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Julie James AM  
Minister For Housing & Local Government  
Welsh Government  
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Ty Hywel  
Cardiff Bay  
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Annwyl / Dear Julie

**National Development Framework**

Thank you for the opportunity to comment on the National Development Framework, which was formally considered by the Cabinet on 10 October 2019.

Cardiff Council welcomes a strategic approach to development in Wales and recognises the opportunities for using the planning system to address national and regional priorities. Clearly, a strategic approach can play an important role in informing the infrastructure investment and developments needed to deliver in areas relating to economic growth, decarbonisation, resilient ecosystems, health and community well-being. As a major urban area, Cardiff particularly welcomes Policy 1, which explicitly supports sustainable urban growth given it is uniquely positioned to deliver on this.

For this approach to function effectively however, the National Development Framework (NDF) must be informed by, and respond to, the major demographic, economic, housing and transport trends across Wales. Cardiff, therefore, has serious concerns about the absence of a robust evidence base to support the development of the National Development Framework as would, quite rightly, be required to support the development of a Strategic Development Plan (SDP). This is particularly relevant for Cardiff, given that its size and scale is of regional and national significance.

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**GWEITHIO DROS GAERDYDD, GWEITHIO DROSOCH CHI**

Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg, Saesneg neu'n ddwyieithog. Byddwn yn cyfathrebu â chi yn ôl eich dewis, dim ond i chi roi gwybod i ni pa un sydd well gennych. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

**WORKING FOR CARDIFF, WORKING FOR YOU**

The Council welcomes correspondence in Welsh, English or bilingually. We will ensure that we communicate with you in the language of your choice, as long as you let us know which you prefer. Corresponding in Welsh will not lead to delay.



For example, Cardiff is projected to be the fastest growing UK Core City and over the next 20 years is projected to grow by more than every other Welsh Local Authority combined. Cardiff is also the economic powerhouse of Wales with 82% of net new jobs created in Wales over the last 5 years created in the capital city. The regional significance of the capital city is further underlined by the fact that over 100,000 commuters travel into Cardiff from outside the local authority boundary every day. Cardiff's population and economic growth therefore represents a major opportunity for Wales which the National Development Framework, as currently drafted, significantly underplays, placing a disproportionate emphasis on the challenges associated with growth.

Whilst Policy 28 recognises the capital city's growth, it also states that "*the city cannot continue to expand indefinitely without major consequences for the environment.*" The Council's LDP which is underpinned by a robust detailed evidence base demonstrates clearly that significant capacity exists for Cardiff to grow sustainably and in accordance with place-making principles for the duration of the plan period. Furthermore, significant brownfield contributions over recent decades have played a key role in delivering sustainable growth in Cardiff and there is no new evidence within the NDF to suggest that further contributions may not be achieved beyond the current plan period. Policy 28 therefore fails to recognise the sustainable city paradigm where critical mass and agglomeration effects can have major advantages for both the economy and the environment.

The National Development Framework also identifies "*Newport as the focus for regional growth and investment.*" Cardiff Council fully supports the growth of Newport, as well as any other major conurbation area within the region in line with the principles expressed in Policy 1 of the Framework. However, the Council is very concerned that rather than promoting and supporting economic and population growth in Cardiff and Newport the Framework is instead proposing a dispersal of growth from Cardiff to Newport.

Cardiff Council would argue that such a policy of dispersal could undermine Cardiff's role as the economic driver of the Welsh economy, and run counter to delivering sustainable long-term economic growth in Wales. A policy of dispersal also runs the real risk that the jobs and investment currently attracted into Wales by the capital city will not be deflected to Newport but instead would be directed to Bristol and other core cities, and thus not come to Wales at all. The Council would instead argue that the Framework should respond to the national trends outlined in paragraph 12 by supporting Cardiff's population and economic growth, and the unique role the city economy plays in the national economy, whilst ensuring that the benefits of this growth are felt across the wider Capital Region.

In supporting the proposal that "*the cultural and economic strength of Cardiff must generate region-wide prosperity and well-being,*" the Council would also urge the Welsh Government to ensure that national policy recognises the significant inequalities that exist within Cardiff. For example, if the 'Southern Arc' of Cardiff, Ely in the West to Trowbridge in the East, and area with a greater population than Newport, was a single local authority it would be by far the most deprived in Wales. The economic growth in the city centre must lead to improved outcomes for deprived and disconnected communities within the city and the wider city-region.

Given the role that the National Development Framework will play in informing both the Strategic Development Plan and Local Development Plans, the Council believe it is necessary for the National Framework to be underpinned by the same detailed evidence base expected at local and regional levels. This would include urban capacity studies and other relevant data to ensure its development is consistent with the approach to developing LDPs and any future SDP, both of which are demonstrably evidence-led

The Council would also argue that the proposals such as those in Policy 28 are not a matter for a National Development Framework, but is instead a decision for Strategic and Local Development Plans.

In summary, while Cardiff Council welcomes a great deal in the National Development Framework for the reasons outlined above **the Council cannot support the NDF as currently drafted.**

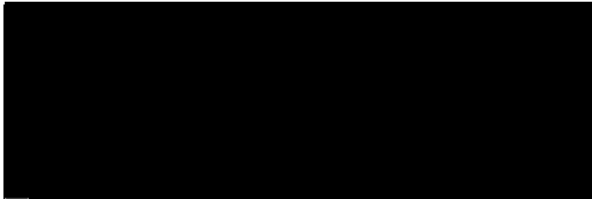
I am also concerned that the momentum which was building amongst Local Authorities to commence the SDP process may now be undermined by the NDF's evidence-light attempt to set out city-region priorities. As a constructive proposal to move the agenda forward, the National Development Framework could set out the reasons for supporting transport-orientated development or balancing growth with Green Belts, but allow Strategic Development Plans to develop the detail and spatial ramifications based on more rigorous, open and established processes. Should this not occur, it is difficult to envisage how the SDP process could commence given the misplaced policy constraints imposed by the NDF.

Further to this, the proposed Corporate Joint Committees (CJC's) based on One Authority/ One Vote governance arrangements raises considerable concerns for this Authority with regard to the SDP. Cardiff's position is that any governance for the SDP needs to have local democratic accountability at its heart. This is particularly relevant given that any regional planning system will inevitably have a disproportionate impact on the region's largest population centres. To address this issue, leaders of the Cardiff Capital Region agreed that the principles of the Strategic Planning Panel governance would be based on a population proportionate approach. This proposed model of governance is currently being considered by each Council in the region as a prerequisite for formally commencing the SDP process. To date, a number of authorities have formally agreed to initiate the process, others are to consider this in the near future.

Given that Cardiff's support for the SDP was contingent upon a population proportionate model of governance, the introduction of CJs undermines this position. Whilst it is noted that a Sub Committee of the CJC may lead on the SDP, the fact would remain that ultimate decision-making powers would vest with the CJC which is based on a governance arrangement that Cardiff does not support for the SDP.

I would therefore welcome further dialogue with Welsh Government to more fully demonstrate how the city is uniquely positioned to deliver on the 11 outcomes of the National Development Framework, and how this role can be more clearly expressed in the final version of the document. This dialogue could also explore how robust local evidence can help inform the development of the National Framework to ensure that any national plan benefits from the same rigorous assessment as local plans.

Yn gywir / Yours sincerely



**Cynghorydd / Councillor Caro Wild**  
**Aelod Cabinet dros Gynllunio Strategol a Thrafnidiaeth**  
**Cabinet Member for Strategic Planning & Transport**