is insufficient evidence to support such a policy at this time.

Other comments

Page 25 The Spatial Strategy Diagram – this identifies the entirety of CCR South East Wales as a national growth area.

The Council welcomes the fact that South East Wales has been identified as a national growth area and are fully supportive of this aspiration.

Page 27 paragraph 4 - Town Centres *'are increasingly becoming places to live and work, centres of community and cultural activity, and the focus for public services such as health and education'*.

Supporting town centres as a focus for economic activity is welcomed.

Page 28 Policy 3 – We will work with all public land owners and investors to ensure that development of a significant scale is located in town and city centres which are accessible by walking, cycling and public transport.

Supporting town centres as a focus for economic activity is welcomed.

Page 31 paragraph 1 – Welsh Government Indicate that in order to address the housing deliver gap they will *'support small and medium sized construction and building enterprises to build more homes'*.

Supporting the foundational economy through SMEs to deliver on housing needs is supported.

Page 33 Policy 8 – Strategic framework for biodiversity enhancement and ecosystem resilience

The Council is supportive and agrees with this proposed Policy.

Page 35 Policy 9 – National Forest - The Forest will be a national asset which could provide jobs in timber, leisure.

Recognition of the role that this policy plays in supporting the foundational economy and sustainable construction is welcomed.

Page 69 Policy 33 – Valleys Regional Park

The Council is supportive and agrees with the Policy.