

Draft National Development Framework

1. NDF Outcomes (chapter 3)

Q1. 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?

Agree

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them

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

Sustrans supports the 11 outcomes of the National Development Framework and welcome the fact that placemaking is a central component to the framework. Sustrans suggest that placemaking is defined and provide the following definition: "Placemaking is both a philosophy (way of thinking) and an approach (way of working) that brings together multi-faceted interventions to the regeneration of a place as a means of improving its economic, social, environmental, and cultural well-being. Community engagement lies at the heart of good placemaking: placemaking should be done with people and partners rather than to people and partners." (Sustrans Cymru, 2018). Sustrans supports all of the 11 Outcomes in the document and thinks that these are integral to alleviate the effects of the climate crisis. We do have concerns that none of the issues which aim to be tackled are mapped in order to show where there is need for improvement, this would give a more strategic overview of where resources need to be focused. Sustrans believe that there will be more likelihood of achieving the 11 Outcomes if there was a clear strategy to show how they filter down into other relevant Government policies.

2. Spatial Strategy (policies 1 - 4)

Q3. 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	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)	X						
Rural areas (Policy 4)		X					

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

Sustrans support the commitment in the framework to move away from planning urban sprawl and focusing urban growth in pre-existing urban settlements. The commitment to increase development densities is essential to combating the climate crisis as well as supporting cohesive communities.

Sustrans believes that the NDF could go further and state that all people in cities and towns should live within a 20-minute walk from their everyday amenities like schools, shops, green space, and health services. Sustrans wants to see the 20-minute neighbourhood concept as a central principle of the planning system. This would support:

- vibrant, healthy and prosperous communities that engage citizens
- more journeys by foot, cycle and public transport because they are the most obvious and convenient option
- people living close to their place of work, shops and recreation; and children within walking, cycling or scooting distance of their school

3. Affordable Housing (policy 5)

Q5. 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?

Neither agree nor disagree

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

No Response

4. Mobile Action Zones (policy 6)

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Neither agree nor disagree

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

No Response

5. Low Emission Vehicles (policy 7)

Q9. 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?

Agree

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Sustrans support the roll out of charging infrastructure for ULEV's within the NDF but it needs to be recognised that Wales needs fewer cars on our roads not just newer cars.

Sustrans would like to see a plan within the NDF which shows a vision for a sustainable integrated transport system where public transport and active travel works in harmony in order to enable people to leave their cars at home. At the moment within the NDF there is no vision for this only what network we currently have and have in the pipe line. If our transport system is to look like this in the next 20 years it will be hard to deliver on the 11 Outcomes in the document.

6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Neither agree nor disagree

7. Renewable Energy and District Heat Networks (policies 10-15)

Q12. To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

No Response

Q13. 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 Response

8. The Regions (policy 16)

Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale? 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.

Agree

9. North Wales (policies 17-22)

Q15. 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?

Agree

10. Mid and South West Wales (policies 23-26)

Q16. 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?

Agree

11. South East Wales (policies 27-33)

Q17. 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?

Agree

Q18. 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.

No Response

12. Integrated Sustainability Appraisal

Q19. 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.

No Response

13. Habitats Regulations Assessment

Q20. 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 Response

14. Welsh Language

Q21. 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 Response

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: 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 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 Response

15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

Sustrans welcomes the opportunity to respond to the consultation and supports the principle of the development of a National Development Framework.

Sustrans see this as an opportunity to bring the NDF in line with the Active Travel Act. Something that has been called for by the Cross Party Group on the Active Travel Act and successfully implemented into Edition 10: Planning Policy Wales.

The Active Travel Act confers a number of specific duties on local authorities – to plan, develop and continuously improve local walking and cycle infrastructure and networks. Due to the scope of the duties, responsibility for delivery has so far mainly fallen to local authority transport and highways functions. The Act makes no direct reference to the planning system in Wales and requires no specific contribution to the delivery of the Act by local authority planning functions. This is in spite of the profound influence of the planning system upon the design and use of the built environment and the movements generated across the local highway and transport networks - movements which create many of the problems which the Active Travel Act sets out to remedy.

Sustrans think that there is an undeniable link between land use, the way we develop and the impact on how we travel. Active travel needs to be given more consideration and provision for infrastructure secure through the planning process.

Sustrans thinks that the current planning draft National Development Framework does not go far enough to deliver the Active Travel Act. The role of the NDF should be in part to deliver the Active Travel Act; and should drive a step-change in how walking and cycling is dealt with within the planning system.

Improvements have been made in Edition 10: Planning Policy Wales to ensure that active travel is at the heart of all new developments. We think that it is the NDF's role to ensure a parity of esteem between car use/public transport, and walking and cycling.

Sustrans believes that active travel is an essential factor when keeping our urban spaces moving and working.

Sustrans welcome that the National Cycle Network is recognised as an important part of Wales' national infrastructure and that its planned improvements are supported within the NDF. Sustrans believe that in order achieve parity of esteem between active travel and other modes of transport the National Cycle Network needs to be recognised as a national asset in the same regard as the trunk road network.

The National Cycle Network in Wales includes several high profile long distance routes including the Celtic Trail across South Wales, Lon Las Cymru running north-south, which incorporates the very popular Taff Trail between Cardiff and Brecon, and Lon Cambria/Lon Teifi spanning mid-Wales from west to east. An economic impact study of the Celtic and Taff Trails in 2008 showed over 2.6 million user trips per year for these routes, generating an estimated investment to the local economy of £75 million per annum.

The Network runs through three Welsh National Parks and connects with the major cities of Cardiff, Newport and Swansea in the south and other major urban areas such as Aberystwyth, Bangor and the north Wales coast.

Sustrans think that the new NDF needs to :

- Have a strategic plan for how Wales will create an integrated sustainable transport system to enable people to leave their cars at home.
- Hold the National Cycle Network in the same regard as the trunk road network.
- Provide strategic coherence, and enable better alignment between the implementation of the Active Travel Act, transport planning and development planning.
- Provide a strategic plan for the development of Wales' walking and cycling routes.

In Wales we have a history of creating forward thinking high level strategic documents which are ambitious and deliverable yet there is a delivery gap between Welsh Government policy and implementation on the ground. Sustrans would like to see an action plan on how this vision will translate into focussed investment and recourse.

There is also a need for the NDF to be clear in regards to what it means for practitioners and how they use it and understand what the NDF is for, as well as how it is different from PPW10.

Sustrans have written to you with further comments on the National Development Framework as well as supporting evidence which we were not able to attach in this response in regards to the Regions.

16. Are you...?

Q24. Are you:

Submitting a response on behalf of an organisation

Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Ellen Jones
Organisation (if applicable)	Sustrans Cymru
Preferred contact details (email/phone/post)	Email

Q26. If you want to receive a receipt of your response, please provide an email address.
Email address

[REDACTED]

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response