

### Consultation Response Form

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<u>Organisation (if applicable)</u>	<b>Aneurin Bevan University Health Board</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 agree with the 11 outcomes as the ambition for the NDF, and we note that there is good alignment with these outcomes and Building A Healthier Gwent, which is our strategy for how we achieve the ambition of people in all communities across Gwent living more of their lives in good health.

Outcome 9 should include an explicit reference to air quality. This is important because air quality has direct harmful effects on people's cardiovascular and respiratory health. Individuals and communities who are not in good health can be disproportionately affected by exposure to air pollution.

Given the huge challenge of climate change, it is unfortunate that the outcome related to decarbonisation is presented as the last outcome in a set of 11. Even with acknowledgement that the outcomes are interrelated, consideration should be given to presenting this as the first outcome in order to avoid signalling that environmental outcomes are less important than economic outcomes.

Although referenced at the start of the NDF document the alignment of the 11 outcomes in the NDF to the Well-being of Future Generations Act 7 national goals is not explicitly set out in the document.

The NDF makes no reference to its strategic alignment to Building a Healthier Wales, or Healthy Weight Healthy Wales.

The outcomes set out on pages 18 and 20 & 21 are presented differently.

## 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:

### **Spatial Strategy : Gwent issues**

The spatial strategy set out does not recognise Newport Docks as a strategic port, given its national importance for trading goods, and its ambitions for the future.

Ebbw Vale be considered as a regional growth area.

Consideration should be given to how intra-urban connectivity moves East and West in the South East Wales region between Cardiff and Newport and not just from the Valleys south.

Policy 1 - The focus on sustainable travel is welcome, however, the wording needs to be stronger to support car free development as a priority.

**Policy 2 - Supporting Urban Centres**

The idea is that all new public service facilities of a significant scale should be located in town and city centres. It would be helpful to include stronger reference to place-making and designing in community health and well-being, so that places are supportive of community health and health and well-being.

Consideration needs to be given to how to mitigate the potential disadvantages of this approach, including the issue of access to services for people that won't live in or near to town or city centres. If there is a time lag with the development of sustainable transport infrastructure then people in many parts of Gwent could be left behind and without access to services needed to support their well-being.

Policy 3 - This policy focuses upon transport, however, the issue of air quality is not mentioned, which is a significant omission.

**Policy 3 – Public Investment, Public Buildings and Publicly Owned Land**

All public landowners are expected to undertake strategic reviews of their land holdings in Wales and consider the NDF Outcomes and spatial strategy. Where publicly owned land could support sustainable places, positive consideration should be given to the future use of this land and whether it could support new mixed use development, including affordable housing and new commercial activities, or transport infrastructure. The LDP is expected to review publicly owned land to identify potential sites for development and re-development. This approach would need to be supported by a change to legal requirements to achieve best value on publicly owned land. Overall the principle is supported.

Policy 4 - Supporting our rural areas –we agree that tourism is important to supporting rural Wales, however, more emphasis should be placed on sustainable tourism, and in particular sustainable travel that could benefit local communities and tourists alike.



### 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?

The encouragement to build more affordable homes is welcomed and supported, and this is in line with the Ambitions of Building A Healthier Gwent. The quality of the housing built is however, is also important and the building design needs to be safe, warm and suitable for individual's needs.

It is not clear how some areas of Gwent, including Blaenau Gwent will be able to deliver the level of affordable homes set out in the NDF. Further consideration needs to be given to how the ambition for affordable homes could actually be delivered.

The NDF should consider how it discourages large-scale mono-tenure housing that will not be conducive to creating cohesive communities. It should be recognised through the NDF that in order to build quality places where people want to live, new housing development needs to deliver a mix of house types and tenures.

In relation to Policy 28, we welcome the recognition of the strategic importance of Newport within the South East Wales region. There is evidence that the provision of new housing and associated infrastructure in Newport has attracted both people from neighbouring local authorities where property prices are higher and people from other areas of the region seeking to be closer to employment, transport links and services that the city provides. Working at a regional level will better reflect the impact Newport has on the region as a whole.

#### 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 principle is supported, but more detail is needed to clarify implementation:

- when the zones will be identified,
- whether supplementary planning guidance going to be prepared
- consideration given to whether the zones should be identified as part of the NDF the same way as wind and solar potential areas have been identified.

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#### 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 agree that policy 7 will enable and encourage the rollout of charging infrastructure for ultra-low emission vehicles. However, consideration should be given to whether the NDF could promote a national and consistent approach to ULEV charging points. Public Services in Gwent have collaborated to secure a grant to install EV Charging Infrastructure across 33 sites in Gwent, which will result in a total of 73 fast charge points. However, there is a risk that without a national coordinated plan for ULEV charging points there will be inconsistencies in the approaches adopted across Wales.

Air quality should be referenced within Policy 7.

## 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"/>

We welcome the commitment to reversing the decline in biodiversity and increasing the resilience of ecosystems. There is an issue with the approach and timing, however, in that the mapping of the green infrastructure will rely on emerging area statements which will come too late for the RLDP's.

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

No Comment

## 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.

We agree with the principle of developing Strategic Development Plans at a regional scale, however, the NDF will also need to more strongly recognise the strategic importance of and benefits to be gained from, planning on a wider geographical footprint. For example, Newport is part of the Great Western Powerhouse which runs from Swansea in the West to Swindon in the East.

Policy 16 – Strategic Policies for Regional Planning should include a 'Sustainable Travel Strategy'



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

Policy 28 –page 64. It is noted that the document states that the SDP will need to consider the interdependence between Cardiff and the wider region. The existing Newport-Cardiff Green Belt is missing from the spatial diagram.

Policy 30 – page 66. It is noted that document states that the Strategic Development Plan must identify a green belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff.

We welcome this policy; however, consideration should be given to move the southern boundary north to cover the heart of Monmouthshire area only. We make the following submission in this regard.

Monmouthshire faces a number of challenges now and in the future including demographic change, climate change, income and health inequalities and access to housing and transport.

Population projections show;

- 27% reduction in people aged 18-24 years from 6,230 (in 2017) to 4,570 (in 2035)
- 15% reduction in people aged 25-34 years from 8,850 (in 2017) to 7,490 (in 2035)
- 38% increase in people aged 65 years and over from 22,760 (in 2017) to 31,490 (in 2035) with largest increase (127%) in people aged 85 years and over from 3,190 (in 2017) to 7,230 (in 2035)

An ageing population brings many opportunities; however, increasing number of people living with long term conditions, very often living on their own, is creating a pressure for health, social care and housing services.

Wage levels available for local jobs in Monmouthshire are lower than the average for Wales and the UK. When coupled with high property prices and with limited land available for future housing development this makes it difficult for young people and futures to live and work locally. Monmouthshire is already struggling to recruit and retain a social care workforce to care for the increasing number of people living with long term conditions.

To address these challenges, Monmouthshire PSB has agreed the following four wellbeing objectives:

1. Provide Children and Young People with the best possible start in life
2. Respond to the challenges associated with demographic change
3. Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change
4. Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county

To achieve these Wellbeing Objectives, all the Monmouthshire PSB partners are working collaboratively to create future development and investment opportunities in Monmouthshire. However, the National Development Framework 2020-2040 neither provides significant development opportunities nor assurance of future investment in Monmouthshire.

## 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, and 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 comment.

- One of the recommendations was that 'the NDF could more closely consider the potential impact of dense development in urban locations on air quality and the extent to which this can be managed through the design and layout of development.' There is not much in the NDF related to air quality and increased housing development.

## 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 comment.



#### 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?

No comment.

**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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