

From: [Hatti Woakes](#)
To: [NDE](#)
Subject: NORTH PEMBROKESHIRE TRANSPORT FORUM CONSULTATION RESPONSE
Date: 31 October 2019 11:28:29
Attachments: [19.10.31 NPTF response to the NDF consultation.doc](#)

To the NDF Team, Planning Policy Branch, Welsh Government:
Please find attached the response of the North Pembrokeshire Transport Forum to the
Draft National Development Framework consultation.

Regards,

[REDACTED]

HATTI WOAKES BEM

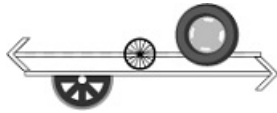
Secretary

North Pembrokeshire Transport Forum

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addresses for other recipients of transport information that is provided by the Forum. Data is held
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[REDACTED]



North Pembrokeshire Transport Forum Fforwm Trafnidiaeth Gogledd Penfro

National Development Framework Consultation

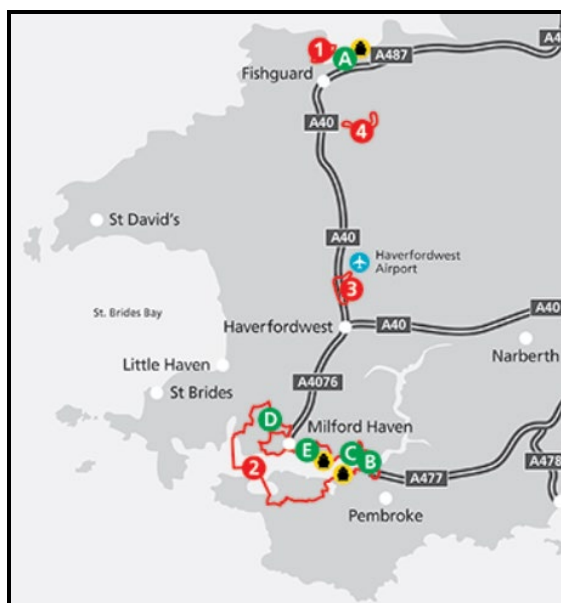
INTRODUCTION

The work of the North Pembrokeshire Transport Forum (NPTF) is focused on transport to, from and within North Pembrokeshire. NPTF supports strategic objectives that:

- Provide for the greater integration and interchange between different modes of transport.
- Put in place transport services that meet the needs of individuals and communities.
- Promote economic development and social inclusion through the further development of an affordable, accessible transport system which meets user needs and works to remove access and mobility barriers for all transport users.

NORTH PEMBROKESHIRE TRANSPORT

- Often multi-modal journeys vary widely: to/or from Ireland, Wales and the rest of the UK, as well as Europe, the Americas, and beyond.
- In Wales the main (railway) line in the south connects Newport with Cardiff, Bridgend, Port Talbot, Neath, Swansea, Llanelli and onwards to Carmarthen, Milford Haven, Fishguard and Pembroke in west Wales. (Professor Mark Barry. The Railway Network in Wales: the case for investment. September 2018, p.28).
- Goodwick and the Fishguard Ferry Port are among the key areas and sites in the Haven Waterway Enterprise Zone - an important link between the UK and Ireland and an established port-of-call for visiting cruise ships. (About Haven Waterway Enterprise Zone. 2018).



Zone Boundaries

- 1 Goodwick
- 2 Haven Waterway
- 3 Haverfordwest Airport / Withybush Industrial Park
- 4 Trecwn

Other Strategic Sites

- A Fishguard Ferry Port
- B Milford Haven Port
- C Pembrokeshire Science and Technology Park
- D Priory Park Industrial Estate - Thornton
- E Waterston / Blackbridge

THE CONSULTATION RESPONSE

The North Pembrokeshire Transport Forum (NPTF) welcomes the opportunity to participate in the National Development Framework (NDF) consultation. The consultation document includes a list of policies, strategies, consultations, research, publications and materials that have supported the development of the draft NDF.

The Forum's response will focus on matters connected to and/or of relevance to transport. The NDF document provides for responses to Chapters 3 – 5. NPTF will also provide responses to Chapters 1 and 2.

THE NPTF CONSULTATION RESPONSE

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Preferred contact details	hattiwoakes@gmail.com
Organisation	North Pembrokeshire Transport Forum

CHAPTERS 1 - 2

CHAPTER 1. INTRODUCTION

1.1 Transport references (with emphasised) NPTF focal points) in *How does the NDF fit with wider Welsh Government policy?*

- 'Transport is included in Welsh Government (WG) policies of national importance that have implications for all parts of Wales'.
- 'The Welsh National Marine Plan and the National Transport Strategy are among the broad range of Government strategies that have helped shape the NDF'.
- 'Co-ordination between marine and terrestrial planning is important in order to sustain and facilitate the development of port and harbour businesses, coastal communities and tourism enterprises'.

NPTF recommends that the NDF should include transport policies and strategies that reflect those of WG in order to facilitate the timely and effective provision of seamless, accessible transport that meets the needs of users throughout Wales and beyond.

1.2 Transport in The NDF Framework Model

- In the model's organisational chart the Wales Transport Strategy and the Welsh National Marine Plan are under the Welsh Government.

NPTF fully supports the location of these strategies, plans and strategies under Government Policy and Strategy.

CHAPTER 2. WALES AN OVERVIEW – CHALLENGES AND OPPORTUNITIES

2.1 Matters relevant to transport in Our visitors

- There were 96 million tourist day visits in 2018, 10 million overnight stays.
- Visitors from all over the world, 10% of overnight visitors coming from outside the UK.

NPTF surveys of Fishguard train usage have also provided evidence of the substantial number of visits from 'non tourist' friends and family relatives travelling to and from North Pembrokeshire by train throughout the year.

Relevant points (with bold NPTF focal points) in Our place in the world

- People travel daily in both directions to work, to shop, to socialise and access services and institutions.
- We visit and trade with Ireland, Europe and beyond and our ports, roads and rail lines are **key connections** into wider European networks.
- We are well connected to Europe but **peripheral** in a wider geographic context and will strive to maintain and enhance these connections.

NPTF rail surveys continue to provide evidence of the frequency of daily travel in both directions on Fishguard train services. Evidence of daily travel by bus and community transport is acquired in the frequent information received from (and at meetings with) Pembrokeshire County Council transport officials, members of the NPTF Executive Committee and its Individual, Family and Corporate members, as well as from the daily observation of users who regularly travel on local buses.

NPTF can confirm the importance of the daily ferry, road and rail connections referred to in the second point.

NPTF regrets the description of Welsh connections as 'peripheral', as this term's synonyms include 'marginal', 'unimportant' or 'nonessential'. Such terms are only appropriate when regular connections are not provided as a matter of course – for whatever reason.

NPTF recommends the development of policies and strategies that ensure the provision of transport services throughout all parts of Wales that maintain and enhance transport connections.

CHAPTERS 3 - 5

CHAPTER 3. NDF OUTCOMES

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	Don't know	No opinion
		✓				

- To what extent to you agree with the 11 Outcomes as ambitions for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
		✓				

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

NPTF strongly supports Option 7 in Chapter 3:

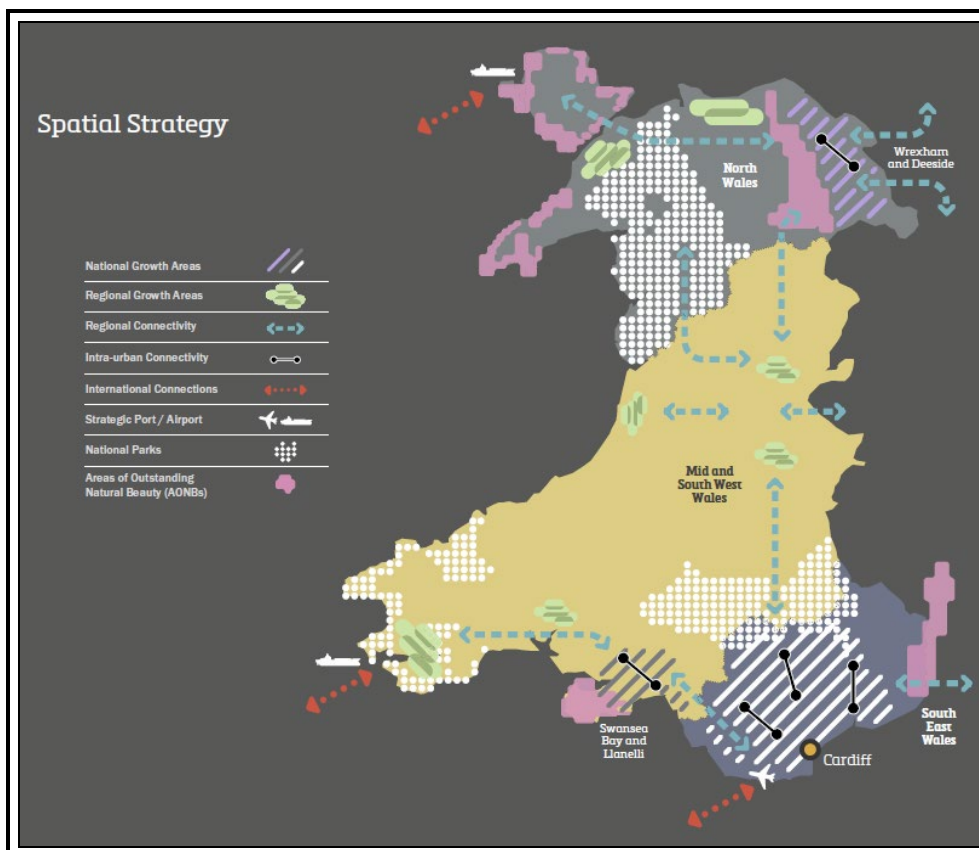
‘Active travel and public transport will be a significant part of the transport mix, allied with a reduced reliance on private vehicle use, with sustainable transport infrastructure embedded within new developments to enable easy and convenient access from one place to another for commuting, business, tourism and leisure purposes’.

CHAPTER 4. STRATEGIC & SPATIAL CHOICES: THE NDF SPATIAL STRATEGY

‘The NDF special 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 and rural areas:

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Urban areas (Policies 1,2 & 3)					✓ with regard to transport		
Rural areas (Policy 4)					✓ with regard to transport		



- N.B. The Fishguard Ferry Port & its international connections are missing.

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

The spatial strategy and key principles appear to be designed to meet and enhance the needs of a settlement hierarchy that includes, in descending order of importance: (1) the key settlements, (2) the important regional centres, and (3) all of the remaining areas and lesser settlements.

NPTF strongly disagrees with the spatial strategy because it does not include (or even refer to) strategies or key principles for developments (such as transport) that cross regional borders and are of national importance.

Some disturbing points:

- The spatial strategy sets out where in Wales growth should be focused.
- Three main urban clusters of cities and towns: Cardiff, Newport and the Valleys; Swansea Bay and Llanelli; Wrexham and Deeside.
- Developments in towns and villages in rural areas will support local aspirations and needs, complementing rather than competing with efforts to grow our cities and towns.
- Carmarthen and the Pembrokeshire Haven towns are included in the range of 'important regional centres' that make them focal points in their areas.
- By focusing large scale growth on the urban areas, development pressures can be channelled away from the countryside and productive agricultural land can be protected.

One ray of light:

- Policy 4 – Supporting Rural Communities: 'It is important that rural communities have appropriate access to wider job and economic markets, and decisions on regional economic development and transport infrastructure and services should consider the needs of all parts of Wales.'

NPTF rail surveys continue to provide evidence that

- Users of public transport systems currently travel for a variety of reasons: for employment, recreation, medical appointments, family obligations, educational pursuits, as well as on holiday (e.g. tourism – to/from international destinations). These (often multi-modal) journeys (provided by more than one operator and/or authority) cross urban and rural boundary lines on a daily basis.
- The current provision and coordination of such varied user journeys by a mixture of urban, rural and cross-border operators and authorities leaves much to be desired - given the complexity of journeys and modes of transport.
- Given the fact that transport transcends local and regional interests and requirements, it is logical for the Welsh Government to hold the responsibility for transport policy and strategy throughout Wales.
- NPTF recommends that future Welsh Government transport policies and strategies should be designed to meet the transport requirements of users throughout Wales, and rather than in separate regions, and that NDF strategies and policies should be predicated upon this prerequisite.

CHAPTER 5. THE REGIONS

1. The Regions

- 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	Don't know	No opinion
		✓ with regard to transport				

1. NPTF comments made with regard to Spatial Policies apply equally to policies for The Regions (with bold NPTF focal points), namely:

The spatial strategy and key principles appear to be designed to meet and enhance the needs of a settlement hierarchy that includes, in descending order of importance: (1) the key settlements, (2) the important regional centres, and (3) all of the remaining areas and lesser settlements.

NPTF strongly disagrees with the spatial strategy because it does not include (or even refer to) strategies or key principles for developments (such as transport) that cross regional borders and are of national importance.

Some disturbing points:

- The spatial strategy sets out where in Wales growth should be focused.
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- Policy 4 – Supporting Rural Communities: 'It is important that rural communities have appropriate access to wider job and economic markets, and decisions on regional economic development and transport infrastructure and services should consider the needs of all parts of Wales.

NPTF rail surveys continue to provide evidence that

- Users of public transport systems currently travel for a variety of reasons: for employment, recreation, medical appointments, family obligations, educational pursuits, as well as on holiday (e.g. tourism – to/from international destinations).

These (often multi-modal) journeys (provided by more than one operator and/or authority) cross urban and rural boundary lines on a daily basis.

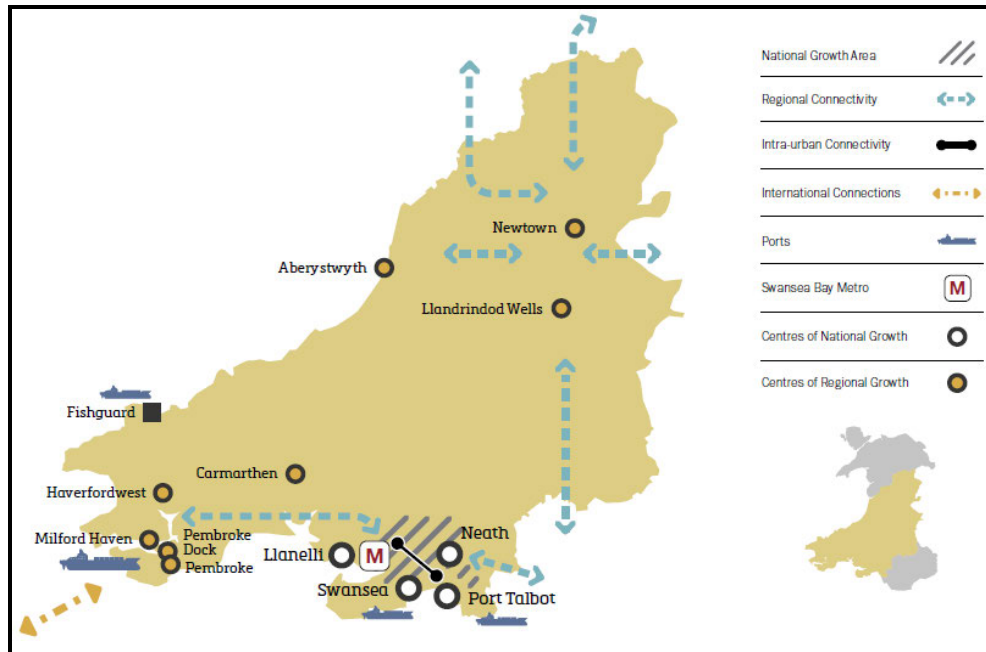
- The current provision and coordination of such varied user journeys by a mixture of urban, rural and cross-border operators and authorities leaves much to be desired - given the complexity of journeys and modes of transport.
- Given the fact that transport transcends local and regional interests and requirements, it is logical for the Welsh Government to hold the responsibility for transport policy and strategy throughout Wales.

NPTF recommends that future Welsh Government transport policies and strategies be designed to meet the transport requirements of users throughout Wales, and not just to selected regions, and that SDP strategies and policies should be predicated upon this prerequisite.

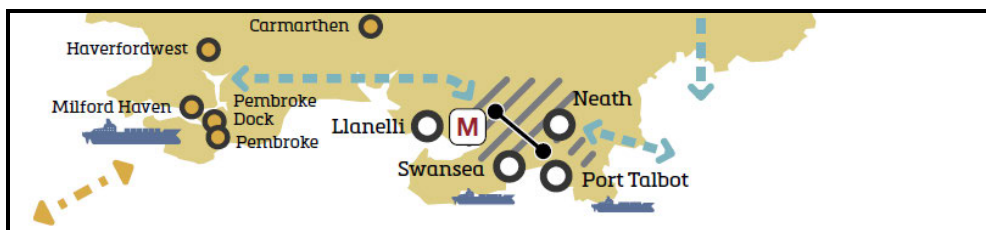
2. NPTF comments on Policy 16:

- NPTF notes that the location of key services, transport and connectivity infrastructure is included in 'Strategic Development Plans should embed placemaking as an overarching principle and should establish for the region (and where required constituent LDPs)'
- NPTF also notes the points made in the policy's closing paragraph 'Alignment of Regional Development Plans and Strategies':
 - It is important that Strategic Development Plans both shape and are shaped by other regional strategies, including the Welsh Government's Regional Economic Development Plans and City and Growth Deals.
 - If key outcomes are not aligned or do not support one another, the region's ability to deliver will be undermined.
 - Although different regional strategies will operate to different time frames and may be revised at different times, regional plan makers should explore with regional partners how evidence and consultation activities can be joined.

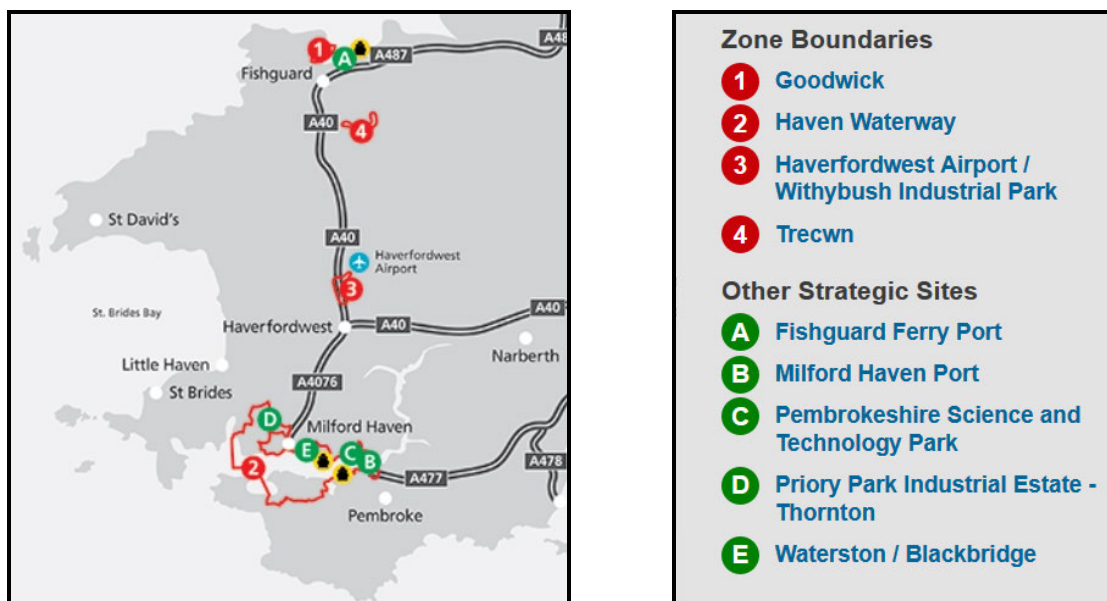
2. The Mid and West Wales Region



N.B. No indication of the international connections from Fishguard.



N.B. All the Wales key settlements and important regional centres are located in a narrow coastal strip along the southern edge of the region.



N.B. Fishguard, Goodwick and the Fishguard Ferry Port are all located within the Haven Waterway. They are not included with the other Haven towns in the important regional centres sub-group.

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	Don't know	No opinion
				✓ with regard to transport		

1. The following comments made by NPTF with regard to Spatial Policies and to The Region apply equally to policies for the Mid and South West Region (with bold NPTF focal points), namely:

The spatial strategy and key principles appear to be designed to meet and enhance the needs of a settlement hierarchy that includes, in descending order of importance: (1) the key settlements, (2) the important regional centres, and (3) all of the remaining areas and lesser settlements.

NPTF strongly disagrees with the spatial strategy because it does not include (or even refer to) strategies or key principles for developments (such as transport) that cross regional borders and are of national importance.

Some disturbing points:

- The spatial strategy sets out where in Wales growth should be focused.
- Three main urban clusters of cities and towns: Cardiff, Newport and the Valleys; Swansea Bay and Llanelli; Wrexham and Deeside.
- Developments in towns and villages in rural areas will support local aspirations and needs, complementing rather than competing with efforts to grow our cities and towns.
- Carmarthen and the Pembrokeshire Haven towns are included in the range of 'important regional centres' that make them focal points in their areas.
- By focusing large scale growth on the urban areas, development pressures can be channelled away from the countryside and productive agricultural land can be protected.

One ray of light:

- Policy 4 – Supporting Rural Communities: 'It is important that rural communities have appropriate access to wider job and economic markets, and decisions on regional economic development and transport infrastructure and services should consider the needs of all parts of Wales.

NPTF rail surveys continue to provide evidence that

- Users of public transport systems currently travel for a variety of reasons: for employment, recreation, medical appointments, family obligations, educational pursuits, as well as on holiday (e.g. tourism – to/from international destinations). These (often multi-modal) journeys (provided by more than one operator and/or authority) cross urban and rural boundary lines on a daily basis.
- The current provision and coordination of such varied user journeys by a mixture of urban, rural and cross-border operators and authorities leaves much to be desired -

given the complexity of journeys and modes of transport.

- Given the fact that transport transcends local and regional interests and requirements, it is logical for the Welsh Government to hold the responsibility for transport policy and strategy throughout Wales.

NPTF recommends that future Welsh Government transport policies and strategies be designed to meet the transport requirements of users throughout Wales, and not just to separate regions, and that SDP strategies and policies should be predicated upon this prerequisite.

2. NPTF comments on Policy 16:

- NPTF notes that the location of key services, transport and connectivity infrastructure is included in ‘Strategic Development Plans should embed placemaking as an overarching principle and should establish for the region (and where required constituent LDPs)’
- NPTF also notes the points made in the policy’s closing paragraph ‘Alignment of Regional Development Plans and Strategies’:
 - It is important that Strategic Development Plans both shape and are shaped by other regional strategies, including the Welsh Government’s Regional Economic Development Plans and City and Growth Deals.
 - If key outcomes are not aligned or do not support one another, the region’s ability to deliver will be undermined.
 - Although different regional strategies will operate to different time frames and may be revised at different times, regional plan makers should explore with regional partners how evidence and consultation activities can be joined.

Policy 23 – Swansea Bay and Llanelli

- Swansea Bay and Llanelli will be the main focus for regional scale growth and investment.
- Regional and local development plans should recognise Swansea Bay and Llanelli as the focus for strategic growth; essential services and facilities; transport and digital infrastructure; and consider how they can support and benefit from their strategic regional role.
- The Welsh Government will promote Swansea Bay and Llanelli’s strategic role and ensure key investment decisions support it and the wider region.

Policy 24 – Regional Centres

- The towns of Carmarthen, Llandrindod Wells, Newtown, Aberystwyth and the four Haven Towns will be the focus for managed growth, reflecting their important sub-regional functions.
- Regional and local development plans should recognise the roles of these settlements as being a focus for housing, employment and key services within their wider areas and consider how they continue as a focal point for sub-regional growth.

In closing NPTF repeats the following points quoted earlier in this response that point to the significant role that Fishguard/Fishguard Harbour transport services play with regard to transport in our part of the Mid and South West Region and well beyond this region:

- 'In south and north Wales, the railways shaped the pattern of urban development. The main line in the south connects Newport with Cardiff, Bridgend, Port Talbot, Neath, Swansea, Llanelli and onwards to Carmarthen, Milford Haven, Fishguard and Pembroke in west Wales'. The Railway Network in Wales: the case for investment. Prof Mark Barry (September 2018), p.28.
- Goodwick and the Fishguard Ferry Port are among the key areas and sites in the Haven Waterway Enterprise Zone. 'Fishguard Ferry Port, owned and operated by Stena, an important link between the UK and Ireland and an established port-of-call for visiting cruise ships'. About Haven Waterway Enterprise Zone (2018).

The importance of these services is noted in the Wales Transport Strategy (April 2008):

Chapter 2:

- Welsh ports also provide important passenger transport and freight (roll-on roll-off) services to Ireland...Fishguard and Milford Haven (Pembroke Dock) also handle significant levels of passenger traffic to and from southern Ireland, with over 800,000 passengers a year (2.1.17).
- Regional, national and international connectivity. The Welsh transport network includes internationally designated transport corridors to south west and south east England (and on to mainland Europe), the West Midlands and north west England and to Ireland (2.1.20).

Chapter 4:

- The most important corridors for international connectivity are the east-west routes: including south Wales Ireland/Pembrokeshire/Swansea/Cardiff to Bristol and London (road and rail).
- All of these are designated as part of the Trans European Network, recognised as priority routes for connecting EU countries. Improving the infrastructure and the reliability of road and rail along these existing routes will have beneficial effects on the competitiveness of our infrastructure.
- Key actions includes 'Improvements to the road and rail infrastructure as well as enhanced public transport services on the main east-west routes'.

NPTF has also referred to the extensive provision of bus and community transport as well as the widespread network of walking and cycling paths – all of which serve travellers to, from and within a much wider catchment area than North Pembrokeshire.

Bearing all of this in mind, **NPTF finds it difficult to support the Mid and South Wales region's strategies and policies, as North Pembrokeshire is designated as a rural area and thus excluded from the benefits that will be provided to the Mid and South West sub-region.**

NPTF also recommends the development of policies and strategies that ensure the provision of transport services throughout all parts of Wales that maintain and enhance transport connections.

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 North Pembrokeshire Transport Forum wishes to bring together the following recommendations that have been made in this response - for your consideration as a matter of significant concern on the part of our members and other individuals and groups who share these concerns.

- NPTF recommends that the NDF should include transport policies and strategies should reflect those of WG in order to facilitate the timely and effective provision of seamless, accessible transport that meets the needs of users throughout Wales and beyond.
- NPTF recommends the development of policies and strategies that ensure the provision of transport services throughout all parts of Wales that maintain and enhance transport connections.
- NPTF recommends that future Welsh Government transport policies and strategies should be designed to meet the transport requirements of users throughout Wales, rather than in separate regions, and that NDF strategies and policies should be predicated upon this prerequisite.
- NPTF finds it difficult to support the Mid and South Wales region's strategies and policies, as North Pembrokeshire is designated as a rural area and thus excluded from the benefits that will be provided to the Mid and South West sub-region.

NPTF also wishes to bring forward and emphasise the following points that have been made in this response:

- NPTF strongly disagrees with the Urban and Rural areas policies, as the Forum does not support the separation of policies for urban and rural transport planning and provision. This would do little to meet passenger transport needs or bring about the effective integration of the different transport modes and the operation of their services.
- The current provision and coordination of varied user journeys by a mixture of urban, rural and cross-border operators and authorities leaves much to be desired - given the complexity of journeys and modes of transport.
- Given the fact that transport transcends local and regional interests and requirements, it is logical for the Welsh Government to hold the responsibility for transport policy and strategy throughout Wales.

16. Are you...?

Providing your own personal response	No
As Secretary of the North Pembrokeshire Transport Forum	Yes

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.	
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