

Consultation Response Form

Your name	Carole-Anne Davies Chief Executive
Your address	Design Commission for Wales 4th Flr Cambrian Buildings Mount Stuart Square, Cardiff CF10 5FL
Preferred contact details (email/phone/post)	Email: cad@dcfw.org
<u>Organisation (if applicable)</u>	<u>Comisiwn Dylunio Cymru</u> <u>Design Commission for Wales</u>

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:

NDF Outcomes

We would wish to see explicit support of for quality place-making, urban-design, architecture and design as a key NDF outcome. The Commission would be pleased to offer further assistance in the drafting of a suitable NDF Outcome statement. The illustration on PG45 exemplifies poor quality of architecture and place-lessness that is too often accepted in many parts of Wales, and which offers nothing to the place-led approach, long term public value or positive contribution to the well-being of current or future generations.

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 checked="" 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 checked="" 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:

Policy 1 Sustainable Urban Growth

- DCfW supports this policy

Policy 2 Supporting Urban Centres

- DCfW supports this policy

Policy 3 Public Investment, Public Buildings and Publicly Owned Land

- DCfW supports this policy
- Delivery of quality public housing, mix use and amenity on this land is particularly important and should be place-led

Policy 4 Supporting Rural Communities

- DCfW supports this policy
- The need for well-designed changes to support emerging new needs of small communities is of particular importance and should be place-led

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 checked="" 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?

Policy 5 Delivering Affordable Homes - We agree but have the following comments:

- DCfW supports this policy
- The active participation of public authorities in the delivery of this policy using publicly owned land is essential
- The elimination of homelessness in Wales should be a strategic objective stated here
- Affordable homes should be of the highest quality and central to wider place objectives

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 checked="" 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?

[illegible]

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

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

We agree but have the following comments:

Policy 9 National Forest

- DCfW supports this policy
- Forest for nature conservation and forest for timber production and carbon storage should be considered in relation to Policies 8 and 9

Policy 10 Wind and Solar Energy in Priority Areas

- DCfW supports this policy
- Acknowledgement of the positive contribution that well-designed infrastructure can make to landscape settings should be explicit here. (See DCFW Landmarks report)

Policy 11 Wind and Solar Energy Outside of Priority Areas

- DCfW supports this policy
- Acknowledgement of the positive contribution that well-designed infrastructure can make to landscape settings should be explicit here. (See DCFW Landmarks report)

Policy 12 Wind and Solar Energy in National Parks and Areas of Outstanding natural Beauty - DCfW supports this policy

Policy 13 other Renewable Energy Developments - DCfW supports this policy

Policy 14 Priority Areas for District Heat Networks - DCfW supports this policy

Policy 15 Master-planning for District Heat Networks - DCfW supports this policy

- Considerable public sector support may be required to deliver this desirable policy

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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 checked="" 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.

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 checked="" 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?

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"/>

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.

Policy 17 Wrexham and Deeside

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?

Policy 18 North Wales Coastal Settlements

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?

Policy 19 Green Belts in North Wales

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?
- It is not clear how the spatial planning policy intends to contribute positively to the desirable objective of promoting the use of the Welsh language

Policy 20 Port of Holyhead

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?

Policy 21 Transport links to North West England

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?

Policy 22 North West Wales and Energy

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?

Development Plan?

Policy 23 Swansea Bay and Llanelli

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?

Policy 24 Regional Centres

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?
- It is not clear how the spatial planning policy intends to contribute positively to the desirable objective of promoting the use of the Welsh language

Policy 25 Haven Waterway

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?

Policy 26 Swansea Bay Metro

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?

Policy 27 Cardiff

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?

Policy 28 Newport

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?

Policy 29 Heads of the Valleys

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?

Policy 30 Green belts in South East Wales

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?
- It is not clear how the spatial planning policy intends to contribute positively to the desirable objective of promoting the use of the Welsh language

Policy 31 Growth of sustainable transit-oriented settlements

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?
- It is not clear how the spatial planning policy intends to contribute positively to the desirable objective of promoting the use of the Welsh language

Policy 32 Cardiff Airport

- The issue of airports for Wales should be discussed much earlier in the report as a major national strategic public investment issue – encompassing the consideration of airports/services throughout Wales.
- Does Wales need a major airport?
- Should it collaborate with Bristol, Birmingham, Manchester, Liverpool to

provide international connectivity? Should Mid or North Wales based facilities be considered in relation to airports and/or air travel/trade/cargo strategies across the nation.

- If so, what are the linkages issues?
- How is air travel reconciled with the wide-ranging support for sustainability issues elsewhere in the NDF? How does it relate to the ambition for a low carbon economy and the Climate Emergency declaration of the Welsh Government? <https://gov.wales/welsh-government-makes-climate-emergency-declaration>
- What are the implications of airport/air infrastructure in this context? How are they reflected in the NDF?

Policy 33

- Is this policy needed as it restates other NDF policies?
- Is this a matter for the Strategic Development Plan and Local Development Plan?

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.

Please see covering correspondence submitted with this response.

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?

Please see covering correspondence submitted with this response.

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 see covering correspondence submitted with this response.

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.

Please see covering correspondence submitted with this response.

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?

The Design Commission for Wales

Consultation Response to National Development framework

The Design Commission for Wales has reviewed the Welsh Government National Development Framework 2020-2040 consultation draft: 7 August – 1 November 2019 and makes the following observations and suggestions in response. We accept that a great deal of work has been done and that the task is challenging and ambitious. Overall, we support the aims of establishing an NDF.

We have the following additional comments and questions which may be helpful prompts.

Overview

The National Development Framework is intended to set out spatial planning policy for the whole of Wales describing policies for the direction of development in Wales for the years 2020 – 2040.

'The NDF is a spatial plan, which means it sets a direction for where we should be investing in infrastructure and development for the greater good of Wales and its people.'

The NDF sets high-level priorities that will subsequently be developed as more detailed planning and delivery proposals through Strategic Development Plans SDPs at a regional level and Local Development Plans LDPs at a local level.

Three regions are defined in the NDF: North Wales; Mid and South West Wales and South East Wales each region combines together a number of Local Authority areas.

The NDF identifies:

- A number of challenges and opportunities
- Eleven proposed policy outcomes
- A spatial strategy for Wales
- Thirty three policies
- Fifteen policies relating Wales as a whole
- Eighteen policies relating to the three Welsh regions

A vision for the future of Wales

The document is a powerful strategic opportunity to set out a clear and compelling vision for the future of Wales and how the National Development Framework and planning more broadly, will facilitate the realisation of such a vision. This opportunity is not yet fully exploited in the draft and doing so would strengthen it and add clarity to the *necessity for* and *primary purpose of* the National Development Framework.

The document does not yet identify and communicate a compelling vision for national landscape assets or articulate a 'big idea' about the nation as a whole. Such a vision, political and strategic, is critical to the communicating the purpose of the NDF. The proposed eleven policy outcomes, whilst desirable in themselves, do not yet cohere into a unified vision for the future of the nation. Overall the NDF could be strengthened considerably if it drew more heavily on making clear how the public interest will be served by the proposed planning process – which should be after all primarily about public interest. Again, a unifying vision could draw this together and bring greater coherence and clarity of purpose to the eleven policy outcomes and the framework as a whole.

The purpose of the National Development Framework

The purpose of the NDF as currently drafted is not yet clear to the reader and leads to further questions:

- What are the objectives, priorities and desired outcomes aligned to the vision?
- What is the forty-year plan? (There is arguably the need for a plan in the NDF, however schematic at this point, spatial considerations ought to be explicit.)
- How will the plan contribute to delivering the eleven proposed outcomes?
- What data/information underpins/informs the desired outcomes?
- Why eleven outcomes not more or less?
- Are these the right ones?
- How have they been tested and prioritized?

Some of these questions may be linked to the timing of the wider policy development work however they do arise upon reading of the current draft.

Three level planning framework: The emergence of the three-level planning structure is understood however there is a risk that this becomes unnecessarily cumbersome and could lead to confusion between policies at each level. As currently drafted approximately half of the National Policy Framework deals with regional issues. It could be worth further considering the relationship between the National Development Framework and Strategic Development Plans and how to ensure they work to create a more agile and efficient two-level rather than three-level planning system for the nation. Much responsibility and work remains with the regions in developing more detailed and spatial policies which we thought might have been researched, analysed and considered at the NDF scale.

Challenges and opportunities: The Challenges and Opportunities would benefit from fresh drafting to achieve greater focus. It is currently a quite generalised commentary on what already exists without a focused statement of problems that need to be addressed through the planning process. It does not yet identify opportunities for change that the NDF will support or encourage, and that will contribute to the realisation of the vision for the future of the nation.

Targets and metrics: The document does not yet carry any form of metrics by which to assess progress toward the realisation of the desired policy outcomes. Metrics are also essential to inform the development of regional and local planning policy. Whilst it is recognised that an over reliance on data and statistics can lead to the mistake of thinking that planning is predictable science, the current document would benefit from clearly identified measurement based analysis or metrics of success.

Data is needed on the current and future projections for subjects including:

- Population and demographics
- Social and economic for the nation as a whole and for key sectors
- Environmental
- National infrastructure needs
- Development, growth and change

Transport and Connectivity: There is as yet no explicit and comprehensive transport strategy for the nation as a whole, referenced in the draft NDF. This is a critical item and will be necessary for the delivery of the plan and for a far better-connected nation. It is a critical strategic and spatial planning element and a major investment area. The absence of such a comprehensive strategy in the NDF needs to be swiftly addressed and should be consistent with a place-making approach.

General observations: The NDF will need to show clearly how investment made in the public interest at national, regional and local scales align in order to deliver the plan. In the introduction it is noted that 'It is difficult to imagine how the world may look in 2040'. Whilst this is true, the purpose of a National Planning Framework document is to address this difficulty by articulating an informed flexible plan for the future development of the nation. The current document does not yet adequately fulfil this essential purpose.

Response to the document as a whole: The NDF is intended as a strategic policy document. It would be strengthened considerably by being more succinct. Much of the general commentary and description could either be omitted or moved to Appendices. The effect of such an edit would be to make the strategic objectives and the interconnection between policies much clearer. Such a change would be of considerable assistance to those charged with preparing the more detailed regional and local plans.

Greater clarity is needed as to the types of policy that should be included in each of the three levels of plan making described in the NDF. Without such clarity there is risk of confusion, policy overlaps and conflicts between the various levels of planning. Confusion is also likely to arise between NDPs, SDPs, LDPs and the other planning legislation described in the NDF. This lack of clarity on the role of the different scales of planning is reflected in the policies set out in the NDF, as currently presented. Policies 17 – 33 deal with Regional issues. It is not clear why these policies have been identified as important at the national scale and applied to the regional scale. If these policies are to be within the NDF rather than within SDPs, their national significance and a rationale for why they have been developed at this stage needs to be clear, otherwise these policies should properly be issues for the Strategic Development Plans based on the broader policies of the National Planning Framework.

Diagrammatic representation could help achieve greater clarity.

As the Design Commission for Wales we are concerned to note the absence in the current draft of any statement relating to the importance of good design and placemaking either in the general commentary or as specific policy. We note that urban design is mentioned as important and that design innovation in relation to sustainability is mentioned, in passing. Whilst we welcome these references, a more general policy on the importance of good design seems to be a missed opportunity and omission from a strategic document of this nature, given its emphasis in PPW 10 and TAN 12. The Commission would be pleased to offer assistance with succinct, clear design messages appropriate to the plan and consistent with place-making objectives.

Challenges and Opportunities: The intention of the Challenges and Opportunities section of the framework is as yet unclear. It includes descriptions of aspects of the Welsh population, economy, culture, environment and landscape but does not set out clearly the challenges or opportunities that arise from these descriptions. For example, the Our Visitors section lists the number of visitors and financial contribution to the Welsh economy but does not illuminate what problems there are, or if this is an opportunity to be developed. This section should set the agenda for the outcomes and policies that follow. As currently drafted, it does not do so and is a missed opportunity for the NDF to help drive identifiable strategic outcomes.

The Design Commission wishes to see the NDF fulfil its originally intended role and potential as a nationally strategic, spatial framework for Wales. Our comments are made with this in mind and we will be happy to assist further to help ensure its effectiveness as a means of ensuring the delivery of well-planned and designed places in response to national need and opportunity.

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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