

**From:** [Amanda J. Phillips](#)  
**To:** [NDE](#)  
**Cc:** [REDACTED]  
**Subject:** Draft NDF consultation response  
**Date:** 15 November 2019 10:37:43  
**Attachments:** [image002.png](#)  
[image004.jpg](#)  
[SWW Regional Response to consultation on NDF.pdf](#)

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Good morning

Please find attached a response to the National Development Framework from the South West Wales Regional Transport Group.

You will note from the response that several of the questions remain unanswered as the response is focused on transport related issues. Each of the 4 Local Authorities represented will also submit individual responses covering the remaining questions.

Kind regards

Amanda

**Amanda Phillips**

Programme and Commissioning Manager / Rheolwr Rhaglen a Chomisiynu

**Neath Port Talbot County Borough Council / Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot**

[REDACTED]  
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We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni

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If you would like to use Welsh when dealing with the Council please click [here](#)

Os hoffech ddefnyddio'r Gymraeg wrth ddelio â'r Cyngor os gwelwch yn dda cliciwch [yma](#)

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## **Consultation Response Form**

Your name	<b>David Griffiths</b>
Your address	<b>The Quays, Brunel Way, Baglan Energy Park, Neath SA11 2GG</b>
Preferred contact details (email/phone/post)	<b>[REDACTED]</b>
<u>Organisation (if applicable)</u>	<b>Chair of South West Wales Regional Transport Group.</b> Consisting of Carmarthenshire County Council, Neath Port Talbot County Borough Council, Pembrokeshire County Council and City and County of Swansea.

## 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?

[illegible]

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

[illegible]

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

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

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

### 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 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?

### 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 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 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 enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

The Policy sets out a generally useful statement of intent, in terms of working in partnership to achieve the aim, however it clearly lacks detail and potential actions. To a large extent this is understandable given the technology is developing so rapidly, in relative terms.

Given the positive contribution that Electric Vehicles are expected to be able to make to the decarbonisation agenda, it would be good to see the NDF being more specifically integrated with the Environmental (Wales) Act 2016 and the Wellbeing of Future Generations (Wales) Act (2015).

<https://futuregenerations.wales/work/decarbonisation/>

Whilst Hydrogen fuelled vehicles are in an earlier phase of development and emergence when compared with electric vehicles, this is a fuel technology which may benefit from a specific mention. One of the greatest barriers to uptake of hydrogen powered vehicles is sourcing reliable refilling stations. Is this something which the National Development Framework could provide support for given the prospect of hydrogen fuelled vehicles having a greater potential range and shorter refilling cycle than that of electric?

## 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?

[illegible]

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

## 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 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.





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

There is no objection in principle to the concept of defining a sub region of Wales as Mid and South West Wales (MSWW).

There needs to be clear recognition within the NDF however that this Region does include Authorities with significantly contrasting geographical areas and character, and that the Region covers a vast area that poses a huge challenge in terms of describing the Region as any sort of cohesive entity. For example, unlike the other Regions, much of the MSWW Region does not have the degree of interconnectedness of other regions and is not a viable commuter area into the main growth areas that will drive future economic uplift and significant new job opportunities.

The issue of combining the Mid & South West areas into a single region was similarly commented upon in the recent Welsh Government 'Improving Public Transport' White Paper Consultation (March 2019). The four Councils in South West Wales have a long history of joint working, and share a greater variety of cross-border working and movement in contrast to that with the Mid-Wales authorities. Mid-Wales authorities have previously shared in this same consultation a complementary view, that their predominant development needs and patterns differ from that of South West Wales. A four region approach is therefore preferred.

An option which would split South West and Mid Wales into separate areas would not only support the distinctive characters of these geographical areas, but would also better align with the aims and programmes of the Swansea Bay City Deal.



The following points are made in relation to the specific policies:

Policies 23 – 26 (4 in total) relate to the MSWW Region

The MSWW Region Diagram (pg 57) is generally clear, but this is somewhat at the expense of showing much information at all regarding nationally significant issues/proposals for this vast area of Wales. It omits elements that are in the national schematic map (page 25) for no obvious reason.

The map would benefit from showing the Areas of Outstanding National Beauty and National Parks.

The MSWW Region Diagram shows no clear aspiration for enhanced connectivity between the south and north of the MSWW region.

Throughout the report the Metro has been named the Swansea Bay Metro. It is intended that the Metro will provide increased services and improved connectivity for the whole of the South West Wales region, while also improving connectivity with services outside the region. It is therefore suggested that the name of the Metro be amended throughout the report to South West Wales Metro.

Policy 26:

Policy 26 is clearly very high level and is no more than highlighting a commitment of government to work with agencies (does that include private sector?) to plan the Metro and to support growth that would capitalise on its delivery. The policy clearly needs to be more descriptive in terms of the scheme and the specific opportunity that it presents, and to give some description of the options available to deliver what would be a massive investment on a scale beyond anything seen for many decades.

The exact form and content of the Metro continues to develop, but is expected to be an integrated bus and rail system, which promotes onward active travel opportunities from its key hubs.

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

The draft final preliminary rail report for the region has been completed as of September 2019. This work could provide some of the illustrations for NDF context (see attached). The bus concepts are however still being worked up and are unlikely to be publicly available until Q3 2020.

The South West Wales region welcomes its inclusion within the NDF in order to provide a solid policy footing for the project, and to establish its inclusion within the policy cascade down to the Local Transport Plan refresh expected in the coming years.

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

The final paragraphs set out under Policy 26 do not relate to the Metro and appear out of place in this location. The content of the paragraphs could form part of the rationale for the requested additional policy on National Parks/AONB/Natural Resources.

## **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.

## **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?

## **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?

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.

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**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?

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**16. Are you...?**

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

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