

From: [Cilia, Jaci](#)
To: [Correspondence mail - JJ](#)
Cc: [NDE](#)
Subject: NATIONAL DEVELOPMENT FRAMEWORK RESPONSE
Date: 15 November 2019 14:06:48
Attachments: [Xerox Scan_15112019135345.pdf](#)

Dear Minister

Please find attached letter from Councillor Neil Moore, Leader, The Vale of Glamorgan Council and Theme Lead for Planning on Cardiff Capital Region Cabinet for your attention.

Yours sincerely

Jaci Cilia

Business Manager / Cynorthwydd Personol

Managing Director and Resources / Gwasanaethau Perfformiad a Datblygu

Vale of Glamorgan Council / Cyngor Bro Morgannwg

tel / ffôn [REDACTED]

mob / sym: [REDACTED]

e-mail / e-bost: [REDACTED]

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Date/Dyddiad: 15 November 2019

Ask for/Gofynwch am: Cllr Neil Moore

Telephone/Rhif ffon: [REDACTED]

Your Ref/Eich Cyf:

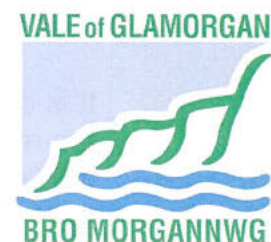
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The Vale of Glamorgan Council
Civic Offices, Holton Road, Barry. CF634RU
Tel: (01446) 700111

Cyngor Bro Morgannwg
Swyddfeydd Dinesig, Heol Holton, Y Barri. CF634RU
Ffôn: (01446) 700111

www.valeofglamorgan.gov.uk



Julie James AM
Minister for Housing and Local Government
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

By email to: Correspondence.Julie.James@gov.wales and ndf@gov.wales

Dear Minister

DRAFT NATIONAL DEVELOPMENT FRAMEWORK

I write to you on behalf of the Local Authorities within the Cardiff Capital Region, as the Portfolio Holder for Planning to provide a specific response to the Draft National Development Framework (NDF), having regard to how its policies and proposals affect the Cardiff Capital Region. Whilst you will, no doubt, receive individual comments from Local Authorities about how the NDF affects their local area, the comments below reflect the collective view of the representatives of the 10 Local Authorities in Cardiff Capital Region and demonstrate where there is agreement about how the policies and proposals in the NDF affect this region.

In summary, we have some key concerns with the Draft NDF, as follows:

- The lack of evidence and research to demonstrate that the NDF objectives, policies and proposals are appropriate and deliverable;
- The pre-determination of land-use planning matters best dealt with at regional and local plan stage e.g. growth capacity of existing settlements, role of new settlements, and green belt proposals; and
- Key omissions of the NDF, with one example being the lack of any such solution to the issue of M4 congestion.

As you are aware, the Cardiff Capital Region (CCR) Cabinet has already signed up to the principle of an SDP for the Cardiff Capital Region and we hope to submit a proposal for an SDP in South East Wales to you in due course. However, it is noted that recent announcements regarding Corporate Joint Committees may change the framework in which the SDP will operate, potentially unpicking some of the work the region has already undertaken under the current regulatory framework. The region hopes to work with the Welsh Government to ensure our time and effort to date is not wasted and we can move forward together to deliver an SDP that is fit for purpose.

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It is clear that the NDF delegates a significant amount of decision making to the regional plan and this is welcomed in the most part, given that the SDP 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 may be undermined. The NDF must have the same evidence-based 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.

SDP Boundary:

In terms of the boundary for the SDP, the CCR Cabinet consider the most appropriate boundary is the 10 Local Planning Authority areas in the South East Wales region, thus excluding the areas of the Brecon Beacons National Park (BBNP) Authority area. The NDF states that LPAs should determine the geographical footprints of the SDP, however, the map of the South East region includes the BBNP areas and this could cause some confusion. The NDF should therefore be explicit under Policy 16 that the SDP need not include the whole region.

Contradictory NDF Outcomes:

We consider the Draft NDF outcomes are mostly laudable aims but we question their deliverability, particularly when they are in part contradictory. For example Outcomes 2, 3, 5, 6, and 8 would support growth whilst Outcomes 9, 10 and 11 seek to protect and enhance natural resources and the environment. A conflicting set of objectives cannot deliver sustainable development. The NDF needs to be realistic as well as ambitious if it is going to be a meaningful plan.

Deliverability of the National Growth Strategy:

Policies 1, 2 and 3 seek to concentrate growth within towns and cities. Whilst this is welcomed in principle, it is unclear whether the NDF has been informed by any urban capacity studies to determine whether there are suitable sites available and whether this is realistic and deliverable. Furthermore, focussing development within existing urban settlements as a simple strategy can result in town cramming 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.

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 in the South East region for development, particularly in town centre locations.

The NDF should acknowledge that development on the periphery of settlements can also deliver sustainable development, especially 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, especially where aligned with infrastructure improvements like the Metro.

Potential for new sustainable settlements

The NDF Strategy appears to dismiss the potential for sustainable new settlements (page 22 refers). 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. The NDF should make a positive statement about how such opportunities should be explored in the SDP and LDPs to follow.

Housing:

The Estimates of Housing Need should only form part of the evidence base for housing targets in development plans. The target of 47% affordable housing or the overall affordable housing need identified might not be deliverable, desirable nor appropriate. The NDF targets could underplay the influence of initiatives like the City Deal which aims to deliver more housing in the region through a new Housing Investment Fund aimed at increasing housing supply and meeting a range of other objectives.

The NDF states that “71,200 additional new homes are needed in the region until 2038”. This figure is not particularly aspirational considering the current adopted LDPs in the region have a housing requirement in excess of 110,000. The required 48% of additional homes in the region being affordable is very ambitious in this context and the reality is if we’re going to provide enough affordable housing we need to build more housing overall. Objectors to housing will use the NDF as currently drafted to oppose much needed housing growth in the region. The Welsh Government should be taking a braver stance on this issue in the NDF.

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. In the South East region the private sector has been responsible for delivering a significant number of affordable homes through section 106 agreements on market-led developments.

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 in locations where developers want to build and 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.

It should be recognised through the NDF, that in order to make quality places with cohesive communities where people want to live, new housing developments need to deliver a mix of house type and tenures.

Transport:

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.

References to known transport infrastructure improvements such as the Metro improvements are lacking in the NDF. The map symbol on page 63 is unclear and the Metro improvements should be shown spatially to demonstrate where they might have greatest impact within growth areas.

The draft NDF notes that 'Welsh Government will maintain its commitment to tackling congestion on the M4'. This is reassuring to hear, but swift action is required and the situation cannot be allowed to continue indefinitely. It is understood that Welsh Government are considering alternative options and progress will be made shortly. Any commitments to new routes/sustainable travel alternatives should be covered in the NDF.

No reference is made to the contribution that the A465 Heads of the Valleys Road can have in delivering national and regional development. The Valleys Taskforce has set out aspiration and proposals for the Heads of the Valleys area and key to delivering these is maximising the benefits of the investment that has been made by Welsh Government on this national artery. It is surprising that the NDF does not include specific policies on maximising the benefits of the improvements within the area served by this route.

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. Freight is also a major contributor to the problems at Brynglas Tunnels and delays to freight movements are one of the main costs to the Welsh economy and should be addressed in the NDF.

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.

Issues with the NDF proposals for South East Wales:

Policy 27 on Cardiff is welcomed insofar as it recognises the Capital City's role as the primary national centre. However, the National Development Framework, as currently drafted, significantly underplays the major opportunity Cardiff's population and economic growth represents for Wales, placing a disproportionate emphasis on the challenges associated with growth. We consider that the Framework should support Cardiff's population and economic growth, and the unique role the city economy plays in the national economy, whilst ensuring that the benefits of this growth are felt across the wider Capital Region.

In terms of Policy 28, we welcome the recognition of the strategic importance of Newport within the South East Wales region. However, it should be noted that significant parts of Newport are constrained (e.g. flood zones, transport constraints, air quality). Therefore, if Newport is expected to accommodate additional growth as set out in the draft NDF, we will need to work in partnership with Welsh Government to improve the infrastructure in and around Newport so the city is properly equipped to become a centre of national growth.

Policy 29 supports regeneration and investment in the Heads of the Valleys area and this is welcomed. However, there is a lack of detail on how prosperity is to be increased and social equalities addressed. Furthermore, the Heads of the Valleys area should be shown spatially on the plan at page 63.

The focus on Cardiff, Newport and the Heads of the Valleys has left important areas in the region outside the NDF's consideration. In terms of the NDF's approach to the South East Wales region, we are disappointed that some parts of the region have been ignored (i.e. the Vale of Glamorgan, Bridgend and Cwmbran) or deliberately restricted (i.e. Monmouthshire and Blaenau Gwent) without robust evidence to support this approach and considerations of the implications for this. The NDF therefore fails to recognise the growth potential of these places and pre-determines stagnation versus growth. Decisions about the spatial strategy for the region should be taken at a regional and local level, as recognised at various points in the NDF.

It is unclear how the strategy for the region has been informed by urban capacity studies and development viability appraisals. We question how deliverable this strategy is, and whether local planning authorities will be able to prepare SDPs and LDPs that conform with the NDF whilst demonstrating deliverability through their independent Examination.

Green Belt:

One of the most prescriptive policies in the Draft NDF 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, it refers particularly to Newport and the eastern region. The supporting text goes further to state: “The Strategic Development Plan must identify a green belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff” and the illustrative diagram on page 63 shows a clear indication of the location of that green belt. This text and map is considered to be too prescriptive, particularly given the apparent absence of detailed evidence and analysis to support this requirement. If it were proposed as part of an SDP or LDP in this way it would not meet the tests of soundness without robust evidence to support it.

The green belt policy would appear to be overly restrictive in the eastern part of the region (i.e. Monmouthshire) where sustainable growth should be welcomed to manage social issues such as population decline and to address inequalities in terms of access to affordable housing for younger people. Furthermore, this part of the region needs to respond to the effects of migration resulting from the impact of the removal of the Severn Bridge tolls particularly the economic opportunities associated with this – there is a significant opportunity for Monmouthshire to capitalise on economic links to the South West region and its strategic location between the Great Western Cities of Cardiff, Newport and Bristol, and to address the social sustainability of the County’s demography.

A greenbelt 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 greenbelt, the only development permitted is essential accommodation for agricultural, forestry and rural enterprise workers, and essential outdoor recreation facilities. Restricting growth in this part of the region in such a prescriptive way through the NDF undermines the Cardiff Capital Region City Deal which includes a growth strategy for the whole region and would act to hinder growth in an area of significant demand and potential. It also undermines the role of the SDP and pre-determines the growth strategy to follow which needs to be supported by robust evidence.

Furthermore, there may be other parts of the region where a green belt may be justified. While the draft NDF does not outwardly dismiss the designation of a green belt elsewhere in the region, the exclusion of such a designation in the NDF when a green belt to the north of the M4 from the Severn Crossings to North Cardiff is explicitly required in the NDF, could predetermine any future consideration on this matter at a regional or local level.

Policy 30 should be reworded to simply state that the SDP must consider the evidence for a green belt in the region.

Concluding Remarks:

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

In summary, the NDF is a missed opportunity.

Yours sincerely



Councillor Neil Moore

**Leader, Vale of Glamorgan Council and Theme Lead for Planning on
Cardiff Capital Region Cabinet**

cc ndf@gov.wales