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4th October 2019

e-mail response sent to: SeneddCCERA@Assembly.Wales

Dear Sir/Madam

Climate Change, Environment and Rural Affairs Committee Scrutiny of the Draft National Development Framework (NDF)

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

RTPI Cymru welcomes the publication of the draft National Development Framework (NDF) and support its intentions. RTPI Cymru has long called for a spatial plan to enable Wales to make effective decisions on important national issues relating to housing, climate change, energy generation, the economy etc. and a spatial framework for investment, other government policy, Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

We hope the NDF will provide the context and evidence for taking difficult national decisions and inform long-term investment goals, which will enable infrastructure decisions to be better integrated to support existing and new development while taking into account climate change mitigation, adaptation and sustainable outcomes.

We recognise the challenge of having to achieve a sustainable pattern of development for the longer term, with the 20-year time constraint of the plan, while taking into account the climate change agenda that requires us to look beyond the 20-year horizon and develop policies to achieve a longer-term objective for an uncertain future.

However, we feel an opportunity to push boundaries in the longer term planning for Wales and in taking action against climate change has not been fully grasped. The draft NDF is a welcome start, showing there is a clear intent to tackle climate change, but this needs to be

backed up with stronger evidence and detail. In order to start to address the issues surrounding climate change, RTPI Cymru believes that we need a behavioural change across the industry in the way that we approach planning and developing the places we live, work and enjoy. The NDF is the document which can guide that change and we urge Welsh Government to be bolder in its approach to long term planning for Wales.

It is vital that the NDF explicitly links to the Wales Infrastructure Investment Plan and other Government policy which have spatial implications.

A table setting out the links and relationships between the relevant plans, such as Strategic Development Plans (SDPs) and Local Development Plans (LDPs), would provide clarity to all stakeholders and help engage those important sectors and stakeholders that sit outside of planning. It is also therefore important that all plans, strategies, policy and guidance are kept updated. Many strategies and guidance documents such as the Wales Transport Strategy, are not currently up to date.

While we support Welsh Government's work on decarbonisation, RTPI Cymru believes that we need to look beyond where people live and carbon emissions and also address the wider issues of climate change. The focus on decarbonisation in the NDF feels too narrow, for example the NDF does not fully tackle flood risk and coastal change given there will be a significant impact on some settlements from future rising sea levels.

Spatial Strategy

The draft NDF is described as a spatial plan but it is only spatial for some topics, such as growth areas, onshore wind and solar, district heat networks etc. Yet other potentially spatial policies (e.g. Mobile Action Zones, biodiversity enhancement, national forests etc.) it appears to set aside for a later date, stating the Welsh Government "will identify" areas/sites.

There is inconsistency in the detail throughout the document. While there appears a lack of detail and assessment on many of the topics, others are incredibly detailed, such as the assessment of onshore wind and solar. RTPI Cymru supports greater detail in the final NDF and would encourage a spatially specific approach across the NDF, as that detailed for renewable energy generation.

It is with some concern that we note that the map at page 25 focuses primarily on what already exists. We question if it is forward looking enough and if it provides the solutions needed at this level for the next 20 years. The NDF recognises connectivity issues (road and rail) in Wales but does not suggest any specific proposals for improvements. For a 20-year plan, the NDF should be more ambitious. The map and text could go further to highlight where transport development could emerge.

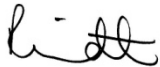
It is disappointing that the NDF simply seeks to improve connectivity between south Wales/south west England and north Wales/north east England. The long-term plan should set a strong and clear vision for improving the notoriously poor links between north and south Wales. We question the need for a criteria-based policy for transport (roads, railways, airports) which are all potentially DNS projects.

The NDF does not address the important issue of the marine and land based planning systems at the coast. Particularly important to be considered in view of climate change.

We welcome that the NDF recognises that there are spatial issues in England that require a response and long term plan from Wales. A challenging question is whether greenbelts, as proposed by the NDF, are a helpful approach to reflect the border with England. We note that greenbelts and growth from England affects Wales. For example growth in Bristol and the approach to managing this, along with the scrapping of tolls on the Severn crossings all have a significant impact on South East Wales in terms of housing, transport and congestion issues.

If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,



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Director
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