

## **Consultation Response Form**

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Organisation (if applicable)	<b>Public Health Wales</b>

## 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 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:

We would like to see a stronger read-across to the contribution to a more equal Wales visible in the outcomes, inequality is referenced in outcome 3, however, the interpretations on p 18 and 20 appear to differ, and especially as phrased on p 20 risk not recognising the fundamental need to take account of and seek to address inequalities, especially due to socio-economic background of individuals and communities.

## 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:

Yes, the emphasis on growing and expanding current urban areas for growth comes with a potential risk of increasing inequalities between and within communities in Wales if not carefully managed. For example, some smaller rural or deprived communities within defined urban regional areas could continue to decline and decrease in sustainability for the long term and increase migration from local to national centres and rural to urban settings.

Developing accessible, integrated transport systems is key to achieving the spatial strategy. Accessible transport will make it possible for people to live, work and play, even in rural areas.

### 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 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 approach the delivery of affordable housing?

It is essential, for future well-being, that the approach to affordable housing does not simply look at the presence of a physical house at a particular cost.

It needs to focus on, and adapt to, population changes over time at the local contextual level i.e. so that homes for life are built so that they can support the needs of householders, including vulnerable groups, to be fit for purpose and lived in throughout the life course.

The home must also be considered in its surroundings as part of a healthy place, including access to safe play, blue green space, and amenities.

### 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 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 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 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?

We believe that the NDF needs to state more clearly that it is important to switch to ultra-low emission public transport and significantly reduce private vehicle use. It is not sufficient to provide extensive charging infrastructure for private vehicles that could both impede active travel and encourage continued private car use.

## 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"/>

## 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...

[illegible]

- 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?

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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?

[illegible]

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 checked="" 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?

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"/>



## 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.

Welsh Government needs to be mindful of the potential increase in traffic, emissions and over-population of areas which will lead to stress on local services. Whilst the former is referenced, the latter is not. These need to be managed carefully at a local, regional and national level. Impact assessments of these policies and specified plans and Deals in the NDF will need to be carried out and specifically include health and impact assessments to ensure that positive impacts of planned development and growth are maximised and potential negative impacts, unintended consequences of growth and inequalities are minimised and mitigated for.



## 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.

Yes. We welcome the inclusion of Objective 2 in the ISA framework which focusses on health, wellbeing and health inequalities and that these have been considered as part of the integrated assessment of the draft NDF.

The monitoring dashboard that is developed needs to be drafted with, and linked into, public health and health service policy makers, agencies such as Public Health Wales and providers to ensure that health and inequalities are sufficiently monitored and progress against health and wellbeing outcomes captured.

## 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

## 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 comment

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.

No comment

## 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?

We welcome the inclusion and consideration of health and well-being within the draft NDF, the explicit references to health and also its place as a key objective in the Integrated Sustainability Assessment. The references to mobilising and increasing active travel, policies for increasing and improving green infrastructure and the focus on low carbon growth and sustainable energy could potentially be positive for the health and well-being of the people of Wales.

However, there is little reference to the potential impact of the NDF on mental well-being nor of the potential increase in health and other inequalities that could emerge as unintended negative consequences from the focus on future Local and Strategic Development Plans (SDPs) or Growth Plans / City Deals. These could be between urban and rural or deprived communities and regions.

We suggest that further assessment of these development and growth plans and Deals is carried out in respect to health and well-being and a consideration of inequalities both now and in the future. This would support the Welsh Government (WG) Public Health (Wales) Act 2017 requirements for Health Impact Assessment (HIA) by public bodies in specific circumstances. There are strong hooks in the draft NDF to enhance population health and wellbeing in the long term such as improved air quality, employment opportunities, housing affordability and accessibility and any assessments would also capture these and provide opportunities for maximisation and involvement of key stakeholders in the Plan/Deal development.

For the identified Regions, reference is made to Strategic Development Plans. According to WG's Designating a Strategic Plan Boundary and Establishing a Strategic Planning Panel (SPP) (March 2019) "it is envisaged the earliest an SDP would be adopted is 2025" it is important that Local Planning Authorities are able to embrace (with consultees) the intentions of the NDF in the near future rather than delaying action until any SDP is approved. We would like to see firm steps taken to in the intervening period in improving the health and wellbeing of communities in line with the Well-being of Future Generations (Wales) Act 2015.

To put good planning into practice, we recognise the important role that an independent, informed, local government planning department plays. It is estimated that the real term changes in spending on planning in local government in Wales fell by 52% between 2009/10 and 2016/17 (Institute for Fiscal Studies, 2016), this is an issue the Welsh Government may want to consider in future.

The Framework is light on describing collaboration with consultees on strategic decisions. As the primary public health agency for Wales, it is important that Public Health Wales are engaged early on in national and strategic discussions and decisions on the health and wellbeing of national and local populations. This is also true of the monitoring of the NDF and its outcomes in the short and long term.



**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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