

From: [REDACTED]
To: [NDE](#)
Subject: Pentyrch Community Council : response to draft NDF consultation
Date: 13 November 2019 11:14:32
Attachments: [Pentyrch Community Council response to dNDF 13.11.19.pdf](#)

Please find attached PCC's response to the draft NDF consultation.

Many thanks,

Helena Fox

Clerk to Pentyrch Community Council

Tel: [REDACTED]

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PENTYRCH COMMUNITY COUNCIL



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BY EMAIL

NDF Team
Planning Policy Branch
Welsh Government
Cathays Park
Cardiff CF10 3NQ

November 13 2019

Dear Sirs,

DRAFT NATIONAL DEVELOPMENT FRAMEWORK FOR WALES

Pentyrch Community Council is a member of the North West Cardiff Group and supports the NWCG's submission.

2. General comments:

2.1 We **do not** agree that the 11 Outcomes set out on page 18 are sufficient for a Development Plan. Policies need to be made more specific with clear spatial boundaries for example for the Metro, proposed Growth Areas and Green Belts. Without this the Spatial and Regional Strategies can't give a clear indication of what is likely to happen, where, and when over the next 20 years. We trust that this consultation will give Welsh Government (WG) the opportunity to revise the draft National Development Framework (dNDF) so that it makes a significant difference to outcomes by setting a new direction for sustainable growth.

2.2 We **do** agree that is vital to avoid further sprawling greenfield development (page 22). However this is what is being created in North West Cardiff. WG should provide the lead in avoiding sprawl in future by supporting more effective forward planning and investment in all forms of infrastructure, as well as the release of more brownfield sites in private - as well as public - ownership. This would help tackle climate change and improve the well-being of current and future generations. The NDF presents an opportunity for more effective spatial integration of planning, transport and other infrastructure and environmental planning at national level which should encourage better planning at local level instead of the current "developer-led" planning. We urge WG to review the dNDF with this in mind so that its first NDF sets a more sustainable direction for the future than the consultation draft.

2.3 Page 24 refers 'empowering local decision-makers', however we are concerned that developers can re-negotiate planning consents and S106 agreements without these being referred to Planning Committee, even though some changes can impact on housing densities and local facilities. While we realise that speed of decision-making is important, advertising these changes for a short period would give the opportunity for the community to comment. Timeliness is important, but should not be at the expense of informed decision-making.

3. Comments on specific policies:

3.1 Policy 5: We support provision of affordable rented Council and Housing Association homes as the main means of tackling housing need. Whilst private renting has a role to play, we are concerned that privately built 'affordable' housing is being sold to companies or individuals and then rented at market prices. Upward-only rent reviews mean that rental costs increase rapidly. We urge WG to encourage building of high-quality energy-efficient Council homes such as the 105 built at Goldsmith Street Norwich, a scheme which won the 2019 RIBA Stirling Prize.

3.2 Policies 10-15: We support policies to encourage wind and solar energy and District Heating Networks (DHN) in appropriate locations. We suggest that WG policy should favour DHN - rather than simply require its consideration - in developments of over 100 new homes in the urban areas identified. We support a thorough examination of the potential for hydropower throughout Wales.

4. Strategy for South-East Wales (pages 61-69):

4.1 The Group is very supportive of the proposal for a Green Belt to the north of Cardiff necessary to help shape the future form of the urban area on both sides of Caerphilly Mountain. However, we are concerned at the overlap with an Area of Growth - we can't see how one area can have both designations. We supported the policy for a Green Belt in Cardiff's LDP but were very disappointed when it was deleted - at the behest of Welsh Government. As well as a Green Belt covering the whole of Caerphilly Mountain up to the northern edge of the M4, the Green Belt needs to extend around North West Cardiff and West Cardiff and include specifically the Special Landscape Area comprising Garth Hill and Ridges, to ensure that Cardiff doesn't "bleed" into the rural Vale of Glamorgan beyond the A4232 link road to the M4, and to ensure retention of our best quality agricultural land vital for the security of our future food supplies. Related to this we are concerned that the dNDF does not include protection of family owned and/or tenanted farms which are vital for food security, protection of language and cultural identity as well as a bastion against large scale factory farming. This is a notable omission as facilities related to the latter are usually subject to planning control. Whilst our comments relate to South East Wales, we suggest that the implications for the proposed Green Belt for North Wales be considered in the light of this comment.

4.2 We note that Welsh Government has recently declared a Climate Emergency. Unfortunately, decisions made just before that mean that development is being built in advance of transport infrastructure as a result of Welsh Government representations on Cardiff's Local Development Plan (LDP) leading, just as we predicted, to ribbon development along Llantrisant Road and the misery of piecemeal road widening. We argued for a tram-train system to be built through North West Cardiff at the LDP Public Inquiry, only to be told that the housing could go ahead on the basis of extended "express" bus services leaving a green corridor potentially to be used for public transport in future. Anyone who has endured peak hour traffic knows what a joke that future aspiration is turning out to be, with buses stuck at the back of long queues of cars. The bus lane alongside the current BBC Wales offices simply leads to bunches of buses travelling in convoy via the bottleneck of Llandaff village, through an Air Quality Management Area! This leads to unevenly spaced bus services (with diesel buses) providing little incentive to car owners to leave their vehicles at home. The final NDF needs to reflect the opportunity provided by creation of Transport for Wales within WG to secure better strategic planning and operation of public transport in Wales in advance of development at national, regional and local levels.

Yours sincerely,

Helena Fox
Clerk to PCC