

**Date:** 13<sup>th</sup> November 2019  
**Our Ref:** LF/MG/19.8060

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NDF Team  
Planning Policy Branch  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

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Dear Sir/Madam,

**Draft National Development Framework (NDF) 2020-2040 – Public Consultation**  
**Representations on behalf of The Stevens Family, The Old Rectory, Porthkerry, CF62 3BX**

On behalf of our clients, The Stevens Family of The Old Rectory, Porthkerry, Boyer is pleased to provide comments in response to the draft National Development Framework (NDF). In particular, comment is herewith provided in relation to draft Policy 32, which addresses the function and development of Cardiff Airport.

**Policy 32 – Cardiff Airport**

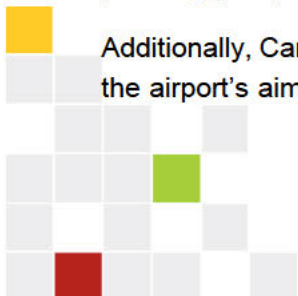
We do not object to the principle of supporting the growth of Cardiff Airport. However, although the political importance of the airport and the perception of Wales having an international airport is recognised, statements such as the airport being a 'key driver' within the Welsh economy are simply not supported by evidence.

In relation to the adjacent Cardiff Airport Enterprise Zone, the draft policy states that development will be supported "...where it supports the functions of the airport". In this regard, an outline planning application has been submitted for a 45ha business park comprising Class B1/B2 and B8 uses on land at Port Road, Rhoose, which is currently awaiting determination by the Vale of Glamorgan Council (Ref: 2019/00871/OUT).

However, from reviewing the current proposals, there is no reason to suppose that the proposed development would 'support the functions of the airport' as, due to the open nature of the proposed use classes, there is no certainty that the facilities will be taken up by, or even attractive to, aerospace or related industries. It is therefore not only possible but, given the lack of substantial market interest from prospective operators, likely that the proposals for open Class B1/B2 and B8 business uses would not contribute in any way to the functions or viability of Cardiff Airport.

As the NDF will form part of the Development Plan, it is therefore considered that reference to development of the Enterprise Zone should be removed as this would not support the function or growth of the airport and, as a Local Development Plan allocation, should not be addressed by national planning policy.

Additionally, Cardiff Airport has previously published the 'Our Airport 2040 - Masterplan', which set out the airport's aims of increasing passenger turnover to around three million by 2036. The Masterplan



also includes plans for a new terminal building, additional airport facilities, a transport hub and an 'Airport City' comprising new aerospace industries within the Cardiff Airport Gateway Enterprise Zone. However, this document currently has no statutory status.

Although we note that representations in general support of the application have recently been submitted on behalf of the Welsh Government and Cardiff Airport, comments have been submitted by Boyer on behalf of The Stevens Family setting out a number of significant concerns regarding the proposals, as well as the Cardiff Airport Masterplan. These concerns including potential sustainable transport links, in particular, the potential of a new rail connection.

In this regard, although the importance of reducing carbon emissions by encouraging sustainable transport are recognised, the provision of a rail link would require significant earthworks in order to 'cut and fill' a potential route due to the topography of the land. This, in combination with the direct provision of new rail infrastructure would represent enormous financial costs, as well as 'hidden' carbon costs from the production of heavy-duty steel and concrete sleepers.

Moreover, rail users can already access the airport via Rhose-Cardiff International Airport rail station, which is connected by a direct shuttle to the airport's terminal just 1.5km to the north-east. This also has the benefit of providing rail access from Swansea and to the west, as well as Cardiff and to the east, while the potential rail link would only allow access from an easterly direction, where the airport's catchment strongly conflicts with that of Bristol Airport.

If you require anything further, please do not hesitate to contact me.

Yours sincerely,



**Michael Gooch**  
**Senior Planner**

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## Consultation Response Form

Your name	
Your address	
Preferred contact details (email/phone/post)	
Organisation (if applicable)	

## 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?

[illegible]

- 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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## 2. 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>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 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:

### 3. 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 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?

### 4. Mobile Action Zones (policy 6)

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

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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

### 5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

[illegible]

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

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## 6. Green Infrastructure (policies 8 & 9)

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

[illegible]

## 7. 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...

[illegible]

- 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?

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## 8. 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?

[illegible]



## 11. 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 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.

## 12. 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.

### 13. 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?

### 14. 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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### 15. 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?

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### 16. Are you...?

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

<b>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</b>	<input type="checkbox"/>
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