

Cynulliad Cenedlaethol Cymru
Y Pwyllgor Newid Hinsawdd,
Amgylchedd a Materion Gwledig
Fframwaith Datblygu Cenedlaethol
Cymru
NHAMG (5) NDF 05
Ymateb gan Cyngor Sir Ceredigion

National Assembly for Wales
Climate Change, Environment and
Rural Affairs Committee
National Development Framework
CCERA(5) NDF 05
Evidence from Ceredigion County
Council

Ceredigion County Council, and member of Planning Officers Society Wales (POSW):

Thank you for the opportunity to present evidence to the Committee. This is a short written submission summarising my views on the consultation version of the Welsh Government's National Development Framework (NDF).

I welcome the progress made to replace the Wales Spatial Plan with a statutory National Development Plan the NDF: there remains a continuing requirement for local Planning Authorities to evidence conformity of an emerging Local Development Plan with the Wales Spatial Plan, most recently updated more than 10 years ago and predating the Welsh Government's suite of Planning and related primary legislation in 2015-16.

I disagree fundamentally with NDF division of Wales into three regions, not four. I cannot overstate the importance of the previously made case for Mid Wales to be recognised as a discrete region with distinct characteristics that are very different to those of South West Wales. Tying the future of Mid Wales into the economic ambition of the Swansea City Deal would confound the emergence of an independent voice for a very different and transformational economic agenda founded on the Mid Wales Growth Deal and on the qualities of Mid Wales.

Recognition is needed of the strategic planning issues across mid Wales, as being very distinct and different to those pertaining to south west Wales, the M4 corridor and in particular to a potential SDP for the Swansea City region, likely to encompass Neath Port Talbot, Swansea, Carmarthenshire and possibly Pembrokeshire.

I consider that mid Wales needs an agile and flexible planning policy framework that embraces / enables some of the economic and technological opportunities rather than put in too rigid a stance that looks to focus development in areas where traditionally there has been growth. With a time span to 2040 the NDF needs imagination, flare and flexibility in identifying the opportunities of the future, for some of which the locations of past and current enterprise may not be the right locations, to be open to new technologies not yet thought of, technologies of the future.

So for example, you'd expect an NDF to set out how Wales will achieve climate change and develop its infrastructure and energy etc, but not go into detail about where all development ought to take place. Future growth may be more opportunistic and be based around clear air (radio spectrum technology), around the coastline (tourism and harbour development) and around land (agri food / food development and manufacturing). These sectors may well be the transformational ones as far as mid Wales goes and are not typical in terms of everything being focused on a major town.

I am however disappointed at missed opportunities, with evidence to support the outcomes patchy:

- To embed spatial analytics into the Plan: there is a wealth of information in the background evidence that has not been translated into emerging spatial policy within the NDF Consultation Draft. There is a lack of detail in drawing on spatial evidence to better understand how the NDF could inform and encourage improved economic, environmental and social outcomes. More nuanced analysis and interpretation is needed of infrastructure, physical and digital, improved connectivity to grid identifying strengths and the need to improve transport connectivity;
- To consider a positive future for rural Wales: there is a paucity of policy within the Mid and West Wales region to encourage the appropriate economic growth, improved transport and ecological connectivity of Mid Wales, founded on the area's quality environment and recognising the need for investment and the strategic opportunities that this plan should be identifying;
- lack of detailed proposals at a national / overarching level relating to meeting the Government's commitments to protecting and growing the Welsh language through planning;
- current lack of detail on the reach and purpose of the National Forest and Mobile Action Zones
- Insufficient detail is provided on the concept of 'National Forest'
- Further detail is needed on the relationships between the NDF and
 - the Welsh National Marine Plan, to ensure positive and strategic planning for the coastal environment / economy / community.
 - The Infrastructure Investment Plan and the emerging Infrastructure Bill
 - The road and rail network;

I have concerns that the Consultation Draft is misleading in that, in seeking to direct rapid growth to the three identified strategic growth areas of Wales, it fails to focus on the likely consequences of such growth on those areas outwith the growth areas, and, in so doing, may result in intensifying rather than ameliorating existing spatial inequalities, for example in terms of depopulation / increasingly skewed demographics, economic opportunities, health and educational opportunities.

