

From: [Williams, Stuart](#)
To: [NDF](#)
Cc: [Clemence, James](#)
Subject: RE: Fframwaith Datblygu Cenedlaethol / National Development Framework
Date: 31 October 2019 11:01:47
Attachments: [Cardiff Council Comments on Draft NDF - Cabinet 10 Oct 2019.pdf](#)

Dear Sir/Madam,

Thank you for providing the Council with an opportunity to comment on the above document.
Please find attached the Council's comments on the Draft NDF which were agreed at the Council's Cabinet meeting on 10th October 2019.
If you have any queries please contact me.

Stuart

Stuart Williams

Rheolwr (Polisi)

Group Leader (Policy)

Cynllunio, Trafnidiaeth a'r Amgylchedd / Planning, Transport and Environment

[Cyngor Caerdydd / Cardiff Council](#)

[REDACTED]

From: Russell.Dobbins@gov.wales <Russell.Dobbins@gov.wales> **On Behalf Of** NDF@gov.wales

Sent: 07 August 2019 12:00

To: Russell.Dobbins@gov.wales

Cc: [REDACTED]

Subject: Fframwaith Datblygu Cenedlaethol / National Development Framework

Anfonwyd ar ran Neil Hemington, Prif
Gynllunydd

Sent on behalf of Neil Hemington, Chief
Planner

Annwyl gyfeillion

Dear colleague

**Drafft o'r FfDC wedi'i gyhoeddi ar gyfer
ymgynghoriad**

Draft NDF published for consultation

Rydym yn [ymgynghori](#) ar ddrafft o'r FfDC
drafft tan 1 Tachwedd 2019.

The draft NDF has been published for
[consultation](#). The consultation will run until
1 November 2019.

Ynghyd â'r ddogfen llawn, mae fersiwn
hawdd eu darllen a chrynodeb i bobl
ifanc. Rydym wedi paratoi taflen
esboniadol fer a fersiynau llawn a chryno
o'r Gwerthusiad Cynaliadwyedd
Integredig ac adroddiad Asesu
Rheoliadau Cynefinoedd llawn.

Alongside the full document there is an
easy-read version and a summary for
young people. We have produced a short
explanatory leaflet and there are full and
summary versions of the Integrated
Sustainability Appraisal and a full Habitats
Regulations Assessment report.

Byddai'n ddefnyddiol pe gallwch
hyrwyddo'r ymgynghoriad hwn trwy eich
rhwydweithiau.

It would be helpful if you could promote this
consultation through your networks.

Ni allem fod wedi cyrraedd y cam hwn
heb gymorth llawer o unigolion a

We could not have reached this stage
without the help of many individuals and

sefydliadau. Diolch yn fawr i bawb.

organisations. Many thanks to everyone.

Dewch i siarad â ni am yr FfDC drafft

Come and talk to us about the draft NDF

Os hoffech siarad â ni am y drafft o'r FfDC, byddwn yn cynnal [sesiynau galw heibio](#) ym mis Medi a dechrau mis Hydref, yn Aberdaugleddau, Abertawe, Aberystwyth, Bae Colwyn, Bangor, Caerdydd, Caerfyrddin, Casnewydd, Llandrindod, Merthyr Tudful, Y Drenewydd a Wrecsam.

If you would like an opportunity to talk to us about the draft NDF, we will be holding [drop-in sessions](#) in September and early October, in Aberystwyth, Bangor, Cardiff, Carmarthen, Colwyn Bay, Llandrindod Wells, Merthyr Tydfil, Milford Haven, Newport, Newtown, Swansea and Wrexham.

Mae croeso i chi ddod draw ond nodwch fod y sesiynau hyn yn destun galw a bydd yn rhaid i chi gadw slot penodol. Os hoffech gael mwy o wybodaeth, neu i gadw slot, [cysylltwch â ni](#).

You are very welcome to come along but please note these sessions are subject to demand and you will have to book your slot. If you would like more information, or to book a slot, please get in [touch](#).

Cofion

Regards

Neil Hemington

Neil Hemington

Russell Dobbins

Tim y FfDC | NDF Team

Y Gyfarwyddiaeth Gynllunio | Planning Directorate

Llywodraeth Cymru | Welsh Government

0300 025 3261

Dylai'r datganiadau neu'r sylwadau uchod eu trin fel rhai personol ac nid o reidrwydd fel datganiadau neu sylwadau gan Llywodraeth Cymru, unrhyw ohono neu unrhyw gorff sy'n gysylltiedig ag ef.

Any of the statements or comments made above should be regarded as personal and not necessarily those of the Welsh Government, any constituent part or connected body.

Sganiwyd y neges hon am bob feirws hysbys wrth iddi adael Llywodraeth Cymru. Mae Llywodraeth Cymru yn cymryd o ddifrif yr angen i ddiogelu eich data. Os cysylltwch â Llywodraeth Cymru, mae ein [hysbysiad preifatrwydd](#) yn esbonio sut rydym yn defnyddio eich gwybodaeth a sut rydym yn diogelu eich preifatrwydd. Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn anfon ateb yn Gymraeg i ohebiaeth a dderbynnir yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi. On leaving the Welsh Government this email was scanned for all known viruses. The Welsh Government takes the protection of your data seriously. If you contact the Welsh Government then our [Privacy Notice](#) explains how we use your information and the ways in which we protect your privacy. We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

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.

Privileged/Confidential Information may be contained in this message. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email. Please advise immediately if you or your employer does not consent to Internet email for messages of this kind. Opinions, conclusions and other information in this message that do not relate to the official business of the Council of the City and County of Cardiff shall be understood as neither given nor endorsed by it. All e-

mail sent to or from this address will be processed by Cardiff County Councils Corporate E-mail system and may be subject to scrutiny by someone other than the addressee.

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.

Mae'n bosibl bod gwybodaeth gyfrinachol yn y neges hon. Os na chyfeirir y neges atoch chi'n benodol (neu os nad ydych chi'n gyfrifol am drosglwyddo'r neges i'r person a enwir), yna ni chewch gopio na throsglwyddo'r neges. Mewn achos o'r fath, dylech ddinistrio'r neges a hysbysu'r anfonwr drwy e-bost ar unwaith. Rhowch wybod i'r anfonydd ar unwaith os nad ydych chi neu eich cyflogydd yn caniatáu e-bost y Rhynggrwyd am negeseuon fel hon. Rhaid deall nad yw'r safbwyntiau, y casgliadau a'r wybodaeth arall yn y neges hon nad ydynt yn cyfeirio at fusnes swyddogol Cyngor Dinas a Sir Caerdydd yn cynrychioli barn y Cyngor Sir nad yn cael sel ei fendith. Caiff unrhyw negeseuon a anfonir at, neu o'r cyfeiriad e-bost hwn eu prosesu gan system E-bost Gorfforaethol Cyngor Sir Caerdydd a gallant gael eu harchwilio gan rywun heblaw'r person a enwir.

CABINET MEETING:10 OCTOBER 2019

NATIONAL DEVELOPMENT FRAMEWORK

STRATEGIC PLANNING & TRANSPORT (COUNCILLOR CARO WILD)

AGENDA ITEM: 11

Reason for this Report

1. The purpose of this report is to set out a proposed Cabinet response to the Welsh Government's National Development Framework 2020-2040 Consultation Draft.

Background

2. The National Development Framework (NDF) is a new development plan which will set the direction for development in Wales from 2020 to 2040. It is being prepared by the Welsh Government and will represent the highest tier of statutory development plans in Wales.
3. It will provide a framework which will be built upon by Strategic Development Plans (SDPs) at a regional level and Local Development Plans (LDPs) at a local authority level. SDPs and LDPs will be required to be in conformity with the NDF.
4. The NDF is a spatial plan which means that it sets a direction for the future provision of infrastructure and development. It does not allocate exact locations for development but, in the case of SDPs, sets out the policies and key issues the WG requires the regions to take forward.
5. The Well-being of Future Generations (Wales) Act 2015 influences the content of the Plan which seeks to maximise contributions to the well-being goals and well-being objectives. The NDF also gives a spatial expression to Welsh Government policies of national importance and is intended to be read alongside 'Planning Policy Wales' (PPW), which provides planning policy on an all-Wales basis.

Issues

6. A copy of the Consultation Draft NDF is included in Appendix1 of this report. The front portion of the document outlines the scope of the NDF

and sets out 11 overarching ambitions based on national planning principles and sustainable placemaking outcomes as outlined in PPW.

7. This is followed by the NDF Spatial Strategy which sets out a guiding framework for where large scale change and nationally important developments will be focused over the next 20 years. It contains a Spatial Strategy Key Diagram along with 15 policies based on 3 components:
 - Where in Wales growth should be focused
 - How growth should be planned and managed
 - How we should power and heat places using renewable energy
8. Particular attention is drawn to the final section of the document which sets out policies for the three regions in Wales including 6 policies relating to South East Wales. Relevant extracts from policies and their supporting justification set out below:

Policy 27 – Cardiff

Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night time economy and finance. The Welsh Government supports regional development which addresses the opportunities and challenges arising from Cardiff's geographic location and its functions as a Capital City. The Welsh Government supports Cardiff's status as an internationally competitive city and a core city on the UK stage.

Policy 28 – Newport

The Welsh Government supports Newport as the focus for regional growth and investment and wants to see the City play an increased strategic role in the region. The strategic emphasis should be focussed on achieving growth in the city. Strategic and Local Development Plans across the region should recognise Newport as a focus for strategic housing and economic growth; essential services and facilities; transport and digital infrastructure; and consider how they can support and benefit from Newport's increased strategic regional role. Development in the wider region should be carefully managed to support Newport's growth and to provide a focus for regional planning. The Welsh Government will work with authorities within the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport and the wider region.

Policy 28 supporting text:

- *Cardiff is currently experiencing a period of growth in population and employment, but the city cannot continue to expand indefinitely without major consequences for the environment. It is a compact city nearing its physical limits, which include Caerphilly and Garth mountains to the north and the Bristol Channel to the south. Cardiff must generate and support regional growth throughout the south east while enhancing its status as a vibrant capital city of Wales.*

- *The Strategic Development Plan will need to consider the interdependence between Cardiff and the wider region. Regional transport infrastructure reflects the significance of Cardiff and has consolidated its role as the main focal point of the region. The potential to reach central Cardiff quickly and conveniently using the Metro generates opportunities for development in settlements outside the city. The cultural and economic strength of Cardiff must generate region-wide prosperity and well-being.*
- *The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region. It has significant brownfield development opportunities to provide new housing and employment areas. There are emerging highly skilled employment opportunities in the transport and digital communications sectors which should be catalysts for further economic investments. The Metro will improve the city's public transport system, especially within the city and to surrounding towns. It benefits from established road and rail links with Cardiff, Bristol and London.*
- *Growth at Newport will help manage the development pressures in Cardiff and provide a strategic focus for the eastern part of the region. Strategic growth should be focussed in and immediately adjoining Newport itself, to support brownfield regeneration.*

Policy 30 – Green Belts in South East Wales

The Welsh Government requires the identification of green belts through a Strategic Development Plan to manage urban form and growth in South East Wales, particularly around Newport and the eastern part of the region.

Regional plans should consider the relationship of any new green belts with the green belt around Bristol.

Policy 30 supporting text:

- *Strategic decisions on the location of development, key services and infrastructure should support the region's cities and Valleys communities and be taken on a regional basis, ensuring they are located in the most accessible and sustainable locations within the context of the whole region. The Welsh Government supports the use of green belts in the South East region in managing and planning urban growth. Planning Policy Wales sets out the policy context for them. 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*

Cabinet response

9. The Cabinet 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.
10. Of particular relevance to Cardiff are statements which recognise and support the key role played by cities and large towns by:
 - Encouraging sustainable and efficient patterns of development
 - Co-locating homes with jobs and vital services and the efficient use of resources
 - Focussing on cities and large towns as the main development areas
 - Creating concentrations of jobs, services and amenities
 - Creating a critical mass to support and sustain good public transport services and encourage active travel
11. For this approach to function effectively however, the National Development Framework must be informed by, and respond to, the major demographic, economic, housing and transport trends across Wales. This is particularly relevant for Cardiff, given that its size and scale is of regional and national significance.
12. 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.
13. For example, Policy 28 recognises the capital city's growth but 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.

14. The National Development Framework 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.
15. 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 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 outlines in paragraph 12 through seeking to support the Cardiff’s population and economic growth, and the unique role the city economy plays in the national economy, whilst ensure that the benefits of this growth are felt across the wider Capital Region.
16. 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.
17. The Council is very concerned that the statements above (para 8) appear in the Framework devoid of reference to any evidence base. It is in the Council’s view considered inappropriate for the National Development Framework to include unqualified statements, for example relating to Cardiff’s growth potential, in the absence of robust evidence in the form of urban capacity studies and other relevant data that would be expected in the development of LDPs and in any future SDP. Given the role that the National Framework will play in informing both the Strategic Development Plan and Local Development Plans it is imperative that it is underpinned by the same rigorous and detailed evidence base expected at local and regional levels. The Council is concerned that this is not currently the case.
18. This report in the main limits our comments to those parts of the NDF dealing directly with Cardiff. Nevertheless, we have significant concerns about other aspects as well. These derive broadly from the incompatibility

offhaving an evidence-weak NDF which would in turn form the basis of SDPs an LDPs which must be evidence-led. We reserve the right to make further comments as appropriate on aspects beyond Cardiff.

19. The Council would also argue strongly that the proposals such as those in Policy 28 do not belong in a National Development Framework, but is instead a decision for Strategic and Local Development Plans.
20. 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.**
21. Cardiff Council 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.

Reason for the Recommendation

22. To set out a proposed Cabinet response to the Welsh Government National Development Framework Consultation Draft 2020-2040.

Legal Implications

23. The report refers to a proposed response to the Welsh Government's NDF Consultation Draft. The decision about these recommendations has to be made in the context of the Council's public sector duties under the Equalities Act 2010 (including specific Welsh public sector duties) – the Public Sector Equality Duties (PSED). These duties require the Council to have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of 'protected characteristics'. The 'Protected characteristics' are: • Age • Gender reassignment • Sex • Race – including ethnic or national origin, colour or nationality • Disability • Pregnancy and maternity • Marriage and civil partnership • Sexual orientation • Religion or belief – including lack of belief.
24. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.
25. In discharging its duties under the Act, the Council has set and published well-being objectives designed to maximise its contribution to achieving the national well-being goals. The well-being objectives are set out in Cardiff's Corporate Plan 2019-22 <http://cmsprd.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/Corporate-Plan/Documents/Corporate%20Plan%202018-21.pdf> When exercising its

functions, the Council is required to take all reasonable steps to meet its well-being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well-being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.

26. The well-being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:

- Look to the long term
- Focus on prevention by understanding the root causes of problems
- Deliver an integrated approach to achieving the 7 national well-being goals
- Work in collaboration with others to find shared sustainable solutions
- Involve people from all sections of the community in the decisions which affect them.
- The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link: <http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

27. The Council has to be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards when making any policy decisions and consider the impact upon the Welsh Language, the report and Equality Impact Assessment deals with all these obligations. The Council has to consider the Well Being of Future Generations (Wales) Act 2015 and how this strategy may improve the social, economic, environmental and cultural well-being of Wales.

Financial Implications

28. There are no direct financial implications arising from this report with the response and further dialogue in connection with the Welsh Government National Development Framework consultation being completed using existing resources.

Human Resources Implications

29. There are no HR implications for this report.

RECOMMENDATION

Cabinet is recommended to approve the proposed response to the NDF Consultation Draft as set out in paragraphs 9-20 of this report and seek further dialogue with WG to address the issues raised.

SENIOR RESPONSIBLE OFFICER	ANDREW GREGORY Director of Planning, Transport & Environment
	4 October 2019

The following Appendix is attached:

Appendix 1 – Consultation Draft National Development Framework 2020-2040