

# Betsi Cadwaladr University Health Board

## Response to consultation on the National Development Framework 2020 - 2040

1. NDF Outcomes (chapter 3)	
The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.	
<ul style="list-style-type: none"> <li>Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?</li> </ul>	Strongly agree: However see comments below
	Agree
	Neither agree nor disagree
	Disagree
	Strongly disagree
	Don't know
	No opinion
<ul style="list-style-type: none"> <li>To what extent do you agree with the 11 Outcomes as ambitions for the NDF?</li> </ul>	Agree with all of them
	Agree with most of them: However see comments below
	Agree with some of them
	Agree with none of them
	Don't know
	No opinion
<ul style="list-style-type: none"> <li>If you disagree with any of the 11 Outcomes, please tell us why:</li> </ul>	<p>To ensure the NDF is successful in making Wales a fair, green and prosperous place the outcomes need to be re-prioritised to reposition a decarbonised place/ region/ Wales as the primary outcome. This is a 20-year NDF and action must be completed within that time-period in order to urgently tackle the Climate Emergency and to meet WG ambition for Public bodies to be carbon neutral by 2030. Aligned with the primary preventative approach to be carbon neutral is the secondary/tertiary preventative approach needed to protect our coastal towns and villages that are living with the real impact of climate change today, particularly in relation to flooding. Communities such as Fairbourne in Gwynedd are facing significant challenges in maintaining community wellbeing and resilience in the face of the very high risk of a significant flood event during the lifespan of the NDF. Recent analyses have provided us with a list of coastal communities such as Fairbourne that are most at risk, and there is more we need to do as leaders both locally and nationally to address their pressing needs, mitigate risks wherever possible, and intervene earlier to optimise health and wellbeing and avoid larger costs to the public purse.</p> <p>The NDF must ensure that there is equity of investment across Wales both investment in socially and economically deprived areas and also investment in sub regional centres / market towns so that within rural areas there is a focal centre of social, community and economic services/ activities. The NDF should not solely focus on improving transport from such areas to the 'Economic/ urban areas of Wales and into England'. The majority of the population in north west Wales live in small towns/ villages. Therefore, in order to reduce the decline in the use of</p>

Welsh (which predominantly is the first language), to reduce migration out of the areas and to reduce associated transport costs (environmental and economic), there is a need for the NDF to prioritise affordable homes, well paid secure employment and quality services available locally in the sub regional towns. A place-based approach can utilise the assets established in an area over many decades. Providing services within the places or close to the places where people live is therefore essential, alongside optimising the use of, and infrastructure for, technology to support timely access to high quality services. There is also a need for the NDF to plan and invest in affordable, integrated, frequent, low carbon public transport to link the sub regional towns to each other and to the larger urban areas further afield. Ensure planning refocuses from the 'Car as the main transport to access work and social activities' to being low carbon public transport.

Comments for each outcome 'A Wales where people live...

1. and work in connected, inclusive and healthy places: This requires investment into sub regional towns/ areas which are the hub of social/ economic/ cultural activities and services for the immediate vicinity e.g. in north Wales - Ruthin, Caernarfon, Llangollen, Dolgellau, Porthmadog, Pwllhelli, Bala, Mold etc.
2. In vibrant rural places with access to homes, jobs and services: This requires significant investment from Welsh Government, local authority, and housing associations to increase the number of affordable homes
3. In distinctive regions that tackle health and socio-economic inequality through sustainable growth: Not sure what this actually means. Housing and secure, well-paid employment are key drivers of inequality
4. In places with a thriving Welsh Language: This can be achieved by increasing a sense of place in all areas of Wales and by reducing the 'pull' both economic and social - to urbanised areas, which have the lowest levels of Welsh speakers. A decline in Welsh use could be an unintended consequence of the NDF focusing on development in urban areas.
5. Work in towns and cities, which are a focus and springboard for sustainable growth: investing only in the urban areas will potentially, lead to over populated urbanised and deprived areas, and the remaining areas of Wales sparsely populated with poor economic and social opportunities. We therefore need investment into sub regional towns/ areas, which are the hub for the wider rural area. In addition, centralising work will increase transport to and from the urban areas and not support decarbonisation. We note however and welcome outcome 2 regarding sustainability of rural areas, which balances this, if the two outcomes are equally weighted
6. In places where prosperity, innovation and culture are promoted: This is a good aspiration - supporting a stronger sense of culture will also help to maintain Wales as an attractive tourist destination with subsequent positive impact on local economies

	<p>7. In places where travel is sustainable: There is a need for the NDF to invest in and develop integrated low carbon public transport e.g. trains/ metro/ buses. These need to be affordable, frequent and go between sub regional towns as well as to the urban centres</p> <p>8. In places with world-class digital infrastructure: Agree</p> <p>9. In places that sustainably manage their natural resources and reduce pollution: Focusing on local place-based development will support this. There is a need for all developments to have a Health Impact and Environmental Impact Assessment. There is a need for developments to prioritise environmental sustainability, waste reduction and health &amp; well-being beyond the economic drivers</p> <p>10. In places with biodiverse, resilient and connected ecosystems: As point 9</p> <p>11. In places which are decarbonised: <b>As described this should be the overarching priority and primary objective which is supported by the other 10.</b></p>
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## 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...

Urban areas (Policies 1, 2 & 3)	Strongly agree
	Agree
	Neither agree nor disagree
	Disagree: However see below comments
	Strongly disagree
	Don't know
	No opinion
Rural areas (Policy 4)	Strongly agree
	Agree
	Neither agree nor disagree
	Disagree: However see below comments
	Strongly disagree
	Don't know
	No opinion
Urban areas	Urban areas
	Urban areas: Co-locating homes, jobs and services is a good aspiration; however, the sole focus should not be on cities and large towns as the main development areas. Agree, that we should not support the development of new towns and enabling sprawling greenfield development; however, there is a need to develop smaller market town / sub-regional towns, which have historically served rural areas. WG need to sustain good public transport services and a range of economic activities irrespective of the critical mass of people otherwise

there will be inequalities in opportunities in rural areas, migration of young people and a loss of cultural, social and economic opportunities in the rural areas (including diminishing use of the Welsh language).

Within urban areas, you need growth and a focus on enabling more people to walk and cycle for everyday journeys. However, if you solely concentrate on urban areas, you will increase transport into those urban areas and reduce the opportunities for accessible, affordable homes (due to increased demand).

Agree - Any place without jobs, homes, community spaces and wildlife has no prospect of having a thriving and cohesive community, Welsh language or economy.

Agree - Need to renew and regenerate our cities and towns and create sustainable, healthy places, which embed green infrastructure.... However, all regeneration / renew / new developments must be based on transport by foot/ active travel / low carbon public transport and not by car (electric or otherwise). If there are higher density developments, there must be access for people/ families to their own/ communal green space from the front door and access to active travel from the front door. Plus there is a need to develop communal community areas for intergenerational activities to take place.

Agree - Successful, healthy towns and cities have a rich mix of residential, commercial and community uses... However, there must not be a single focus on the town centre, as within any town/ city there are distinct neighbourhoods, which require a communal / community/ economic and commercial centre.

Agree - High density does not necessarily mean high-rise... It should not be achieved by reducing external living space (gardens) and by increasing the number of 'Houses of Multiple occupation'. In regard to publically owned land/ buildings and sites (including any that are part publically funded), it is important to develop green communal spaces for the community and to harness the buildings themselves as sources of renewable energy e.g. solar energy and the sites/buildings should also be exemplars of waste reduction and be accessible by green / active travel.

We note the reference to public investment in and distribution of healthcare facilities including hospitals and GP practices. It is disappointing that there is no reference within P2, P3 of the potential for shared use of public assets, bringing together different public, independent and third sector organisations to maximise use of facilities.

**Rural areas:** As 40% of the population live in settlements of less than 10,000 people in Wales, these towns require investment to meet the NDF outcomes as environmentally, economically and culturally sustainable. There needs to be a national commitment and investment into these sub regional towns that are the central point of many rural communities (often market towns).



	Agree - Strong rural economies support strong and resilient communities, can reduce the need to travel, and reduce the reliance on a small number of larger economic centres.
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### 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.

<ul style="list-style-type: none"> <li>To what extent do you agree or disagree with the approach to increasing affordable housing?</li> </ul>	Strongly agree
	Agree: However - see below
	Neither agree nor disagree
	Disagree
	Strongly disagree
	Don't know
	No opinion
<ul style="list-style-type: none"> <li>If you disagree, in what other ways can the NDF approach the delivery of affordable housing?</li> </ul>	<p>There is a significant need for Welsh government, Local Authority and Social housing enterprises to invest in the development of affordable housing across Wales, both in urban and rural areas and also in areas with high rates of tourism (due to higher house prices).</p> <p>Housing is one of the major drivers of inequality in health and well-being and therefore should be a priority area for investment. Affordable houses should have equal internal living space and external green space (garden) as open market houses in the same development, they should have access from the front door to green spaces/ community areas and be a safe distances from industrial/ built up areas/ roads etc. They should have active travel / green travel options to schools/ local services and the town/ village/ city centre.</p>

### 4. Mobile Action Zones (policy 6)

<ul style="list-style-type: none"> <li>To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?</li> </ul>	Strongly agree
	Agree
	Neither agree nor disagree
	Disagree
	Strongly disagree
	Don't know
	No opinion
<ul style="list-style-type: none"> <li>If you disagree, in what other ways can the NDF improve mobile phone coverage in the</li> </ul>	

areas which currently have limited access?	
<b>5. Low Emission Vehicles (policy 7)</b>	
<ul style="list-style-type: none"> <li>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?</li> </ul>	Strongly agree
	Agree
	Neither agree nor disagree
	Disagree: see comments below
	Strongly disagree
	Don't know
	No opinion
<ul style="list-style-type: none"> <li>If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?</li> </ul>	<p>There is a need for the NDF/ WG to invest significantly in low carbon public transport, which is affordable, accessible and frequent. Metro / bus routes should link key sub regional towns together and link to more urban areas. The routes need to align with the proposed health and social care services that are being developed, as well as to job opportunities in the local vicinity. Routes should not be constrained by the local authority / welsh footprint.</p> <p>Solely prioritising electric vehicles with charging points will not support the cultural shift required away from the 'Car' to low carbon public transport and active travel options. If we redesign our homes/ jobs and social activities within cities/ towns and rural areas that are close to where people live, in addition to optimising the use of technology, then we will reduce the overall need for travel. Investment should be prioritised towards low carbon public transport and active travel rather than electric cars and charging points.</p>
<b>6. Green Infrastructure (policies 8 &amp; 9)</b>	
<ul style="list-style-type: none"> <li>To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?</li> </ul>	Strongly agree
	Agree
	Neither agree nor disagree
	Disagree
	Strongly disagree
	Don't know
	No opinion
<b>7. Renewable Energy and District Heat Networks (policies 10-15)</b>	
<ul style="list-style-type: none"> <li>To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...</li> </ul>	
Large scale wind and solar developments	Strongly agree: However see comments below
	Agree
	Neither agree nor disagree
	Disagree
	Strongly disagree
	Don't know
	No opinion

District heat networks	Strongly agree
	Agree
	Neither agree nor disagree
	Disagree
	Strongly disagree
	Don't know
	No opinion
<ul style="list-style-type: none"> <li>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?</li> </ul>	<p>All developments should be required to have a Health Impact and Environmental Impact Assessment before developing the renewable energy site. This will help to ensure that there are no adverse impacts on health and wellbeing of the local population and the environment. For example from:</p> <ul style="list-style-type: none"> <li>The renewable technology</li> <li>The construction of the site</li> <li>The transport/ access both in the short term and then during decommissioning of the site</li> <li>The transport of electricity from the site to the national grid network e.g. pylons/ underground cables</li> </ul>

## 8. The Regions (policy 16)

<ul style="list-style-type: none"> <li>To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?</li> </ul>	Strongly agree
	Agree
	Neither agree nor disagree
	Disagree
	Strongly disagree
	Don't know
	No opinion

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.

**Comments:** We welcome the emphasis on the embedding of placemaking as an overarching principle, and the drive towards regional approaches to develop Strategic Development Plans. We welcome further discussion and involvement in the development of this policy, but note however the need to balance local place-based planning and specific needs with an overarching regional plan. Given the diversity of the North Wales region, in geographic, demographic and economic terms, this will require careful balancing.

The practical mechanism for regional planning for e.g. housing development may require further clarification within the NDF. In North Wales the Local Development Plans (and RLDPs) are at different stages of development and there would be some challenge in further joining up the planning because of pre-existing commitments. We note this is referenced within the NDF.

## 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.

<p>• To what extent do you agree or disagree with the proposed policies and approach for the North Region?</p>	Strongly agree
	Agree
	Neither agree nor disagree see comments
	Disagree
	Strongly disagree
	Don't know
	No opinion
	<p>Whilst the proposed model aims to build on existing infrastructure and assets i.e. the general northern coastal area of north Wales, and Wrexham and Deeside in particular, there may be a risk of creating further inequities in development (and subsequent impacts on health/wellbeing &amp; economic opportunities and outcomes) in other areas of the region. Further detail is required to provide assurance around how these more southerly / north west Wales towns and communities will benefit from the proposed approach in order to provide equity of opportunity. It is noted that the Local Authority Population Projections for Wales (2014-based): Principal projection (published 29 September 2016) predict Gwynedd in North West Wales to be the second highest population growth area in North Wales at approx. 10,000 people (2014 - 2039) compared to Flintshire with growth of 2,100 for the same period. We note however the inclusion of Caernarfon and Bangor within the defined regional planning areas.</p> <p>In particular, we note the reference to the role of the coastal corridor in as a focus for key services. This does not appear to recognise the challenges in ensuring equitable provision of services to the rural communities.</p> <p>Agree - with the regeneration and investment in the coastal corridor from Caernarfon to Prestatyn</p> <p>Agree – to develop connectivity corridors between North Wales and England... for these corridors to become green infrastructure...</p> <p>Agree - North plays its part in decarbonising society... however north Wales should not be offsetting other areas which are not focusing on decarbonisation. All areas should be prioritising decarbonisation</p> <p>Agree - A connected, accessible region... However, low carbon public transport should be the prioritised form of transport over the car (electric or otherwise)</p> <p>Regional issues that should be taken forward include:</p> <ul style="list-style-type: none"> <li>• Cross sector investment to tackle the Climate emergency</li> <li>• Investment to develop resilient communities facing the adverse effects of the Climate emergency</li> <li>• Investment in low carbon transport links from across north west Wales to mid Wales and south west Wales</li> <li>• Development of well-paid secure employment throughout</li> </ul>



	north Wales and not just in the urban centres of Wrexham and Deeside
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## 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.

<ul style="list-style-type: none"> <li>To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?</li> </ul>	Strongly agree
	Agree
	Neither agree nor disagree
	Disagree
	Strongly disagree
	Don't know
	No opinion

## 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.

<ul style="list-style-type: none"> <li>To what extent do you agree or disagree with the proposed policies and approach for the South East Region?</li> </ul>	Strongly agree
	Agree
	Neither agree nor disagree
	Disagree
	Strongly disagree
	Don't know
	No opinion

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.

## 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.

<ul style="list-style-type: none"> <li>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.</li> </ul>	<p>What thought has been given to how the Framework sits with NHS planning, for example, will Health Boards be mandated to ensure all plans are sustainable? There is a spectrum – renewable energy, reducing our carbon footprint, ‘green’ buildings, digital solutions etc. As this framework covers the next 20 years it would be helpful to understand the milestones along the way. We understand from discussion at an engagement session on the NDF that the Team agreed to discuss with WG Health &amp; Social Services leads to look at how to reflect in NHS planning guidance (not just capital and estates).</p>
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### 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.

<ul style="list-style-type: none"> <li>Do you have any comments on the Habitats Regulations Assessment report?</li> </ul>	<p>No comments</p>
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### 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.

<ul style="list-style-type: none"> <li>What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?</li> </ul>	<p>It is encouraging to see a clear commitment to maintaining the vibrancy of the Welsh language in traditional Welsh speaking areas, especially in North Wales where a high percentage of the population live their daily lives through the medium of Welsh. It is positive that this has been outlined within the outcomes of the NDF, supported by the Well-being of Future Generations Act 2015 and the Welsh Government's commitment in its strategy Cymraeg:2050. However, it is imperative that there is also a focus on supporting the development and use of the Welsh language in less traditional Welsh speaking areas, and commitment to Welsh medium education will establish an infrastructure to develop Welsh speaking communities, leading to greater use of the language in everyday life, including workplaces. This will in turn support organisations to be able to deliver services in Welsh, reflecting a positive impact on Welsh in the workplace.</p> <p>In the proposed model for north Wales, there is a key risk to the use / status of the Welsh language and culture in relation to the further development of links between Wrexham &amp; Deeside and the north west England region. The proportion of fluent Welsh speakers in Wrexham and Flintshire is already the lowest of all north Wales Local Authority Areas. WG must ensure that the drive for economic development under the NDF does not compromise its ability to achieve other key outcomes and create further inequalities, such as in relation to the Welsh language and culture. The education sector is key to supporting a strong bilingual culture; a school's ability to provide a high quality</p>
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	<p>bilingual curriculum is often a key factor in parental decision making around their child's education. This is then linked to choice of housing and settlement, as well as parental employment, which sets the tone for future community identity, language and culture. There is a need to ensure that any Impact Assessment Methodology used in informing developments under the NDF incorporates considerations and robust evidence around the potential impact on the Welsh language.</p>
<p>Please also explain how you believe the proposed NDF could be formulated or changed so as to have:</p>	
<p>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</p>	<p>In its entirety the Health Board is pleased that the NDF offers an opportunity to increase the use of the language and welcomes the vision and drive to further enhance Welsh language opportunities both in the community and in the workplace, ensuring that the Welsh language is treated no less favourably than the English language.</p>
<p>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.</p>	<p>As previous comments, The Welsh language and culture would be promoted / safeguarded by ensuring sub-regional towns are developed, with affordable homes, employment opportunities and access to services. This will support young people to stay within the area/ communities where they grew up.</p>
<p><b>15. Further comments</b></p>	
<p>• Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?</p>	<p>-</p>