

From: [Roberts, Lisa](#)
To: [NDE](#)
Subject: CONSULTATION ON DRAFT NDF
Date: 08 November 2019 14:26:18
Attachments: [image001.jpg](#)
[image003.jpg](#)
[NDF consultation draft _response of Swansea Council Novermber 2019.pdf](#)

Thank you for the opportunity to participate in the consultation process for the draft NDF.

Please find attached a response from Swansea Council.

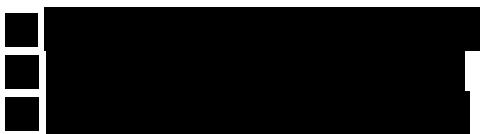
Kind Regards

Lisa

Lisa Roberts

Technegydd

Technician



Mae'r e-bost hwn ac unrhyw ffeiliau a drosglwyddir gydag ef yn gyfrinachol ac at ddefnydd yr unigolyn neu'r corff y cyfeiriwyd hwy atynt yn unig. Os ydych wedi derbyn yr e-bost hwn drwy gamgymeriad, dylech hysbysu'r gweinyddydd yn y cyfeiriad canlynol: gweinyddydd@abertawe.gov.uk

Bydd yr holl ohebiaeth a anfonir at y Cyngor neu ganddo yn destun cofnodi a/neu fonitro yn unol â'r ddeddfwriaeth berthnasol

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.


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We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

Consultation Response Form

Your name	Phil Holmes Head of Planning and City Regeneration Swansea Council
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Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	Swansea Council

Note:

The draft NDF introduces the proposed concept of Wales having three strategic planning Regions. The Swansea administrative area is situated within a region defined as 'Mid and South West Wales', which is abbreviated to MSWW in the Council's answers to the structured questions in this response.

Notwithstanding the Council's references to MSWW in its answers, the Council has made clear in its representations that it considers a South West Wales (SWW) Region to be a more appropriate strategic planning Region (see responses below). As such, references to MSWW in the Council's response do not represent an endorsement/acceptance of this concept.

1. NDF Outcomes (chapter 3)

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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

The Council fully supports and welcomes the principle of the Welsh Government's (WGs) aspirations to replace the Wales Spatial Plan with a new, national development plan, in order to give proper status to the Country's key strategic aims and planning principles. It is right that regional and local strategies should emanate from such a national development plan. It is considered however that the stated Outcomes in the draft NDF are, overall, somewhat lacking in ambition and distinctiveness, and below the level of what would be expected for a truly visionary national planning document that could act as a driver for the new strategic planning agenda coming emerging across Wales. Whilst it is absolutely right that this first national framework for Wales should be appropriately balanced - in terms of ensuring its aspirations are deliverable - the over-riding impression is that the targets are pitched below what is expected, when considering what a 20 year term Plan could aspire to achieve. The Council considers that transformational change in some areas of policy and planning delivery is possible over such a timeframe. This can be achieved if the NDF clearly sets out the terms of a supporting framework to embed a shared agenda amongst national government, local government, partnership agencies and the private sector. The NDF should offer a bolder vision and set of Outcomes on this basis.

Further to the above, the Council also considers it questionable that the 11 statements on pages 20 and 21 of the draft NDF can in fact be appropriately described as 'Outcomes'. A number of these (such as No.'s 3 and 9) would appear to be more accurately described as 'Objectives' or 'Aspirations', i.e. they don't describe an end state. The wording should be re-visited to ensure the Outcomes Approach (which is an approach that this Council does support in principle)

provides clear goals of attainment. These Outcomes should be direct statements of what the NDF considers Wales should actually be like by the end of the 20 year Plan Period as a result of the policies in the NDF being delivered.

Some specific points on the stated 'Outcomes' include:

- No. 1 appears to be the Outcome most related to placemaking, however the statement made are very high level and it does not specifically use the term 'placemaking. This is a significant omission given the concept is such an over-riding principle of the planning system in Wales, and that placemaking underpins all that we do. It is disappointing that, rather than featuring a clear statement about achieving an end state of new neighbourhoods and places being created that incorporate the key attributes of successful placemaking (in its widest sense), Outcome 1 defaults to the more generic, less tangible and often repeated terms of 'well located, accessible and high quality' development. These are terms used for decades in policy and are insufficiently clear to provide a useful basis to underpin decision making and embed a new era of placemaking and planning in Wales
- No.2 the Outcome relating to Supporting rural areas should specifically address/acknowledge rural transport issues and connectivity of sustainable transport between rural and urban areas. Whilst connectivity from rural areas to travel to large towns is addressed in No.5, sustainable transport connectivity is equally essential for rural areas to attract and retain people.
- No. 4 is a clear and ambitious target to increase welsh speakers, which is good to see. It is a continuing frustration however that both the NDF and PPW are quiet on how this can be best achieved through the development process
- No.5 could be expanded further to include references to leisure growth and opportunities, and the role such facilities can play in creating and sustaining vibrant centres I the future, particularly given the huge changes that have occurred in the retail sector.
- No 6 appears the outcome most related to increasing prosperity, however it is incongruous that it begins with a reference to development plans being the mechanism for delivering this. Dev plans will be a potential mechanism to facilitate all the outcomes (alongside many other mechanisms, interventions and national policy approaches), so it is not clear why dev plans are mentioned just in relation to this outcome. Instead No. 6 should contain a clear statement on what is the desired outcome in terms of delivering places capable of supporting increased rates of investment and productivity
- No.7: should there not be a clearer reference to Active Travel and Public Transport being given priority in placemaking terms (as per the clear approach in supporting national guidance), and that new areas of development should be required to specifically facilitate greater choice in the use of fast convenient and attractive travel by PT and AT
- No.8: very descriptive about broadband investment and does not read as an outcome that can be facilitated by development. Too high level and non-committal. It also focuses on investment to improve services rather than access

– and yet Section 2 of the NDF “Challenges & Opportunities” outlines that whilst current high speed cover for 94% of the country only 38% of homes are using it. This matter should be acknowledged and a target to increase use included.

- No.9: Acknowledge that objective 10 relates solely to biodiversity. However, it is important that the reference to “natural resources” in objective 9 also highlights biodiversity as a natural resource. The objective should also refer to soil resources. Suggest amend objective to read “...minerals, **soils**, coast, water, forests, **biodiversity** and...
- General:
 - The Council would wish to see a specific outcome relating to the national objective for Wales’ 3 main cities – what is the envisaged outcome for these key growth focal points that will be critical to driving Wales’ ability to succeed on the international stage
 - Would also suggest there could be a role for specific outcomes for each Region too, from which the region specific policies can be drawn from later in the document
 - It is very surprising not to see an outcome specified in relation to the provision of affordable homes. There should be a clear outcome on this, with a target specified here or the policy, together with an explanation of how WG aims to support achievement, e.g. funding to improve viability.
 - The key role of tourism in Wales deserves its own individual outcome to emphasise what exactly is envisaged over the coming decades to maximise the role of this sector
 - Some aspects of the outcomes are evidently beyond the control of the planning system as currently structured, e.g. Broadband provision commitments and “...education authorities will lead in developing infrastructure to enable the [Welsh] language to develop....”. Should this be recognised in the introduction and should the outcomes state more on how the planning system will assist in the achievement of the outcomes? For example is it proposed that s. 106 agreements are used to achieve the proposals?

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...

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
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Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

The Council strongly maintains that the omission of a clear, positive policy on what is the highest priority overarching principle of good planning in Wales – i.e. placemaking - is a significant failing of the draft NDF. Whilst the explanations of what placemaking is, and its importance to the Welsh planning system, is set out in PPW, there remains a clear need for the first development plan for Wales to set out in unequivocal terms what exactly is the Government's strategic policy for ensuring new development accords with placemaking requirements, as set out in its supporting planning guidance. The Council considers that Policy 1 of the NDF should set out the terms of this placemaking policy and relate it to the roles and responsibilities of national government, local authorities, other public sector and the private sector in delivering these key aims. This lies at the heart of nation building that the NDF will provide the overarching Plan to guide and facilitate.

The broad objectives of Policy 1 and Policy 2 are reasonable and align with the guidance in PPW in relation to sequential preference for growth centres. The following wording is too loose however: *"Higher density and mixed use development on sites with good access to urban centres and public transport hubs, including new and improved Metro stations, will be promoted and supported."* The statement could have unintended consequences and needs to be amended/qualified to make clear this support relates to appropriate development - whether that be in terms of the design or type of use. For example, a proposal incorporating largescale retail use which could be described as having good access to urban centres or public transport may not be appropriate with respect to the 'town centre first' sequential test. The policy should encourage "vibrant" urban centres. The sub text should expand on what higher density means to various contexts, without being too prescriptive.

The town/city centre first approach for significant public service facilities (Policy 2) is welcomed for the potential regeneration effects this could yield by increasing footfall and spin off effects in centres. In terms of University/college and hospitals development, greater clarity should be provided in the supporting text on how the policy should be interpreted if the organisations propose to develop at a location which is part of or adjacent to an existing campus that is not within a town or city centre. This would be particularly relevant to the Bay Campus and the University Campus Expansion area allowed for in the Swansea LDP. The document could usefully seek to explain what "exceptional circumstances" could comprise? i.e. where

there are areas of identified need/ defined shortages in terms of access to services

There appears a reasonable opportunity to combine the content of Policies 1 and 2 into a single policy relating to the promotion of a sustainable approach to supporting growth at established town and city centres. This would mean there is no overall increase in the number of policies in the spatial strategy section, even if a new placemaking policy (as suggested above) is introduced.

To deliver the intentions of Policy 3, a culture change will need to be achieved within Public Bodies where all departments are in a position to work towards the longer term wider well-being goals, rather than be under pressure to maximise the capital receipt for plots of land.

2. 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.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Policy 5 encapsulates some elements of what will be required to meet the AH needs of the Country and its Regions, and the first sentence is indeed an important commitment to make in terms of WG directing funding as necessary. Over the lifetime of the NDF there is certainly going to be a need for a re-evaluation in how Government money is best directed to have the most impact in terms of increasing AH delivery.

Notwithstanding the above, the policy is fundamentally weakened and made ineffective by focussing just on the role of AH targets in LDPs/SDPs, plus 'exception site' AH led sites, as the mechanism to deliver the evidenced need. Local and Regional policy frameworks are only ever likely to facilitate delivery of the minority proportion of what will be the numerical need for affordable homes in Wales, and the NDF should acknowledge that. The evidence at local level through LDPs clearly shows this and has done for some time. A direct reference to acknowledging the important role of other mechanisms, such as Council led housing programmes and new funding opportunities to support a major uplift in RSL led schemes, is important. Also, the policy does not mention renewal, maintenance or the replacement/redevelopment of long established affordable

accommodation in poor condition.

The policy could be more specific in terms of referencing the AHSR and what is expected in terms of making public land available for affordable housing, such as whether there would be minimum levels of AH expected on these sites. The supporting text should be clearer in respect of the funding sources for AH and reference should be made on the interface with the other key policy area of reducing carbon emissions. It will be counterproductive not to acknowledge that zero carbon requirements could affect viability and could impact on the numbers of AH being built unless there is public sector intervention in the 'market mechanisms' that influence this.

Policy 5 refers to setting targets based only on the assessments of need, without a clear reference to the impact of financial viability. This is a stark omission, since any targets in LDPs/SDPs that are only based on what the need is (i.e. not adjusted to reflect the realities of financial viability) will not be met.

It is notable that the policy doesn't include any broad high level target number for delivery. The Council considers this target could be expressed as a target range or percentage range of all new homes delivered, in accordance with the evidence. The NDF at page 30 references the findings from WG Estimates of Housing need [i.e. that this shows nationally 47% of additional homes should be affordable], however the policy does not appear to suggest this is the target to be delivered. If it is then this should be much clearer, and the NDF will have to be far, far more ambitious and wide ranging in terms of setting out a national strategy to achieve this, since there is absolutely no evidence that such a target could be achieved by the mechanisms set out in Policy 5. Viability evidence will limit the average across Wales to be far more closer to 10-20 % affordable being provided on typical private led sites, with large variations below and above these proportions depending on whether an area is a 'hotspot' (limited in scale across Wales) or in some cases an entirely unviable area to deliver any AH on private developments.

The requirement in the policy to identify sites for affordable housing led developments is welcomed. This promotes an approach successfully built into the Swansea LDP, however in terms of unit delivery the numbers will be comparatively small.

The reference to housing needs studies being produced regionally, which Authorities in the MSWW area are already doing, is broadly supported, however there needs to be clearer acknowledgement of the difficulties and challenges posed by joint working in such a diverse region with contrasting housing markets (see comments on policies 23-26 for the MSWW region below). If these are to be successful Regional Market Assessments there needs to be greater clarity from WG on the processes and methodology to be followed and data sets to be used to ensure consistency in approach. The recommendations from the AHSR and the WG intention to review the processes, guidance and data sources used within the LHMA by autumn 2020 will be key to this.

While it is recognised that estimates of need will be updated regularly as the Plan period progresses, the WG estimate of need does not extend to the end of the NDF plan period.

The Council is aware there will be updated demographic projections in 2020. Will the estimates of need be updated against these new demographic projections before the NDF is published?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
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<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

The Policy sets out a generally useful statement of intent, in terms of working in partnership to achieve the aim, however it clearly lacks detail and potential actions. To a large extent this is understandable given the technology is developing so rapidly, in relative terms.

Given the positive contribution that Electric Vehicles are expected to be able to make to the decarbonisation agenda, it would be good to see the NDF being more specifically integrated with the Environmental (Wales) Act 2016 and the Wellbeing of Future Generations (Wales) Act (2015). <https://futuregenerations.wales/work/decarbonisation/> on this aspect

Whilst Hydrogen fuelled vehicles are in an earlier phase of development and emergence when compared with electric vehicles, this is a fuel technology which may benefit from a specific mention. One of the greatest barriers to uptake of hydrogen powered vehicles is sourcing reliable refilling stations. The Council considers that this something the NDF could provide a clear supporting framework for, given the prospect of hydrogen fuelled vehicles having a greater potential range and shorter refilling cycle than that of electric.

5. Green Infrastructure (policies 8 & 9)

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

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

solar developments							
District heat networks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 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?

Q5. Green Infrastructure

Policy 8 will serve to embed the s6 Duty into the national, strategic and local planning framework, which is welcomed. The Council also supports the increased focus at the strategic level on increasing the emphasis on the importance of securing biodiversity enhancements as part of delivering sustainable growth.

There is some concern however that the policy puts significant weight on the process of producing Area Statements, which are a concept that is still 'work in progress', and that are intended to identify all strategic networks and priority areas for action. Particularly as these areas will become material considerations and will require to be safeguarded in SDPs and LDPs, and will therefore have significant consequences for the identification of future areas of growth.

It is unclear what status safeguarded priority areas have in the existing framework of ecological designations? There is already a comprehensive framework of national legislation and policy which protects biodiversity. How will these safeguarded areas be considered in GI assessments and ecological appraisals?

It is not clear what Policy 8 will actually achieve in practice – other than instructing the SDP and LDP to refer to the Area Statements, and consider whether to include these areas as safeguarding. Is it significant that the text refers to "Should" and not "must", i.e. is the policy strong/clear enough in this regard?

The Council supports the approach in Policy 8 to combine strategic green infrastructure and enhancement of biodiversity. The recognition of the relationship between maintaining and enhancing ecosystem networks and maximising nature based solutions in new developments is also supported. However, the supporting text does not fully reflect the content of the policy. The text is overly focussed on connectivity between designated sites and ecological networks. This is only part one of Policy 8. In order to support the second element of Policy 8, a wider concept of GI needs to be conveyed in the reasoned justification. This needs to provide sufficient reference to the opportunities to explore creation of a multifunctional strategic GI network through design of surface water drainage, open space and active travel routes within a development. This may extend beyond consideration of connectivity between designated sites. The text should be amended to provide better synergy with the placemaking approach to green infrastructure contained in PPW, and enable

the health benefits of GI and links to WBFG Act to be sufficiently highlighted.

Recognition/identification of the role AONBs/NPs have in the delivery of Policy 8 would be welcome.

The Council would request that the policy be amended to more accurately reflect the issue of biodiversity recovery and ensure that the concept of maintenance is referred to in the policy. The policy title should ideally be amended to “strategic framework for biodiversity **recovery**, enhancement and ecosystem resilience”

Suggest the text of the policy should be amended to..“to ensure the **maintenance**, restoration and enhancement of biodiversity....”“opportunities where strategic green infrastructure.....ecological connectivity **diversity** and connectivity, social equity....”
“In all cases, cumulative action towards securing the **maintenance, recovery** and enhancement of biodiversity

The policy should also be amended to clearly require that action towards securing biodiversity and ecosystem resilience needs to be demonstrated at an early stage of the planning process. Early consideration of issues is essential to achieve the required wholistic approach to placemaking and ensuring that we are able to negotiate for the most intelligent design solutions to address not just biodiversity, but GI, SUDs and wider climate change issues.

Suggest the final sentence of policy should read...“...should be demonstrated as part of the development.....**at an early stage**”

Final paragraph of supporting text of Policy 8 relates to woodlands, and would be better placed at the start of Policy 9 – National Forest.

In terms of Policy 9, a National Forest policy is a potential significant constraint and would most likely need to sit outside the Nationally Designated Landscape Areas as afforestation would likely conflict with the fundamental open landscape reasons for their designation. Unless there is connectivity between areas it is difficult to envisage how a dispersed forest could have a national identity. Would also question whether the policy could provide a loophole of sorts, supporting potentially unacceptable development in the open countryside on brownfield sites as long as there is tree planting. Any policy relating to this should emphasise that structured tree planting should be targeted at areas suffering from surface water/flooding problems.

Q6. Energy

The broad policy approach for wind and solar development is welcome, particularly the partnership working with the renewable energy sector and strategic approach to generate critical mass to achieve renewable energy infrastructure and increase grid capacity. The traffic light system provides a useful approach to how Policy 10 and 11 will be implemented. The focus on ensuring that energy developments bring economic, social and environmental benefits to communities is also supported.

The draft NDF does not, however, provide a sufficient national strategic context for

encouraging tidal energy projects, which has the potential to have a transformative effect and influence on Wales over the lifetime of the NDF. The Challenges and Opportunities section highlights that Wales can become a world leader in renewable energy technologies including the use of our tidal resources, however the only other reference to this technology in the NDF is the MSWW region having significant potential which regional/local plans should consider. This is a nationally significant opportunity, and there should be a national policy for tidal energy on the same level as that for wind and solar energy.

In light of the change to the threshold for the definition of large scale development, there is an overlap between the emerging NDF Wind and Solar Priority Areas (defined as 10MW+) and the Adopted LDP Local Search Areas (defined as 5-25MW onshore wind and 5-50Mw other – in line with TAN 8. We urge that TAN8 should be updated as soon as possible to align guidance in good time to support production of appropriate policy in SDP's and LDPs. In particular, clarity is required re the recommendations 6.30 of the Arup Study and the future intentions for the Renewable Energy Toolkit.

It is also unclear from the NDF and the Arup study whether further refinement of Priority Areas are required before inclusion in the LDP, and/or whether additional Local Search areas would be required to be shown in an LDP.

There is further overlap between the adopted LDP which identifies the TAN 8 SSA Area E for onshore wind energy, and the proposed Area 14 which extends beyond the boundary of Area E and now includes an area for solar energy. Conversely areas currently identified as LSA's for solar only, are now shown within the Wind and Solar Priority area.

Scale of maps provided in NDF and evidence base do not facilitate effective comparison with the Swansea LDP LSA areas.

The Policy does not provide any guidance on WG's position in the case of Priority Areas which overlap with Minerals Safeguarding Areas.

7. The Regions (policy 16)

- 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	<i>Don't know</i>	<i>No opinion</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

8. 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.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9. 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.

- 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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

10. 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.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

The notion of a Mid and South West Wales (MSWW) region being a coherent one for strategic planning purposes is highly problematic. Such a Region covers a vast land mass stretching to opposite ends of the Country, and includes Authorities that have significantly contrasting geographical areas, development priorities and character. This poses a huge challenge in terms of describing the Region as being any sort of cohesive entity in terms of making cross-boundary decisions on a collective basis. For example, unlike the other Regions, much of the MSWW Region is not a viable commuter area into the main urbanised growth area (Swansea) where substantial future investment will be focussed in order to drive future economic uplift and create significant new job opportunities.

A South West Wales (SWW) Region of Swansea, Neath-Port Talbot, Carmarthenshire and Pembrokeshire represents a more meaningful, coherent planning region.

The Council has made similar representations to Government consultations in this respect. This includes its response to the recent consultation on the WG document 'Improving Public Transport' White Paper (March 2019).

The four Councils in South West Wales have a long history of joint working, and share a greater amount of cross-border working than that with the Mid-Wales authorities. Mid-Wales authorities have previously shared in this same consultation a complementary view, that their predominant development needs and patterns differ from that of South West Wales. By having four regions instead of three (which would split South West and Mid Wales into separate areas) would not only support the distinctive characters of these geographical areas, but would also better align with the aims and programmes of the Swansea Bay City Deal.

The following points are made in relation to the specific policies:

Policy 16:

The bullet points included are broadly supported. Strategic areas for leisure growth and regeneration should be included in bullet point 6.

It will be important to ensure the bulleted items are consistent with the revised Development Plans Manual guidance – see paragraph 10.6 e.g. that describes a clear and deliverable vision for the SDP area and each constituent LPA; and coherent overarching strategy with clearly defined roles for places; and retail hierarchy” This is set out in the draft Manual but not in NDF Policy 16.

The wording of the first line of Policy 16 with regard to “.....and where required constituent LDPs” needs more explanation in the supporting text as to which criteria this applies to and the circumstances.

“Employment provision” should also state “and requirement” as this will need to be assessed regionally.

In-line with comments made by this Council and the MSWW Region on the draft Development Plans Manual it is considered that:

- the assessment of development viability is important at the regional scale in terms of evaluating the most appropriate places for development and establishing areas for strategic growth, and in practical terms for consistency of approach and sharing of officer expertise;
- whilst it is acknowledged that Gypsy and Traveller need (like general housing requirements) are not constrained by LPA administrative boundaries, it may be appropriate to assess with a consistent methodology across the region, and is certainly relevant to consider need for transit sites on a regional basis. It should be noted that each Council area is required to produce a GTAA under the Housing Act and it will be important for Local LA officers with established relationships to the families to be involved in assessing the need. Essentially, need should be determined on a consistent basis at the local level and feed up into a regional plan. Determining provision at a regional level will be problematic, although there is an argument that ultimately this approach could result in a more objective strategy for

meeting need. This will clearly require new ways of collective working and understanding that the NDF should recognise.

The Council welcomes the initial guidance provided on SDPs. It is acknowledged that it is stated within the Draft Development Plans Manual that relevant legislation and guidance will be in place in advance of the formal establishment of Strategic Planning Panel. A firm steer and guidance on the issue of governance and resourcing of SDPs will be key to bringing them forward. The supporting text states that progress on regional planning across Wales is required and will be monitored, but against what timescales?

We welcome the fact that reference to more national/regional based plans and strategies may need to be included – to acknowledge the recent growth in regional collaborative working amongst authorities and the new or updated studies/guidance to be referenced.

The policy is considered to be too weak on environmental issues. Bullets relating to SMNR and ecological networks do not sufficiently highlight the importance of addressing key WG environmental objectives at the regional level. For example the importance of renewable energy, reversing biodiversity loss and tackling climate change. The policy could be strengthened by adding the following strategic policy requirements:

- **A framework for achieving regional decarbonisation (including renewable energy and climate change resilience)**
- A framework for the sustainable management of natural resources to **deliver biodiversity recovery**
- Ecological networks and opportunities for protecting or enhancing the **multifunctionality and** connectivity of these networks, **including frameworks to address long term food security/sustainable food growing.**

Acknowledge that para 4 relates specifically to alignment with regional economic development plans. However, it is equally important that SDP's consider alignment with national and regional environmental strategies. Particularly those that form the policy framework for the sustainable management of natural resources under the Environment Wales Act 2016. Amend Policy 16, Para 4, first sentence to highlight important environmental strategies. Suggest new paragraph to address alignment with implications of NRAPs and the Climate Change Strategy at the regional level.

Policies 17 – 22 (6 in total) relate to the North West Wales Region.

Policies 23 – 26 (4 in total) relate to the MSWW Region [Detailed comments on these are set out below]

Policies 27 – 33 (7 in total) relate to the South East Wales Region

The MSWW Region Diagram (pg 57) is generally clear, but this is somewhat at the expense of showing much information at all regarding nationally significant issues/proposals for this vast area of Wales. It omits elements that are in the

national schematic map (page 25) for no obvious reason. The map would benefit from showing the AONB and National Parks. It should also highlight the significance of Swansea City Centre (by perhaps using a different or larger symbol on the key) as the focus for the Region in terms of city centre scale transformative growth (as should be the case for Cardiff and Newport in the SE Diagram). As per the comments on Q13 below, the intra-urban connectivity symbol on the diagram needs amending to demonstrate that this is intended to represent significantly enhanced connectivity infrastructure that goes into Swansea, which will be the major city centre growth area for the Region. Recommend that this annotation takes a curved or 'bended' form to illustrate this. The Metro symbol occupies a curious position and it is considered that it is problematic to illustrate this proposal just by means of a symbol at an arbitrary location within the region – as indeed is also the case for the South East Wales schematic map (on page 63). The MSWW Region Diagram shows no clear aspiration for enhanced connectivity between the south and north of the MSWW region.

Policy 23:

Policy 23 should be re-named to refer to the 'Swansea Bay and Llanelli National Growth Area, or alternatively 'South West Wales National Growth Area', in order to avoid the interpretation of the policy highlighting just Swansea and Llanelli as named areas (i.e. the omission of NPT). A similar re-naming strategy can be followed for the NGAs in the North and South East Wales Regions.

Policy 23 appears to set out a proposed settlement hierarchy, and yet Policy 16 of the NDF states that the settlement hierarchy should be identified in the SDP. Should the settlement strategy for the region not be based on the evidence base that would be prepared as part of the regional planning process to underpin the future SDP? The basis for assessing housing requirements is not clearly set out in the amplification to the policy. It states that the WG central estimates provide part of the evidence and context on which Housing Requirements for Strategic Development Plans can be based and should be considered at the regional scale.

Policy 23 and its supporting text appears to give Swansea, Llanelli, Port Talbot and Neath equal status as centres of national growth and does not acknowledge the clearly different character, role and function of the City of Swansea, as a city, and as being the driver of future growth and enhanced prosperity for the Region. A broadly equal status may be appropriate in terms of future housing growth, however the NDF will lack integrity if it does not recognise that Swansea City Centre has a distinct role in relation to certain types, scale and density of development e.g. retail, leisure growth, housing, major public sector development (defined earlier in the NDF), and certain office uses.

Supporting text to Policy 23 does not sufficiently recognise the role of the environment.

“The area can accommodate new growth in a planned, **environmentally sustainable** and co-ordinated way,....”

Additional Policy Requirements (#1-3):

#1 The Council strongly maintains that the NDF should contain an additional, individual policy that highlights the distinct role and function of Swansea, and particularly its City Centre, as the focus in the MSWW Region for the uses described above (and others), in order to re-inforce its role as the region's hub for growth, similar to how Cardiff is given a stand-alone policy and is given greater prominence than Newport in the SE region. The extensive regeneration proposals for the Swansea Central Area, in the heart of the city centre, are supported by Welsh Government and are enormously significant on a national scale, as well as regional. They are clearly distinct from the scope of the growth aspirations and levels of investment for towns such as Llanelli and Neath.

#2 An additional policy for the MSWW Region to highlight the future role of the designated National Parks and AONB is also considered necessary, which would lay the foundation upon which SDPs could build. These are highly significant, nationally designated areas, that are a distinguishing feature at a national scale, and the NDF has an important role in identifying the opportunities and responsibilities for these areas. Such Areas provide an opportunity for increasing tourism activity in a sustainable manner and a clear framework should be established in the national plan relating to the fundamental need to protect and enhance these areas as national assets. More broadly in relation to AONBs, whilst there is a scattering of references to AONBs in the document (e.g. p12 Challenges and opportunities talks about living landscapes), generally speaking the conclusions and recommendations of the Future Landscapes work that has been undertaken across Wales are not apparent in the draft NDF. Looking at NPs and AONBs together as the designated landscapes of Wales. AONBs and NPs are nationally important assets, designated for the benefit of the nation and to protect their unique landscapes. Their national importance is recognised and stated in Planning Policy Wales, so the Council suggests they should have the same national consideration in the NDF.

In the Council's view, the Minister has clearly stated the need for parity for AONBs with National Parks (NPs) in terms of status, profile and resourcing, and the Council's view is that AONBs are not profiled in the same way, e.g:

- NPs are shown on the very first plan – but not AONBs;
- NPs get referenced and named in the regional profiles but not the AONBs.
- Whilst both the National Parks and an AONB are identified in the regional profile for Mid and South West Wales, the overview description on p56 only mentions the National Parks.

#3 If Green Belts are to be identified for the other Regions of Wales, the NDF will require an additional Policy entitled 'Green Belt in Mid and South West Wales' to bring appropriate balance to the Framework, and to align the Region with the North Wales and SE Wales Regions in this regard. The NDF does not highlight a specific location for a Green Belt in the Region and yet the same provisions as stated in the North Wales Green Belt Policy (Policy 19) apply to MSWW as well i.e. that 'The Welsh Government supports the role of Strategic Development Plans identifying

and establishing green belts to manage urban form and growth in MSWW'. As such the omission of such a policy would introduce confusion and a lack of clarity as to the appropriateness of having a Green Belt potentially designated for the MSWW, if there is an apparent unequal treatment in the NDF between Regions on this subject. The Council would highlight that these comments have had to be made without the benefit of access to the range of evidence used by WG to identify the potential Green Belts that the NDF identifies for the North and SE Wales Regions.

Policies 24 and 25 relate to supporting growth in the established towns within Authorities beyond Swansea and the specific proposal for the Haven Waterway in Pembrokeshire.

The Council is aware that the other Authorities within the Region most directly affected by these policies have made detailed representations on the matters they raise.

Policy 26:

Policy 26 is clearly very high level and is no more than highlighting a commitment of government to work with agencies (does that include private sector?) to plan the Metro and to support growth that would capitalise on its delivery. Most fundamentally, the policy does not sufficiently clarify the nature of the proposed Swansea Bay Metro. The policy clearly needs to be more descriptive in terms of the scheme and the specific opportunity that it presents, and to give some description of the options available to deliver what would be a massive investment on a scale beyond anything seen for many decades.

The City & County of Swansea has provided the regional lead for the South West Wales Metro since the First Minister's initial announcement in December 2016. The exact form and content of the Metro continues to develop, but is expected to be an integrated bus and rail system, which promotes onward active travel opportunities from its key hubs.

The Metro project will enable a greater use of sustainable transport means to deliver improvements to network capacity, connectivity and poor air quality caused by vehicle emissions. The project will seek to consider how transport provisions can contribute to the aims of the Wellbeing of Future Generations (Wales) Act and the decarbonisation agenda to meet the needs of our growing populations.

The draft final preliminary rail report for the region has been completed as of September 2019. This work could provide some of the illustrations for NDF context. The bus concepts are however still being worked up and are unlikely to be publicly available until Q3 2020.

The Council welcomes its inclusion within the NDF in order to provide a solid policy footing for the project, and to establish its inclusion within the policy cascade down to the Local Transport Plan refresh expected in the coming years.

The Council would welcome however greater clarification for how the Welsh Government expects the Metro to sit within the policy context, and furthermore how

the Welsh Government intends to facilitate the proposals, and work with the relevant Councils to support its development and delivery over the coming years.

The final paragraphs set out under Policy 26 do not relate to the Metro and appear out of place in this location. The content of the paragraphs could form part of the rationale for the requested additional policy on National Parks/AONB/Natural Resources.

11. 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.

- 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.

12. 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.

- Do you have any comments on the Habitats Regulations Assessment report?

13. 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.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

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

- 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
 - 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.
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14. 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 NDF places a significant emphasis on energy policy. Whilst this matter is a key area of policy, the scale of emphasis given to energy feels out of kilter with other development priorities for the Country. Delivering a transformed transport system and addressing the major issues caused by a lack of inter-connectivity and the constraints to the network is, for example, just as critical (if not more so) in terms of the requiring a national framework and yet there is no overarching policy on this in Section 4 of the NDF.

The NDF would benefit on an individual policy relating to strategic infrastructure investment – highlighting that in some circumstances development aspirations will require national intervention to unlock regeneration and meet the wider aspirations of the NDF and SDPs. This includes key, nationally significant transport infrastructure. Whilst the detail of any such schemes may not be known, certainly the principle can be embraced and made clear, with connections made to the relevant national strategies such as the National Transport Strategy, National Infrastructure Plan, etc. There must be recognition that, whilst collaboration with the private sector will always be pursued as far as is possible, the public sector will have a key role in unlocking investment, particularly financially unviable areas.

The schematic map on page 25 generally achieves a good balance of identifying key issues and proposals whilst maintaining legibility. It is maintained however that the intra-urban connectivity symbol needs amending to demonstrate that these are intended to significantly enhance connectivity into the major city centre growth areas of Swansea and Cardiff. Recommend that they take a curved or 'bended' form and are clear that they go into these growth cities. In addition, the chosen annotation for National Growth Areas needs further thought as they do not come

through clearly enough. Suggest the NGA annotation for the MSWW area does not go into the AONB. Swansea and Newport should have a City dot on the map like Cardiff.

The NDF indicates that a combination of a SDP and one or more Joint LDPs will be appropriate for the MSWW Region. It states that the Welsh Government will support approaches that define and focus on sub-regions, rather than a single full region, where it is demonstrated this is appropriate. It is considered likely that a SDP for the MSWW Region would generally cover the main built up areas in the region, which requires the more built up areas of Carmarthenshire and Pembrokeshire being 'detached' from the rest of those Counties to be considered in detail within an SDP. The text mentions joint LDPs, however it is not clear what role the NPAs are anticipated to have in the region and would it be permissible for them to prepare individual LDPs?

The Council's responses above set out the need for a specific outcome relating to tourism, and that there is a lack of policy emphasising the importance of developing strategies/policy to facilitate tourism development (balanced against the landscape protection priorities) in the national and regional interests. The Council would highlight the importance of this for a number of reasons, including:

- Nationally, a new Tourism Strategy for Wales has identified a vision which is "To grow Tourism for the good of Wales"
- Across Wales Images of our natural environment including our coastline, National Parks and Areas of Outstanding Natural Beauty, coupled with the changing cityscape and major event programmes are used to change perceptions of Wales to the world. Therefore creating a strong and positive brand for Wales in a very competitive marketplace for tourism, inward investment and indigenous business growth.
- The economic, environmental and health benefits that tourism and the visitor economy can bring to a community, a destination and a country cut across many of the 7 goals of the Welsh Assembly Governments Well-being of Future Generations Act
- Locally, the natural environment is a key driver in the visitors decision making process when choosing Swansea. Both promoting, developing and safeguarding the destinations assets are vital for the long term sustainability of many communities.

Given the above, the NDF has an important role to recognise and acknowledge the role and benefits that a vibrant domestic Tourism and the Visitor Economy brings to people, places and business in Wales.

Finally, to re-iterate the fundamental issues of defining Wales' regions, the proposed arrangements to combine mid and south-west Wales are not considered ideal for any of the six constituent councils. There is a collective preference to separate the four south-west authorities from the two in mid Wales to reflect their own socio-economic geographies. The arrangements for South West Wales would deliver better and more coherent regional strategic planning for housing, economic development, transport and health. There would be potential financial benefits via cost reduction and WG incentives. The scale, power and sphere of control of the collaboration would constitute an improved inward investment offer. There would

be greater consistency of governance than the ad hoc current arrangements. We would secure greater freedom from regulation and the general power of competence.

15. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

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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