

From: [Jones, Owen](#)
To: [NDF](#)
Subject: Rhondda Cynon Taf CBC - Response to the Draft NDF
Date: 13 November 2019 10:52:17
Attachments: [image001.png](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.png](#)
[image005.jpg](#)
[image006.jpg](#)
[Rhondda Cynon Taf NDF Response.doc](#)

Good morning,
Please see attached the Rhondda Cynon Taf CBC response to your consultation on the Draft NDF,
Cofion - Regards,

Owen Jones

Rheolwr Gwasanaethau Datblygu (Polisi Cynllunio) – Development Services Manager (Planning Policy).

Ffyniant a Datblygiad | Prosperity and Development

Cyngor Bwrdeistref Sirol Rhondda Cynon Taf County Borough Council

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If you are attending a meeting, please let the organiser know if you would like to contribute to the meeting in Welsh and/or if you'd like to receive a Welsh language reception service during your visit.



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We welcome correspondence in Welsh and corresponding with us in Welsh will not lead to a delay. Let us know your language choice if Welsh or bilingual

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Consultation Response Form

Your name	Simon Gale
Your address	Rhondda Cynon Taf County Borough Council Floor 2 Sardis House Sardis Road Pontypridd
Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	Rhondda Cynon Taf 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 type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Although the outcomes are generally supported, delivering all 11 solely through the planning system will be challenging. There are many competing outcomes such as protection of the environment and biodiversity with the need to build more affordable homes. Whilst it is understood that a balanced approach needs to be adopted with the right development in the right place, nevertheless local planning authorities face many competing objectives which Welsh Government require to be met. It is questioned as to what the priority should be given to.

Whilst the principle of being carbon free is supported it needs to be recognised that this will be much more challenging in some areas such as those that lack public transport or where there is a predominance of old and inefficient housing stock.

None of the proposed 11 outcomes refer to managing flood risk in Wales. The NDF recognises that climate change is the greatest threat to development in Wales, however flooding and managing its impacts is not included within the framework. A key word search within the draft NDF found only 9 uses of the word 'flood'. This very light reference to flooding and flood management does not draw enough consideration to how flood risk will limit development opportunities across Wales.

Flooding is one of the greatest natural hazard risks in Wales and the risk of flooding is only expected to increase as a result of climate change. Current climate models (from a medium emissions scenario) project an increase in winter rainfall by 14% and a rise of sea levels around Wales by approximately 22cm by 2050. Not only will storm frequencies increase, but we can expect stronger winds and heavier rainfall

events in the future. It is essential that consideration is given to this increased risk when considering regional development across Wales over the next 20 years.

We must have a framework that gives direction and guidance to how Wales' future development can adapt to the impacts of climate change, especially adapting to increased flood risk. There must be greater attention drawn to how future development across Wales can ensure long-term sustainability and resilience against flood risk from all sources, including coastal, fluvial and pluvial sources that effect all 3 regions in Wales.

It should also be noted that the NDF does not refer to, or identify the requirement for Sustainable Drainage Systems (SuDS) and SuDS Approval Body (SAB) under Schedule 3 of the Flood and Water Management Act 2010. More comprehensive master planning involving sustainable drainage will be required for all new developments in Wales to tackle the challenges of climate change, and should therefore be included within the NDF.

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

Policy 1- Whilst the premise of focusing development around existing urban areas is understood and supported, it should be made clearer that a sequential approach to development under this policy is sought. Land within the town and city centres should be considered first then extending out into the urban settlements and lastly suitable locations on the edge of them. This is what it is assumed that the policy means, although it is not as clear as in Policy 2. If this is not the case then it is questioned how this is possible as there is very little land left centrally in urban areas. It is inevitable that land outside these boundaries will include greenfield land if that it sequentially preferable, to enable the necessary growth in development identified in this Plan.

It is considered that if all development is focussed around those settlements which are the most sustainable and well connected areas, then those which are not will forever remain unsustainable. Should there not be the opportunity through the NDF to allow for such settlements to become more sustainable through the delivery of housing, employment and associated public services and facilities within and alongside them?

Policy 2- There is some concern with this policy due to the fact that although it states a sequential approach should be taken when locating public services, it also states

that only in exceptional circumstances should they be located outside of town and city centres. Again the concern with this is lack of land for these services within towns and city centres. The premise of this policy is completely understood and it is supported that people need to be able to access these services easily and via a range of transport methods. However these locations can be outside of town and city centres and still be in sustainable locations and accessible via public transport.

Accordingly, there needs to be greater consideration given to the identification of appropriate sites for specific public uses in the first place. Considerable public investment is given to such developments, and their long term suitability and sustainability is paramount. It is not appropriate to re-locate such buildings with changes in future policies.

Policy 3 - Whilst the Local Authority accepts the role that it has with regards to using its own land for development and a responsibility to ensure that it is used for the best possible use, particularly when it is in a sustainable location, there is some concern regarding competing objectives. For example;

- Local planning authorities have to ensure that there is enough affordable housing delivered on its land (Ministers letter);
- There is a Welsh Government objective to use Council land for self-build housing;
- There is a need to ensure that there is a 5 year housing land supply; and
- Council owned land needs to be considered for its contribution to the provision of green infrastructure.

There is limited land left that the Council owns and not all of these objectives can be achieved. Welsh Government need to understand this conflict and prioritise what should be achieved.

It is also queried how this approach will work with regards to the principle of best value that the Council has to adhere to and if these guidelines will be changed. The development that delivers one or more of the objectives above, may not necessarily see the best financial return achieved for the sale of the land. Clawback is another issue that needs to be considered with regard to this policy.

In general terms it should also be accepted that although the growth areas identified are broad, that not all land within these boundaries should be or is capable of being developed.

Whilst the principle of being carbon free is supported it is questioned how this will be entirely possible for some areas such as parts of the valleys where public transport is not as well connected as it might be.

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 checked="" 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?

The Council fully understands and supports the need to increase affordable housing however there is some concern with regards to how this will be achieved.

It is noted that the figures quoted in the NDF are estimates and that these will need to be refined and evidenced through the subsequent SDP and LDPs. Nevertheless, it also states that 47% of the additional homes delivered over the next 5 years should be affordable.

In general terms whilst the need to increase the provision of affordable housing is accepted and supported, it is a major concern in Rhondda Cynon Taf that the planning system is seen as the main method of doing so. All the competing priorities are creating reduced viability of development schemes, which is already a major concern in the valleys areas. This will be compromised further if the percentage of affordable housing requirements on otherwise private developments are increased to such a level. A situation may arise where you get no development at all in certain areas as it is not viable for private housing developers to bring sites forward.

Alternatively, Welsh Government needs to ensure that additional Social Housing Grant is available to deliver more affordable housing of this kind. Another solution would be to release significant funding to unlock non-viable sites, particularly the brownfield ones, that would otherwise be suitable for housing. It also needs to understand that a site will not be capable of achieving all of Welsh Governments priorities whilst still remaining viable. It also needs to release some of the land which it owns and to ensure that there is a method of dealing with clawback which affects many sites in Wales.

The Council accepts the need for development plans to increase the provision of affordable housing but this needs to be based on evidenced need in areas not just the concept of increasing provision. It is also considered that the planning system should not and cannot be the only method of creating additional affordable housing.

Other methods to provide affordable housing should also be recognised. This could be through the existing stock (empty properties etc.) rather than building new.

There is also a need to ensure a more diverse range of types of affordable housing is delivered to meet the complexity of needs that exist within our communities

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 checked="" 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?

The Policy is supported in principle.

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

The Council agrees that there is a need to encourage the provision of infrastructure

for LEV and for more people to use this type of vehicle. However, the point needs to be raised that retrofitting infrastructure and requiring developers to include it within their schemes comes at a cost. This along with all other obligations, not least the need to increase the affordable housing provision all affect the viability of sites.

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"/>

Policy 8 is generally supported. Local authorities have a better idea of the important areas for biodiversity and ecosystem services than NRW. Co-production of the Area Statements would allow for information to be shared. The indicative maps referred to on p34 don't exist at the current time and we have had no involvement in preparing them.

Policy 9 National Forest

Support is given to an increase in woodland cover. It is welcomed that the 2,000 hectares per year is 'increased woodland cover' and not 'area of trees planted'. In RCT and most of the Valleys, natural woodland regeneration is taking place everywhere unless active management (such as grazing or mowing) or wildfire prevent it. Scope for increased woodland cover should be sought in ways that minimise soil disturbance, imported tree (and potential disease) stock, plastic tubes, stakes, herbicide etc. Hopefully, this will result in 'the right tree in the right place' and a much better biodiversity and ecosystems resilience than 'even aged' tree plantations.

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

The Council agrees with the objective to lower carbon emissions in Wales. However the Council has concerns with the Priority areas identified for renewable energy.

Although it is quite difficult to ascertain the detailed boundaries from the map, it appears that the vast majority of the Southern part of RCT is within the solar and wind energy priority area that was not previously in the TAN8 SSAF search area. The previous search area on the mountain ridge between the Rhondda Fach and Cynon Valley has also been extended further south towards Abercynon and across to the ridge between Mountain Ash/Abercynon and the Taff Valley (Merthyr Tydfil).

There is concern regarding these priority areas as RCT has seen considerable development of renewable energy within the previous strategic search area. There is specific concern regarding these additional areas that were not identified in the previous search area, or not otherwise having existing renewable energy structures. The question is posed regarding why the areas which already have renewable energy schemes within them can't be investigated first rather than identifying areas which are at present untouched by these features.

Although the policy provides criteria against which schemes should be judged by including them in the 'priority area' there is an assumption that renewable energy schemes in these areas will be granted. It is also queried why the criteria for priority areas and non-priority areas is essentially the same? This again leads to the assumption that schemes in the priority areas will be granted otherwise what is the point of two separate policies given that the criteria is the same.

The scope for mitigation/ refusal must include local designations as well as National ones where the impact is of strategic importance. This is because the National

designations do not necessarily reflect current levels of knowledge about habitat extent, diversity, condition and local historical and landscape value etc.

It is also notable that some areas identified in the priority area are quite inaccessible and therefore there is an increased carbon footprint in engineering access roads etc. This process can also destroy habitats and landscapes which seems counterintuitive.

The Council has concerns regarding the impact that these major renewable energy developments may have on high quality landscapes in RCT. Conversely, if we were to consolidate renewable energy schemes in areas which already house the major windfarm schemes, along with encouraging additional appropriate schemes such as hydroelectric and solar, then there may be potential to create tourism and tourism/educational destinations in these areas. We need to protect the landscapes in the areas where they are currently absent.

In general the Council queries what evidence has been used to identify all these priority areas and why other forms of renewable energy is not being explored such as Hydroelectric schemes.

District Heat Networks

The Council feels that there should not be a full reliance on these types of networks as their long term success has not often been proven. More assurance is needed that the technology surrounding them needs to be improved and care taken to ensure that they are fair and equalised.

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

The Council supports the development of a Strategic Development Plan.

However, 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.

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 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?

[illegible]

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

Overall the Council supports the approach for the South East Wales region. The Council supports the continued role of Cardiff as the primary National centre and this seems a sensible approach for the region.

The Council welcomes the identification of Pontypridd as a regional growth centre but does query why there is not a policy which sets out the role of such regional growth centres. There appears to be a policy in Mid and South West Wales region (policy 24). The Council considers that a policy which identifies what the role of the regional centres of growth is required.

The Council supports policy 29 and is pleased to see recognition of the Heads of The Valleys area as an important area which has potential to see investment and growth. It is also agreed that Welsh Government has a role to play in the delivery of investment in this area. There needs to be strong recognition of the potential that this corridor has. However, we would welcome further identification of the A465 Heads of the Valleys road dualling, the likelihood of this being completed in the first half of the NDF plan period and recognition of the economic benefits that are expected as a consequence of this massive Welsh Government investment here. Tourism should also be promoted in the Heads of the Valleys area as it is felt that there is great potential for this use.

Further to this east-west corridor recognition, is the request to include the delineation of the A470 trunk road linking Cardiff and the Valleys into the Mid Wales region, (as is conversely in their regional map). Although no major economic links, there is considerable cross boundary social/tourism interaction between our region and the Brecon Beacons National Park, with wider links with the rest of Mid and North Wales.

The Council supports the development of the South Wales Metro and will seek to ensure the land in good proximity to this and other sustainable transport modes are explored for its development opportunities.

Policy 33 – Valleys Regional Park, although the concept of this appears to be positive, the Council considers that there is not enough explanation of exactly what this is. This is particularly problematic as the policy seeks that the principles of the Valleys Regional Park are embedded into the SDP and LDP. The Council would like more clarification in this policy with regards to what it is and what its principles are.

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 further comment to make.

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 further comment to make.

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 further comment to make.

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?

Flood risk

None of the proposed 11 outcomes refer to managing flood risk in Wales. The NDF recognises that climate change is the greatest threat to development in Wales, however flooding and managing its impacts is not included within the framework. This very light reference to flooding and flood management does not draw enough consideration to how flood risk will limit development opportunities across Wales.

Flooding is one of the greatest natural hazard risks in Wales and the risk of flooding is only expected to increase as a result of climate change. We must have a framework that gives direction and guidance to how Wales' future development can adapt to the impacts of climate change, especially adapting to increased flood risk.

There must be greater attention drawn to how future development across Wales can ensure long-term sustainability and resilience against flood risk from all sources, including coastal, fluvial and pluvial that effect all 3 regions.

It should also be noted that the NDF does not refer to, or identify the requirement for Sustainable Drainage Systems (SuDS) and SuDS Approval Body (SAB) under Schedule 3 of the Flood and Water Management Act 2010.

There should be more recognition given to hydroelectric power generation in the NDF rather than just the reliance on wind and solar power.

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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